

November 24, 2025

Stasia Ferbey, B.Sc.
Project Assessment Director
BC Environmental Assessment Office

SUBJECT: Telkwa Mining's Fulfillment of the Environmental Assessment Office's Transition Order, Item 6, for the Tenas Project

Dear Stasia,

Telkwa Mining Limited (Telkwa Mining; previously Telkwa Coal Limited) is submitting the attached updated **final** response report (**Enclosure 1**) in fulfillment of Item 6 of Section C of Schedule A of the Transition Order issued on 16 December 2022. The Transition Order, Item 6 of Section C of Schedule A, require the following: :

6. *The Project's greenhouse gas (GHG) emissions, including:*
 - a. *How the Project's GHG emissions relate to the targets under the BC Climate Change Accountability Act.*
 - b. *The Project's potential positive or negative effects on carbon sinks, including forests.*

Telkwa Mining contracted Ausenco Engineering Canada ULC (Ausenco) to prepare an updated response report (the report) in response to the above Transition Order requirements. A draft of the report was provided to the the Office of the Wet'suwet'en (OW) in November 2024 for feedback and the report was also submitted to the BC Environmental Assessment Office (EAO) in March 2025 and requested feedback. Since this submission, Telkwa Mining has received additional information from the OW and the report that was submitted in November 2024/March 2025 has been updated to incorporate this information (**Enclosure 1**). **Enclosure 1** provides an updated assessment of the Project's greenhouse gas (GHG) emissions for the Tenas Project's total life cycle and potential effects on carbon sinks.

OFFICE OF THE WET'SUWET'EN COMMENTS

The OW has provided Telkwa Mining with the following submissions that included comments on the draft report submitted in November 2024/March 2025:

- 28 February 2025 letter with the subject "*Office of the Wet'suwet'en Response to Telkwa Mining Limited's November 28, 2024 Letter re: IR Status*";

- 12 March 2025 letter with the subject “*Information Requests Regarding Impacts to Caribou and Aquatic Resources for the Tenas Coal Project*”; and
- 15 May 2025 email with the subject “*Section 25 IR Response – OW Review*”.

Telkwa Mining’s responses to these comments are provided in Appendix A of **Enclosure 1**. The report includes tracking tables with the OW’s comments and Telkwa Mining’s responses.

OTHER REVIEWER COMMENTS

Two other groups who provided comments on this report were Northern Health (NH) and Climate Action Secretariate (CAS). NH comments and responses are provided in **Enclosure 2**. Ausenco updated their report to reflect these comments. **Enclosure 1** enclosed is the final updated report related the fulfillment of Item 6 of Section C in Schedule A of the Transition Order issued on 16 December 2022.

CAS asked that operational emissions intensity calculations include fugitive emissions from the project. While your July 31 GHG Update calculated these emissions and added them to the total GHG inventory, they were excluded from the operational intensity figures (consistent with Output-Based Pricing System rules). ECS asks for fugitive emissions to be included so that the project’s reported intensity for the EA and Net-Zero Plan reflects all potential emissions. **Enclosure 1** was updated to include modelled fugitive emissions from the Project and even with this the modelled Project’s emission intensity is still below the BC Performance Standard for open pit bituminous (steelmaking) coal.

CLOSING

Telkwa Mining is submitting the enclosed information in fulfillment of Item 6 of Section C of Schedule A of the Transition Order. The intent is for this information to support the EAO advancement of the Tenas Project to the Effects Assessment Phase, and the development of the EAO’s Effects Assessment Report, draft Certificate and recommendations.

Telkwa Mining understands that the OW is completing their Assessment Process. Telkwa Mining is committed to continuing to work with the OW throughout Tenas Project development to appropriately integrate the OW’s supplemental information and welcomes their ongoing participation in the Tenas Project. Where additional responses are appropriate based on engagement with OW and EAO, Telkwa Mining will provide supplemental information to both the EAO and the OW.

Sincerely,



Daniel J. Farmer, P.Eng.
Project and Development Manager
Telkwa Mining Limited
Email: dan.farmer@telkwa-mining.ca
Phone: +778-643-2843
Cell: +604-220-5703

Cc. Jessy Chaplin, File
Stasia Ferbey, Project Assessment Director, BC EAO

ENVIRONMENTAL ASSESSMENT OFFICE AND OFFICE OF THE WET'SWUET'EN INFORMATION REQUESTS

Enclosure 1: Tenas Project: Greenhouse Gas Emissions Update, Ausenco
Enclosure 2: Northern Health Comments and Responses based on Telkwa Mining's Response
to Transition Order Schedule A Section C Items 1, 2, 3, 4, 5, and 6

Enclosure 1

TENAS PROJECT: GREENHOUSE GAS EMISSIONS UPDATE, AUSENCO

Tenas Project: Greenhouse Gas Emissions Update

Prepared for:

Telkwa Mining Limited
Suite 1410 – 409 Granville Street,
Vancouver BC V6C 1T2

Project No. 103260-07

July 23, 2025

Prepared by:

Ausenco Engineering Canada ULC
1050 W Pender Street
Vancouver, BC V6E 3T4
T: 604.684.9311
ausenco.com

Revision	Date	Description	Author		Approver	
			Name	Position Title	Name	Position Title
1	June 26, 2025		Sara Turner	EA and Permitting Specialist	Denise Mullen	Director
2	July 4, 2025		Sara Turner	EA and Permitting Specialist	Denise Mullen	Director
3	July 16, 2025		Sara Turner	EA and Permitting Specialist		
4	July 21, 2025		Sara Turner	EA and Permitting Specialist	Denise Mullen	Director
5	Sept 25, 2025		Sara Turner	EA and Permitting Specialist	Denise Mullen	Director

Disclaimer

This document and its contents are for the private information and benefit only of Telkwa Mining Limited. The contents of this document are not to be reused in whole or in part, by or for the benefit of others without prior adaptation by, and the prior specific written permission of, Ausenco Engineering Canada ULC.

Financial and other projections, analysis and conclusions set out in this document, to the extent they are based on assumptions or concern future events and circumstances over which Ausenco Engineering Canada ULC has no control are by their nature uncertain and are to be treated accordingly. Ausenco Engineering Canada ULC makes no warranty regarding any of these projections, analysis and conclusions. Ausenco Engineering Canada ULC, its affiliates and subsidiaries and their respective officers, directors, employees and agents assume no responsibility for reliance on this document or on any of its contents by any party other than Telkwa Mining Limited.

The contents of this document are Copyright, © 2025 Ausenco Engineering Canada. All rights are reserved.

Executive Summary

The Tenas Coal Project (the Project) is an open pit steelmaking coal mine located approximately seven kilometres southwest from the village of Telkwa, British Columbia (BC). The Project is anticipated to produce approximately 825,000 tonnes per year of metallurgical coal used in steel production. The Project would include a coal processing plant (CPP) and an open pit mine, with material storage piles, surface water management features, water supply wells, mine haul roads, a power line, a rail loadout facility, a 2.5km rail loop, and related infrastructure.

This report provides an updated assessment of the Project's greenhouse gas (GHG) emissions in response to a request from the Office of the Wet'suwet'en for additional information on the Project's total life cycle GHG emissions and impact on carbon sinks. The original 2022 Tenas Environmental Assessment Certificate application was completed before the implementation of the BC Output-Based Pricing System (OBPS), and therefore did not incorporate the methodology now required under that framework.

The BC OBPS, implemented in 2024, is a legally binding emissions-pricing framework that takes precedence over voluntary Net-Zero Planning. BC OPBS is aligned with Canada's national approach and targets large industrial emitters by quantifying emissions, identifying mitigation options, and outlining reduction pathways. It requires industrial facilities to assess performance against product-specific benchmarks and report emissions, annually. Emissions above the benchmark are subject to compliance costs, rising from \$95/tCO₂e in 2025 to \$170/tCO₂e by 2030, while below-benchmark performance can generate tradable credits.

The Project's total emissions are estimated at 30,939 tCO₂e annually, or 680,652 tCO₂e over the life of mine. Covered emissions under BC OBPS, including fuel use and rail transport, account for 37% (11,404 tCO₂e/year), while fugitive emissions from coal, reported but not regulated, account for 63% (19,535 tCO₂e/year).

The Project's estimated emission intensity is 0.0152 tCO₂e per tonne of steelmaking coal or about 44% below the BC OBPS benchmark of 0.0270 tCO₂e. This low intensity reflects key project features such as a low strip ratio, high CPP yield, and onsite rail loadout. As a result, the Project is expected to consistently operate below regulatory limits and generate an average annual surplus of 8,824 tCO₂e in BC OBPS compliance credits.

Although guidance is pending, the Project's impact on carbon sinks have been conservatively estimated. Based on an ~830-hectare forested footprint, emissions are expected from undiverted biomass, making the site a net source during operations and for 17 years post-closure. It is then expected to return to a net sink, with reclamation aimed at restoring pre-development land capability and ecosystems.

As part of its development planning, the Project has evaluated a range of GHG reduction technologies aiming for near-complete electrification by 2040. A trade-off analysis was completed incorporating BC OBPS compliance scenarios, using conservative assumptions without relying on subsidies. Key measures include an electric conveyor system, electrified drills and shovels, a transition from hybrid to fully electric haul trucks, and a shift to 100% renewable diesel. Based on this analysis a combined

approach – integrating electric drills, shovels, and a hybrid/electric haul fleet – offers the largest potential reduction and could reduce emissions by over 113,000 tCO₂e over the life of mine. These options form the basis of the Project's GHG Management Strategy, subject to technology readiness, power availability, and fuel supply.

The Project is expected to operate consistently below the emissions threshold for steelmaking coal under the BC OBPS, generating an average annual surplus of 14,477 tCO₂e in compliance credits. With a low emissions profile, the Project may appeal to steelmakers seeking lower-emissions intensive feedstock. If all identified mitigation measures are implemented, the Project could achieve a life-of-mine average emissions intensity below 0.008 tCO₂e per tonne of steelmaking coal, reducing total emissions by up to 113,404 tCO₂e.

Table of Contents

Disclaimer	i
Executive Summary.....	ii
1.0 Introduction	1
1.1 Background.....	1
1.2 Wet’suwet’en Rights and Interests	1
1.3 Material Regulatory Changes in British Columbia	2
2.0 Methodology	3
2.1 BC OBPS Attributable and Covered Project Emissions.....	3
2.2 Upstream Emissions from Construction.....	4
2.3 Downstream Project Emissions including Steelmaking	4
2.4 Carbon Sink Estimation.....	5
2.5 Net-Zero Plan	6
3.0 Results	7
3.1 Update to Project’s GHG Emission Estimates	7
3.2 Project Estimated GHG Emissions under the BC OBPS.....	7
3.3 Estimated Upstream GHG Emissions	9
3.4 Project Estimated GHG Downstream Emissions.....	10
3.5 Project Cumulative GHG Emissions	12
3.6 Project Estimated Effect on Carbon Sinks.....	13
4.0 GHG Management Strategy	16
4.1 Potential Emission Reductions.....	17
5.0 Monitoring and Reporting	18
6.0 Conclusion.....	18
7.0 Recommendations.....	19
8.0 Closure	19

List of Tables (Within text)

Table 1	Project Estimated GHG Emissions during the Operation Phase for the Project under the BC OBPS	7
Table 2	Project Estimated GHG emission intensity in comparison to the British Columbia Performance Standard for open-pit bituminous (steelmaking) coal.....	8
Table 3	Project Estimated GHG Emissions during the Construction Phase of the Project	9
Table 4	Project Estimated GHG Downstream Emissions.....	10
Table 5	Estimated GHG Emissions during the Decommissioning and Reclamation Phase of the Tenas Project	12
Table 6	Estimated GHG Emissions during the Post-Closure Phase of the Tenas Project	12
Table 7	Life of Project (LOP) Estimated GHG Emissions by Phase of Development for the Project.....	12
Table 8	Project Estimated Effect on Carbon Sinks.....	13

List of Figures (Within text)

Figure 1	Tenas Project Emissions (tCO ₂ e)	8
Figure 2	Composition of the One-year Construction Related GHG Emissions (tCO ₂ e).....	10
Figure 3	Proportion of GHG Emissions by Downstream Activity	11
Figure 4	LOP GHG Emissions by Project Phase of Development, tCo ₂ e	13
Figure 5	Annual Project Reclamation and Disturbance Area	14
Figure 6	LOP Impact to Carbon Sinks (tCO ₂ e).....	15
Figure 7	Year over Year Emissions Reductions by Option (tCO ₂ e)	17

List of Appendices

Appendix A	Response to Information Requests Cross Reference
Appendix B	Net-Zero Plan Checklist and Cross Reference

1.0 Introduction

The Tenas Coal Project is an open pit steelmaking coal mine (Project) located approximately seven kilometres southwest from the village of Telkwa, British Columbia (BC). The Project is anticipated to produce approximately 825,000 tonnes per year of metallurgical or coking or steelmaking coal used in steel production. The Project would include a coal processing plant (CPP) and an open pit mine, featuring material storage piles, surface water management features, water supply wells, mine haul roads, a power line, a rail loadout facility, a 2.5km rail loop, and related infrastructure.

1.1 Background

The Tenas Project included an estimated greenhouse gas emission (GHG) inventory for annual operations in May 2022 as a part of the Project Environment Assessment Certificate Application submitted to the British Columbia Environmental Assessment Office (EAO). In late 2022, the Project transitioned to the 2022 EA Act and was issued a transition order from the EAO that had the following request:¹

- 6) *The Project's greenhouse gas (GHG) emissions, including:*
 - a) *How the Project's GHG emissions relate to the targets under the BC Climate Change Accountability Act.*
 - b) *The Project's potential positive or negative effects on carbon sinks, including forests.*

Telkwa Mining prepared a draft response on November 28, 2024, and submitted this to the Office of the Wet'suwet'en (OW) for review and feedback. In response to the submission on February 28, 2025, and May 15, 2025, the OW have requested further information. Specifically, the Project's impacts on carbon sinks and confirmation of the Project's total contributions of greenhouse gas emissions (GHGs) over the life cycle of the Project, from construction and operation, and downstream emissions. The OW requested information is listed below, verbatim:²

- The Project's GHGs and impacts on local carbon sinks are in line with Wet'suwet'en priorities.
- That proposed mitigation measures and/or emissions management plans are effective and account for Wet'suwet'en rights and interests.

See **Appendix B** Response to Information Requests Cross Reference

1.2 Wet'suwet'en Rights and Interests

According to the Tenas Project Environment Assessment Certificate Application Section 11, the Wet'suwet'en worldview is described:

...all aspects of land and people are connected. The foundation and rationale for Wet'suwet'en values and interests is Yintah, a concept in which all environmental components—from plants and animals to waterways and mountains—are all interconnected and linked with the human world.³

¹ [Tenas Transition Order December 16, 2022](#)

² Office of the Wet'suwet'en. (2025). Re: Office of the Wet'suwet'en Response to Telkwa Mining Limited's November 28, 2024.

³ [11.0_Wet'suwet'en Part C_May2022- Part1.pdf](#)

The following GHG estimate will benchmark the Tenas Project against BC specific performance standards and current international best practice methodologies. It provides information that enhances understanding of the Project's GHG contributions, supporting consideration of potential impacts to Wet'suwet'en rights and interests to be considered by regulatory agencies, Telkwa Mining and Wet'suwet'en peoples.

1.3 Material Regulatory Changes in British Columbia

In 2024, British Columbia implemented its Output Based Pricing System or OBPS, aligning with Canada's national approach to industrial emissions pricing. The BC OBPS is integrated with Canada's broader GHG reduction framework and supports the country's Nationally Determined Contributions (NDCs) under the Paris Agreement. These NDCs represent Canada's commitments to reducing greenhouse gas emissions. The BC OBPS targets emissions from large industrial sources.

BC's OBPS applies to facilities that produce a regulated product and emit more than 10,000tCO₂e/annually. Covered facilities are required to report emissions from specified sources and assess their emissions intensity against a product specific performance benchmark such as bituminous (steelmaking) coal produced from an open pit. Emissions that exceed the annual benchmark are subject to compliance obligations, with payment based on the Federal price of \$95/tCO₂e in 2025 increasing to \$170/tCO₂e by 2030. Facilities that operate below their regulated benchmark may generate surplus units or credits, which can be sold. Limited use of carbon offsets is also permitted for compliance but need to meet the requirements specified in the regulations. The Tenas Project is expected to be a covered facility under the B.C. OBPS, as outlined in the 2025 CleanBC Industrial Incentive Program.

2.0 Methodology

The GHG emission estimate for the Tenas Project in this report follows the World Resources Institute (WRI) GHG Protocol for estimating project emissions. The BC OBPS tool is also used to update the Projects Life of Project (LOP) emissions including the performance standard for open-pit produced Bituminous Coal in British Columbia.

2.1 BC OBPS Attributable and Covered Project Emissions

The emissions for The Tenas Coal Project recognized by the OBPS was estimated based on covered activities related to industrial production, manufacturing, processing, and refining that fall within the scope of the BC OBPS. These activities are outlined in the *Greenhouse Gas Emission Reporting Regulation (GGERR)*,⁴ which provides a detailed list of emission sources and activities that contribute to GHG emissions.

Under the GGERR, operators of reporting and regulated operations must submit an annual emission report that adheres to prescribed quantification methodologies for each activity. These methodologies are based on emission factors specific to BC, as well as those outlined in the Western Climate Initiative (WCI) methodologies,⁵ which provide region-specific guidelines for emission reporting. This ensures that emissions from industrial activities are quantified consistently across various jurisdictions and align with regional and national standards. *Greenhouse Gas Industrial Reporting and Control Act (GGIRCA)* along with the GGERR, governs the reporting and compliance framework for industrial emissions in BC. These regulations require that only direct emissions from covered activities under the BC OBPS are included in the emissions report. Direct emissions are those from operations and processes that fall under the BC OBPS rules. It is important to separate indirect emissions (supply chain activities) or emissions that fall outside the scope of the BC OBPS to avoid double counting of emissions and emission reductions.

The estimate for the Tenas Project GHG inventory update uses the WCI methodologies and formulas typically applicable to open-pit metallurgical bituminous coal reporting operations:

- WCI.020 General Stationary Combustion
- WCI.280 Mobile Equipment at Facilities.

The fugitive methane emissions from coal, when broken or exposed to the atmosphere during mining in open-pit coal mines, are considered an attributable emission under the BC OBPS. This is different than a compliance emission but is still included in the Project's GHG emissions inventory. The method for estimating fugitive emissions is described in GGERR Bulletin 16 and referenced in Column 5 of item 25 of Table 1 of Schedule A of GGERR.⁶

⁴ https://www.bclaws.gov.bc.ca/civix/document/id/lc/statreg/249_2015

⁵ <https://www2.gov.bc.ca/gov/content/environment/climate-change/industry/reporting/quantify>

⁶ https://www.bclaws.gov.bc.ca/civix/document/id/lc/statreg/249_2015

Rail car emissions from the 2.5km rail loop are also considered covered emissions under the BC OBPS.⁷ To estimate emissions from rail car activities the GHG Protocol distance weight method for rail transport was used.⁸

2.2 Upstream Emissions from Construction

To estimate GHG emissions associated with upstream emissions from Project construction, emission factors provide below for cement, steel, and diesel were used to generate emission values from engineering estimates.

- The emission factor used for diesel was 0.002616375 tCO₂e/L for 2024.⁹
- The emission factor used for cement used was 0.886 tCO₂e/tonne cement.¹⁰
- The emission factor used for steelmaking used for consistency with downstream emission estimates was the average emission factor for the steel sector in Japan, or 1.92 tCO₂e/tonne of steel produced.¹¹

2.3 Downstream Project Emissions including Steelmaking

To estimate the GHG emissions associated with the downstream Project activities including the offsite transportation of coal and emissions related to steelmaking using coal supplied from the Tenas Project, the GHG Emissions from Transport or Mobile Sources tool was applied considering Scope 3 Category 4 (Upstream Transportation and Distribution) emissions, the distance-based method. With the following assumptions:

- The annual production of coal is consistent at 822,000 tonnes for 25 years.
- The coal is transported from the site load out facility via the Canadian National (CN) rail line to Prince Rupert's Trigon Pacific Terminals for export.
- For estimation purposes this inventory assumes that the coal is shipped to the Port of Kawasaki, Japan, where it is processed at the Kawasaki industrial refinery.
- Emissions estimates for steel production are based on an average sectoral emission factor of 1.92 tonnes of CO₂ equivalent per tonne of steel produced in Japan¹².
- The estimate assumes that producing 1 tonne of steel requires ~770 kg of metallurgical coal¹³.

Exclusions:

GHG emissions from the use of transmission system connected electricity are excluded from the BC OBPS as per regulatory requirements. In other words, emissions from purchased electricity are not attributed to a facility's operations for reporting or compliance under this system.

⁷ https://www2.gov.bc.ca/assets/gov/environment/climate-change/ind/obps/guidance/bc_obps_guidance.pdf

⁸ <https://ghgprotocol.org/standards-guidance>

⁹ https://data-donnees.az.ec.gc.ca/api/file?path=%2Fsubstances%2Fmonitor%2Fcanada-s-official-greenhouse-gas-inventory%2FD-Emission-Factors%2FEN_Annex6_Emission_Factors.pdf

¹⁰ <https://www.epa.gov/system/files/documents/2021-10/cement-carbon-intensities-fact-sheet.pdf>

¹¹ <https://worldsteel.org/wider-sustainability/sustainability-indicators/>

¹² <https://worldsteel.org/wider-sustainability/sustainability-indicators/>

¹³ Gordon, C., Northcote, B., Katay, F., & Tombe, P. S. (2020). *Exploration and Mining in British Columbia, 2019: A summary*

According to the Province of BC, transmission system connected entities must use the Electricity Emission Intensity Factors (EEIF) to quantify GHG emissions from electricity purchased from BC's electricity system in the following cases:

- Offset projects, as specified in relevant GHG offset protocols.
- Public Sector Organizations under the Carbon Neutral Government Regulation.

For other customers of BC Hydro and FortisBC, use of the EEIF is optional and primarily for internal reporting purposes.

Including emissions from electricity on the BC Integrated Transmission System, as defined by the GGIRCA¹⁴ could result in double counting of emissions.

Corporate sustainability policies outside of the BC OBPS regulation are outside the scope of this response.

2.4 Carbon Sink Estimation

The GHG Methodology for the Land Sector and Removals, which will provide guidance on calculating GHG emissions from land use change, is currently in development and expected to be available by the end of 2025.

The potential effects of the Project on carbon sinks can be estimated, conservatively, using existing scientific literature. A study by Fredeen *et al.* (2005) examined carbon stocks in central BC forests and reported a range of 194-423 tonnes of carbon stored per hectare for 2nd growth and old growth forests, respectively. Within these totals, soil carbon accounted for 112-115 tonnes per hectare, while stem wood contained about 67 tonnes per hectare.

To assess carbon sink recovery, research summarized by Black *et al.* (2008) found that newly clearcut coastal forest stands in BC emitted roughly 6 tonnes of carbon per hectare annually, whereas stands nearing the end of a typical 50 to 60-year rotation sequestered around 4 tonnes per hectare each year. The transition from a net carbon source to a carbon sink was measured to occur after approximately 17 years of regrowth.

Based on these findings and applying the above conservative approach in carbon accounting for carbon sinks, the estimate of the Tenas Project's potential impact on carbon sinks can be developed using the following assumptions:

- The Tenas Project Footprint is approximately 830.1 hectares,
- The Project Footprint calculation assumes 100% (conservative, as it less than this) forest cover at the highest range or 423 tonnes (conservative given age of tress) of carbon per hectare,
- Stem wood or 67 tonnes of carbon per hectare will be redirected to sawmills,
- Burning or natural decay will release the total remaining carbon (67 tonnes) to the atmosphere over the Life the Project,

¹⁴ <https://www2.gov.bc.ca/gov/content/environment/climate-change/data/electricity>

- 17 years after closure the Project Footprint will be a net carbon sink again, and
- The closure goal for the Project is to restore local ecosystems through reclamation. The primary land capability goal is to re-establish, to the extent possible, the pre-existing ecosystems in the proportions like those present before development, while achieving an average land capability that is at least equal to the pre-disturbance condition. These goals are the foundation of the Project's Reclamation and Closure Plan.

2.5 Net-Zero Plan

The BC OBPS came into effect in 2024 and is a legally enforceable, emissions-pricing compliance framework. As such this framework takes precedence over Net-Zero Planning, which is voluntary, aspirational, and strategic. But for purposes of completeness, **Appendix B** provides a cross-referenced checklist identifying where the key elements of a Net-Zero Plan are addressed within this OBPS framework. The Tenas Project's GHG assessment aligns with the federal government's Strategic Assessment of Climate Change by evaluating the Project's emissions profile, identifying feasible mitigation measures, and outlining a credible pathway toward emission reductions consistent with Canada's approach for managing greenhouse gases and its net-zero commitment.

The Project's ability to achieve net-zero is contingent on supportive provincial and federal government policies including those that enable infrastructure upgrades, low-carbon fuel availability, and investment in low or no GHG emissions technologies which are essential conditions that must be clearly recognized in regulatory assessments. Lastly, the Project's ability to achieve its GHG reduction goals depends significantly on BC Hydro's capacity to deliver adequate energy, at a reasonable cost, and in alignment with the Project's development schedule.

3.0 Results

3.1 Update to Project's GHG Emission Estimates

In 2019, BC launched the CleanBC Program for Industry, which included the CleanBC Industrial Incentive Program and the CleanBC Industry Fund. As part of Budget 2023, the province announced a shift to an output-based pricing system for industrial emissions pricing, aligning BC's approach with the rest of Canada, except Quebec. Throughout 2023, the provincial government worked with industry and stakeholders to develop the BC OBPS, which came into effect on April 1, 2024.

The 2022 Tenas Environmental Assessment Certificate Application (EAC application) was completed before the BC OBPS methodology was finalized. Given that BC OBPS was not in force at the time, EAC application estimates did not reflect the emerging methodology. This memo updates the EAC application GHG estimates according to the required accepted methodology.

3.2 Project Estimated GHG Emissions under the BC OBPS

The following section presents the results of the GHG emissions calculations, outlining key assumptions, and trends over the life of mine (LOM). It includes a breakdown of direct and indirect emissions, encompassing covered (on-site) emissions, upstream and downstream activity emissions, as well as potential impacts on carbon sinks.

Table 1 shows the emissions profile of the Project is shown for three key components: covered emissions, attributable emissions, and total emissions. Covered Project emissions, regulated under the BC OBPS, include direct on-site emissions such as fuel combustion and onsite rail transportation. These emissions are estimated to be 11,404 tCO₂e annually, totaling 250,880 tonnes over the life of mine. This represents approximately 37% of the Project's total emissions.

Table 1 Project Estimated GHG Emissions during the Operation Phase for the Project under the BC OBPS

Project GHG Emission Types	Units	Average Annual	LOM
Covered Project Emissions	tCO ₂ e	11,404	250,880
Attributable Project Emissions	tCO ₂ e	19,535	429,772
Total Project Estimated GHG Emissions¹⁵	tCO₂e	30,939	680,652

Attributable Project emissions are reported as emissions under the BC OBPS but are not considered compliance emissions or considered in the emission intensity of the project. Attributable Project emissions for the Tenas Project are fugitive emissions from coal when broken or exposed to the atmosphere. At 19,535 tCO₂e annually or 429,772 tonnes over the life of the mine, these emissions account for ~63% of total project emissions.

¹⁵ Differences from EA estimated fugitive emissions can be addressed by the updated method for calculating fugitive emissions in BC.

Together, covered, and other emission sources result in an estimated total of 30,939 tCO₂e per year of operation, with a LOM total of 680,652 tonnes.

Figure 1 shows the year-over-year comparison of estimated emissions compared to allowable emissions.

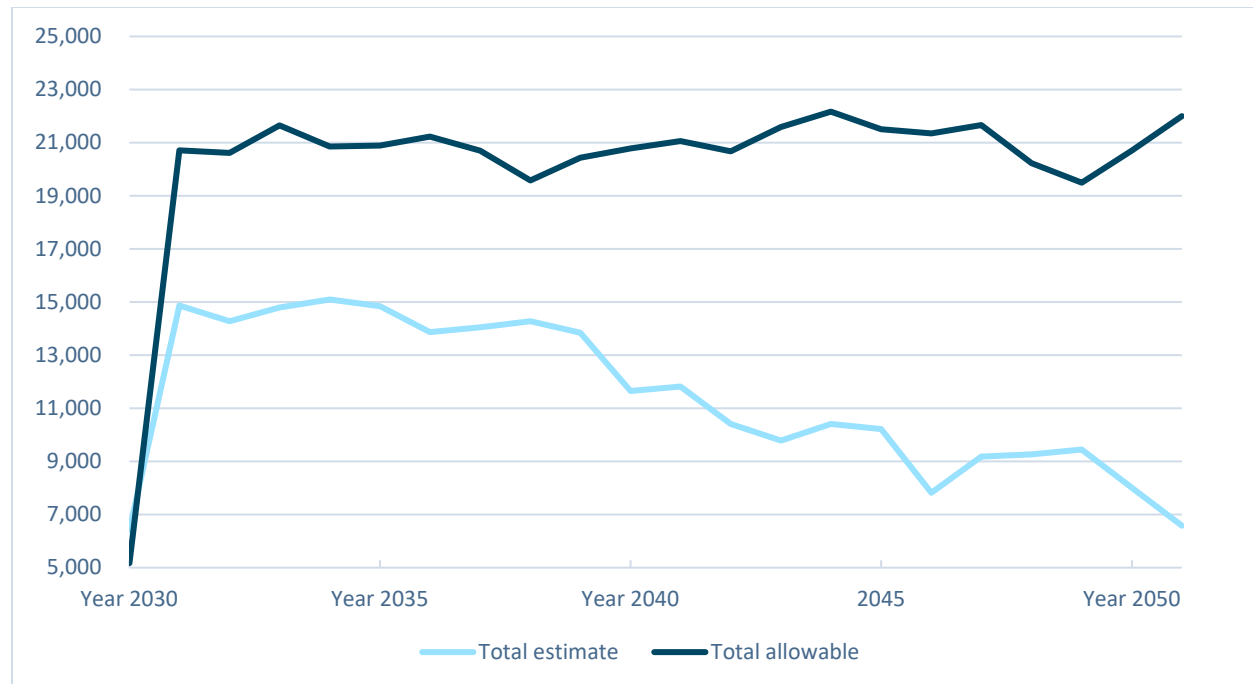


Figure 1 Tenas Project Emissions (tCO₂e)

Table 2 shows the Project's estimated emission intensity considering covered emissions is estimated at 0.0152 tCO₂e per tonne of steelmaking coal, which is notably lower than the BC OBPS performance standard of 0.0270 tCO₂e per tonne of steelmaking coal. This represents an emissions intensity approximately 44% below the provincial benchmark, indicating that the Project is performing well within regulatory expectations. Table 2 includes an estimated emission intensity of coal produced by the Project including all fugitive emissions from coal when broken or exposed to the atmosphere of 0.0260 tCO₂e per tonne of steelmaking coal. Coal from the Project has a lower emission intensity than many global coal resources considering the range of emission intensity for coal estimated by Wood Mackenzie (2021) Metals & Mining Emissions Benchmarking Tool (EBT) of 0.0010 to 0.0630 tCO₂e per tonne of steelmaking coal. The EBT for coal includes both emission from energy consumption and fugitive methane emissions.

Table 2 Project Estimated GHG emission intensity in comparison Performance Standards for open-pit bituminous (steelmaking) coal

GHG Emission Intensity	Units	Intensity Factor
Project Estimated Intensity (Covered)	tCO ₂ e/tonnes steelmaking coal	0.0152
BC Performance Standard	tCO ₂ e/tonnes steelmaking coal	0.0270
Project Estimated Intensity (Attributable)	tCO ₂ e/tonnes steelmaking coal	0.0260
Emission Intensity for Coal (2021)	tCO ₂ e/tonnes steelmaking coal	0.0010 – 0.0630

The emission intensity metric is a key performance indicator of environmental performance in the mining sector and allows the Tenas Coal Project to measure and compare its potential environmental effect against different operations regardless of their size, or production output. The Tenas estimate for LOM emission intensity is below guidelines and highlights the unique features of the Project including a low strip ratio (i.e., amount rock that needs to be moved to recover a tonne of steelmaking coal), high CPP yield, and onsite rail loadout.

The Tenas Project is estimated to consistently produce steelmaking coal under the allowable emissions for a coal mine in Canada and will therefore generate an average annual surplus of 8,824 tCO₂e in compliance credit units under the BC OBPS.

3.3 Estimated Upstream GHG Emissions

Estimated emissions from the construction of the Tenas Coal Project or upstream emissions are presented in **Table 3** and **Figure 2**. The overall construction of the Tenas Coal Project is expected to be completed within approximately a one-year timeframe. As such, the embedded emissions from steel and other materials like concrete are concentrated in this initial period, representing a one-time contribution to the Project's total emissions profile.

Construction emissions, such as embedded steel emissions, are disclosed for transparency but are not attributed under the BC OBPS. They are excluded from compliance totals to avoid double counting, though some overlap may occur in broader lifecycle or national inventories.

Table 3 Project Estimated GHG Emissions during the Construction Phase of the Project

Construction Estimated GHG Emissions (tCO ₂ e)	Construction Phase
Embedded emissions in steel used	12,480
Embedded emissions in concrete used	399
Mobile and stationary equipment combustion	3,925
Total Estimated GHG emissions from construction	16,803

The total construction related emissions are estimated at 16,803 tCO₂e and are categorized into three main sources: embedded emissions in materials (steel and concrete) and emissions from fuel combustion on-site.

The largest contributor is the embedded emissions in steel, totalling 12,480 tCO₂e. These represent the upstream emissions generated during the production of steel used by the Project, including mining, processing, and manufacturing activities. This category accounts for approximately 75% of the total construction-related emissions.

The embedded emissions in concrete contribute an additional 399 tCO₂e or less than 0.2% of the total. These emissions are primarily associated with the production of cement, as well as the processing and transport of concrete materials used during construction.

Additional contributions come from the combustion of fuel by mobile and stationary equipment, which accounts for 3,925 tCO₂e or 23% of total emissions.

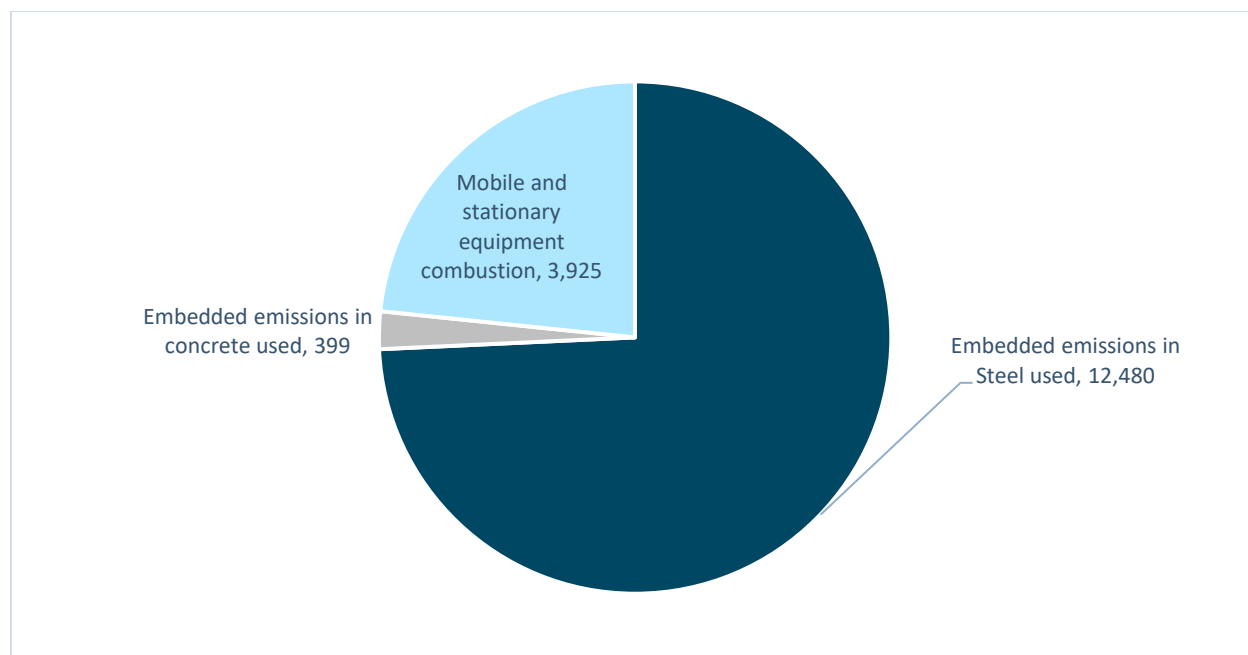


Figure 2 Composition of the One-year Construction Related GHG Emissions (tCO₂e)

3.4 Project Estimated GHG Downstream Emissions

Downstream emissions from the Tenas Coal Project are included at the request of the OW. These estimates help illustrate the full magnitude of the project's emissions by outlining the broader lifecycle of the steelmaking coal use.

Table 4 shows that downstream emissions from the Tenas Coal Project are estimated at approximately 59.9 million tCO₂e over the life of mine. About 86% of emissions are associated with steelmaking in Japan and could generate around 51.2 million tCO₂e assuming no carbon capture technologies which are proposed to be introduced in the future. This reflects the combustion of metallurgical coal in blast furnaces, where it is used both as a fuel source and a reducing agent in the steel production process.

Marine shipping from Ridley Terminal to the Port of Kawasaki accounts for an additional 8.3 million tCO₂e, or roughly 14% of downstream emissions. Rail transport from the mine site in Telkwa to Trigon Terminal is a small share of total downstream GHG emissions at around 340,000 tCO₂e over the life of the mine or less than 1% of the total.

Table 4 Project Estimated GHG Downstream Emissions

Downstream Emissions	Units	Annual	LOM
Telkwa to Ridley Terminal (Rail)	tCO ₂ e	13,602	340,000
Ridley Terminal to Port of Kawasaki (Ship)	tCO ₂ e	333,720	8,343,000
Steelmaking in Japan	tCO ₂ e	2,049,662	51,241,558
Total Estimated GHG Emissions	tCO₂e	2,396,984	59,924,608

Figure 3 illustrates the relative contribution of each downstream activity to total downstream GHG emissions.

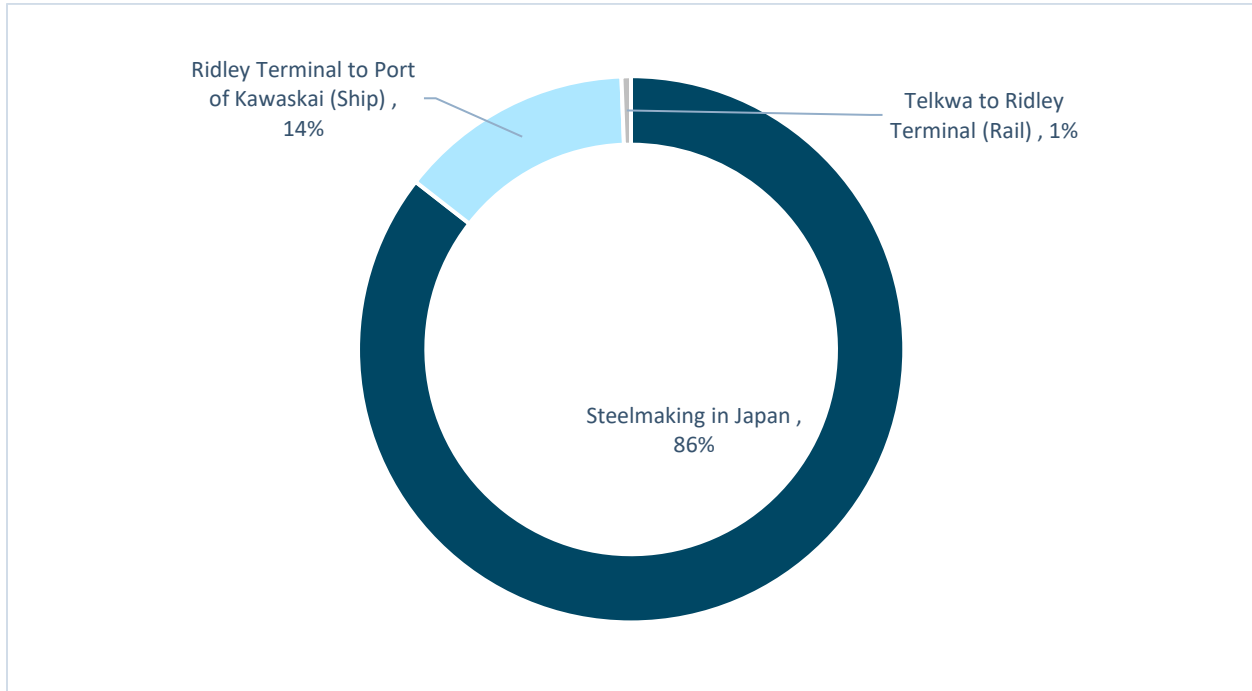


Figure 3 Proportion of GHG Emissions by Downstream Activity

The total estimated GHG emissions associated with steelmaking are 2,396,984 tCO₂e per year, amounting to 59,924,608 tCO₂e over the life of mine. Given its comparatively low emission profile, the Tenas Project may be well-positioned to attract interest from steelmakers seeking lower-emissions intensive metallurgical coal feedstock.

Steel made in Canada is covered by the federal OBPS, and provincially where the steel making facilities exist. Ontario's steelmaking industry for example, is subject to the province's Emission Performance Standards that is aligned with the federal OBPS. In alignment with BC's OBPS the Ontario system aims to reduce emissions and minimize the risk of carbon leakage.

Table 5 shows that during the Decommissioning and Reclamation phase of the project (Years 23 to 26), estimated emissions from mobile and stationary equipment combustion are expected to total approximately 7,848 tCO₂e. These estimated emissions are projected to peak in Years 23 and 24 at 2,616 tCO₂e during early reclamation activities involving heavy equipment. In Years 25 and 26, estimated emissions decline to 1,308 tCO₂e annually as site activity winds down.

Table 5 Estimated GHG Emissions during the Decommissioning and Reclamation Phase of the Tenas Project

Decommissioning and Reclamation Phase	Year 23	Year 24	Year 25	Year 26
Estimated GHG emissions from mobile and stationary combustion (tCO ₂ e)	2,616	2,616	1,308	1,308

Table 6 shows that in the Post-Closure phase, estimated emissions from mobile and stationary combustion are expected to remain low, averaging 65 tCO₂e annually, with a total of 3,270 tCO₂e estimated over a 50-year period. These emissions are associated with routine site monitoring, maintenance, and occasional equipment use required to maintain the integrity of the reclaimed area.

Table 6 Estimated GHG Emissions during the Post-Closure Phase of the Tenas Project

Post-Closure Phase	Annual	50-year total
Estimated GHG emissions from mobile and stationary combustion (tCO ₂ e)	65	3,270

3.5 Project Cumulative GHG Emissions

Table 7 and **Figure 4** shows the total estimated GHG emissions over the Project's 77-year lifecycle are estimated to be 708,575 tCO₂e. The Operation phase accounts for most GHG emissions estimated at 680,652 tCO₂e over 22 years (96%). This is followed by Construction phase GHG emissions estimated at 16,803 tCO₂e (2.4%). GHG emissions from the Decommissioning and Reclamation Phase over four years total an estimated 7,849 tCO₂e (1.1%), while Post-Closure activities over 50 years contribute a modest estimated 3,270 tCO₂e (0.5%) of GHG emission. GHG emissions from operations are significantly higher than other Project phases and these operational emissions are directly related to Project activities and covered by provincial greenhouse gas reporting regulations.

Table 7 Life of Project (LOP) Estimated GHG Emissions by Phase of Development for the Project

Project Phase GHG Estimated LOP Emissions	Years	Total (tCO ₂ e)
Construction Phase	1	16,803
Operation Phase	22	680,652
Decommissioning and Reclamation Phase	4	7,849
Post-closure Phase	50	3,270
Total GHG Estimated Emissions	77	708,575

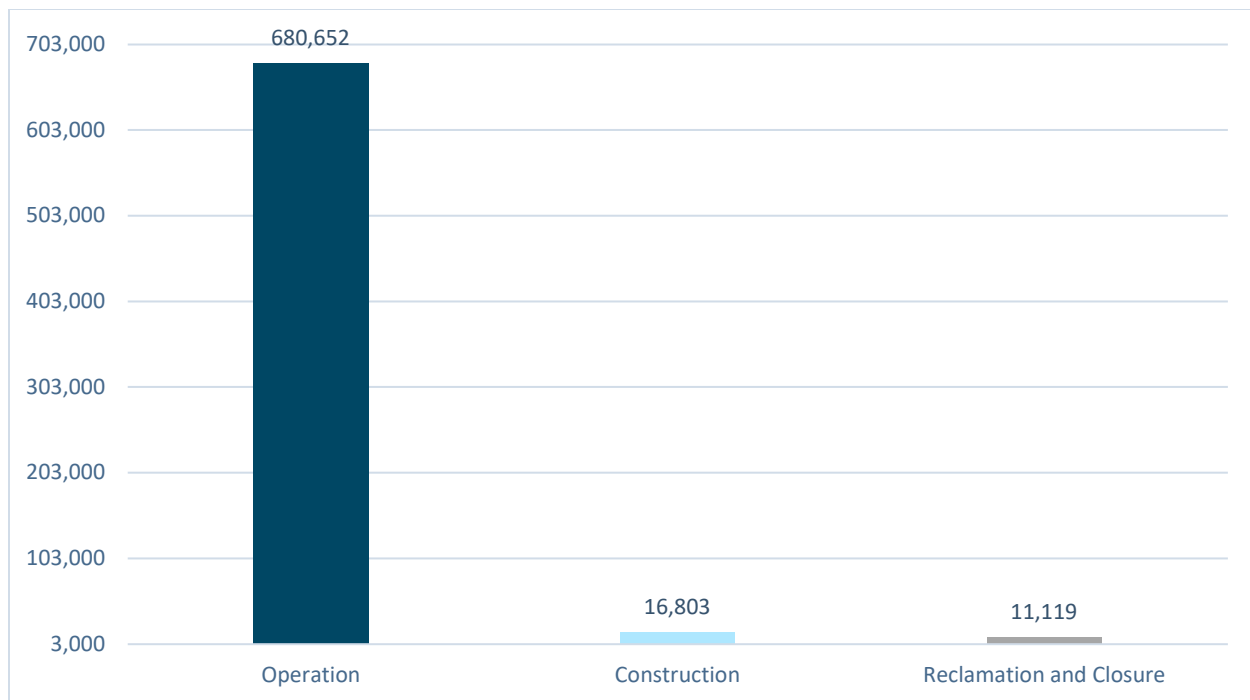


Figure 4 LOP GHG Emissions by Project Phase of Development, tCo2e

3.6 Project Estimated Effect on Carbon Sinks

Table 8 shows the estimated loss of carbon sinks. A conservative approach was used to estimate the Project's impact on GHG emissions from the loss of carbon sinks. Over the 25-year life of mine, the Tenas Project is estimated to result in a maximum loss of approximately 295,516 tCO₂e due to the reduction in carbon sink capacity. This loss is primarily a result of land disturbance and temporary vegetation removal from mining activities. This represents a maximum carbon sink impact period of 47 years made up of 30 years of Project disturbance and a 17-year recovery period.

Table 8 Project Estimated Effect on Carbon Sinks

Estimated Loss of Carbon Sinks	tCO ₂ e/Hectare	Total Carbon Sink Loss over 25-years (LOM) tCO ₂ e
Biomass	310	257,331
Soil	113	93,801
Useable wood	-67	55,617
Total estimated loss of carbon sinks	356	295,516

The largest portion of this effect (i.e., estimated 257,331 tCO₂e) is attributable to the loss of biomass carbon from the temporary removal of forest cover and associated vegetation. An additional estimated 93,801 tCO₂e is linked to the release of carbon stored in soils from excavation and surface disruption. Another estimated 55,617 tCO₂e are deferred emissions from usable wood. While this wood is not immediately combusted or decayed, it represents carbon that will eventually be released over time.

In practice, carbon sink capacity will begin to recover earlier as progressive reclamation, reforestation, and other mitigation measures are implemented throughout the Project lifecycle. **Figure 5** outlines the proposed reclamation plan for the Project, seeding 817 hectares by Year 27. **Figure 6** highlights the plan for progressive reclamation at the Tenas Project and the resulting cumulative impact to carbon sinks over time. On average, the total carbon sink loss amounts to an estimated 356 tCO₂e per hectare of land disturbed.

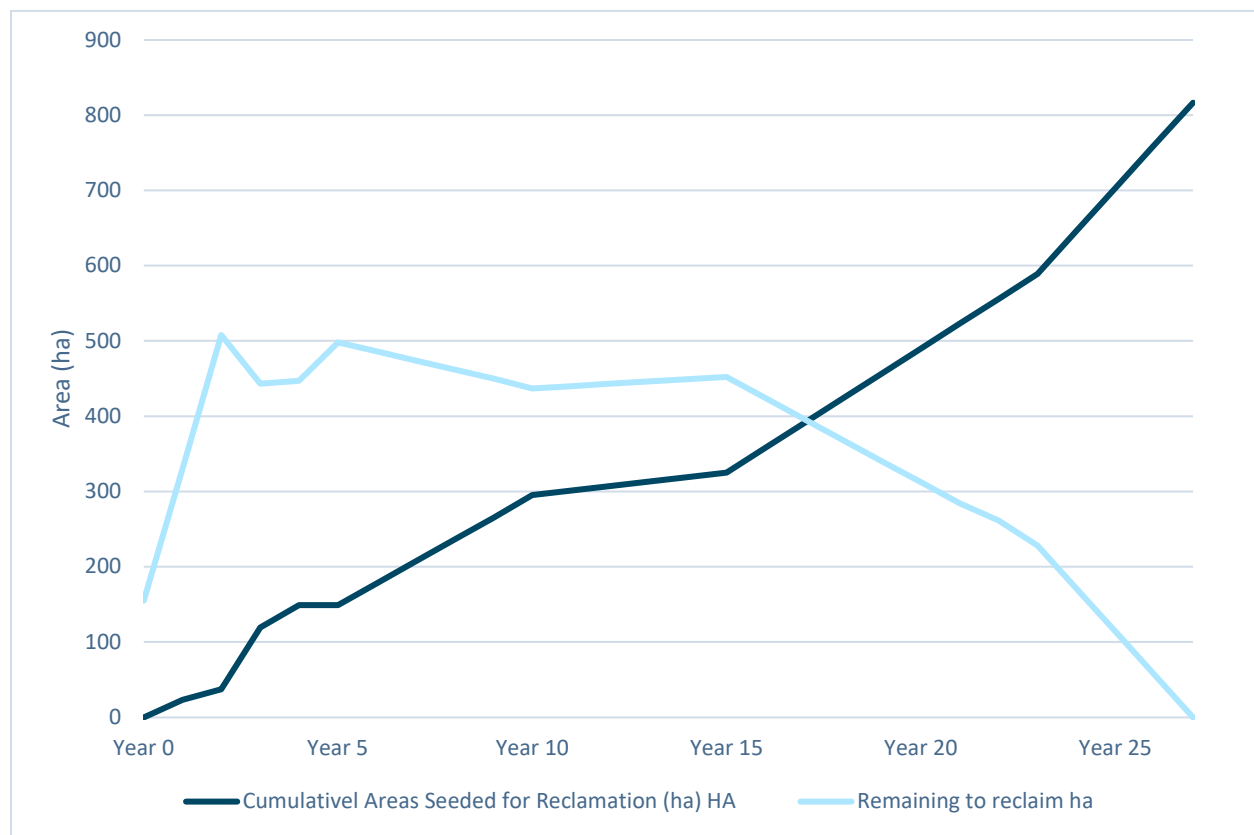


Figure 5 Annual Project Reclamation and Disturbance Area

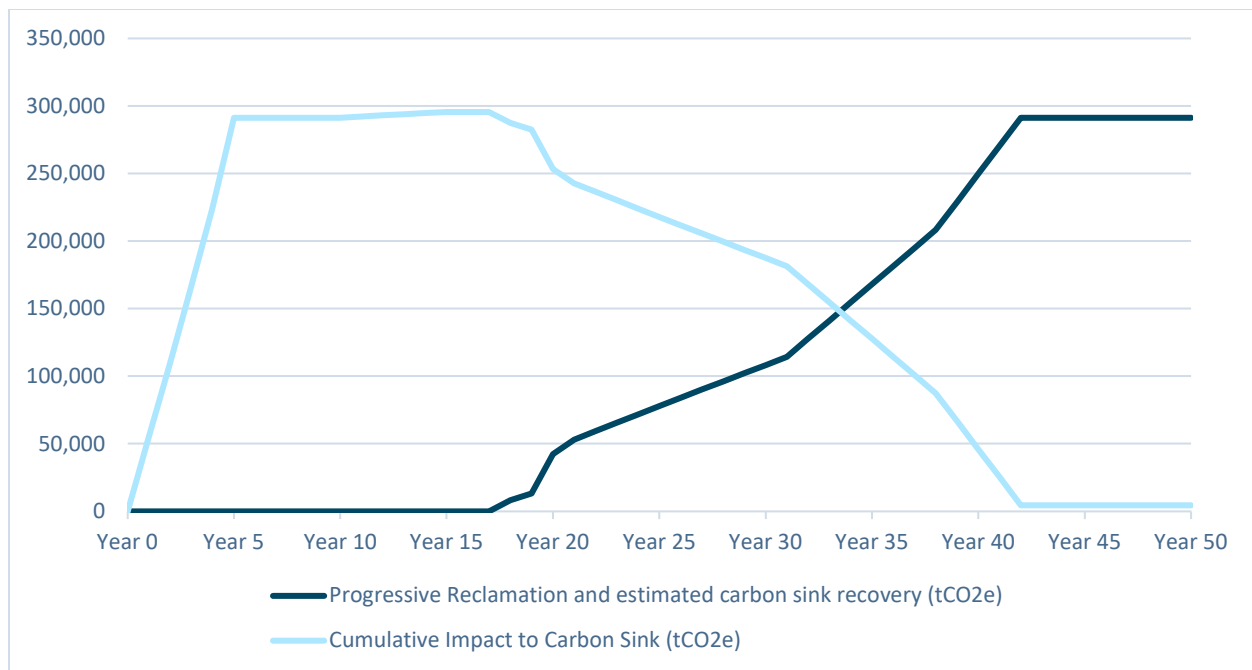


Figure 6 LOP Impact to Carbon Sinks (tCO₂e)

4.0 GHG Management Strategy

As part of its development planning, the Project has been actively evaluating GHG reduction technologies. The assessment includes potential investments such as an electric conveyor system, electric drills and shovels, and the purchase of a hybrid haul truck fleet, all aimed at achieving close to 100% electric operations by 2040. In addition, the Project explored the use of renewable diesel, with a target of transitioning to 100% renewable diesel use on site by 2040 if sufficient fuel is commercially available.

To develop a GHG Management Strategy for the Tenas Project Ausenco performed a trade-off assessment that integrated potential OBPS outcomes. Project-specific and supplier-specific data were used where available, while industry-standard emission factors were applied in cases where vendor-specific information was not provided.

The following assumptions were used in the trade-off assessment:

- The necessary technology is expected to be achievable by 2040, with a reliable supply of 100% renewable diesel anticipated from Edmonton, Alberta, or a closer source. Additionally, the deployment of a fully electric haul truck fleet is considered feasible within this timeframe. However, if the technology or fuel supply does not materialize as expected, alternative compliance strategies will need to be explored.
- The assessment assumes that no major tax incentives, including those for renewable diesel use, nor grants for equipment purchases or implementation of proposed technologies, will be used.
- The assessment incorporates pricing estimates for compliance carbon units under the BC OBPS, using the federally regulated pricing and applying conservative credit sale estimates informed by Ausenco's experience in carbon market analysis.
- Assume values provided are correct.

The results for the trade-off analysis are:

- **Electric Conveyor System:** This effort would involve the commissioning of an electric conveyor for the Project. The conveyor system will reduce Project diesel consumption by an estimated 3 million litres over LOM by eliminated trucks hauling steelmaking coal between the CPP and Rail Loadout. The average annual emission reduction of 357 tCO₂e and 7,849 tCO₂e LOM.
- **Electric Drills and Shovels:** This would involve the purchase of electrically powered equipment to reduce Project diesel consumption by an estimated 18.2 million litres over LOM. The average annual emission reduction of 2,169 tCO₂e and 47,738 tCO₂e LOM.
- **Hybrid Fleet to 100% Electric by 2040:** The Project has been in negotiations with potential suppliers for hybrid electric haul trucks and has developed an option to switch to 100% electric haul truck fleet by 2040 if technology is available and BC Hydro has sufficient electricity capacity in the region. The avoided diesel for the hybrid fleet is 25.8 million litres over LOM. The average annual emission reduction of 1,584 tCO₂e from 2030-2039 and 3,955 tCO₂e average annual emission reduction from 2040 to mine closure for a total emission reduction over LOM of 65,666 tCO₂e.

- **Renewable Diesel and 100% Renewable Diesel by 2040:** The Project has been working with a renewable diesel supplier to ensure potential supply and has developed an option to switch to 100% renewable diesel by 2040 if sufficient supplies are available. The average annual emission reduction of 3,249 tCO₂e from 2035 to 2040 when the Project will aim to use R20 renewable diesel and 4,817 tCO₂e from 2040 to mine closure for a total emission reduction over LOM of 74,048 tCO₂e.
- **Combination of Hybrid Fleet and Electric Drills and Shovels:** This option includes electrification of diesel-powered equipment considering both Option 2 and 3. The average annual emissions reductions is approximately 5,155 tCO₂e and LOM 113,404 tCO₂e.

4.1 Potential Emission Reductions

Figure 7 shows the year over year emissions reduction by option evaluated compared to baseline. The assessment of options to reduce emissions has identified that the project could potentially achieve an LOM average emission intensity of less than 0.0080 tCO₂e/tonne steelmaking coal.

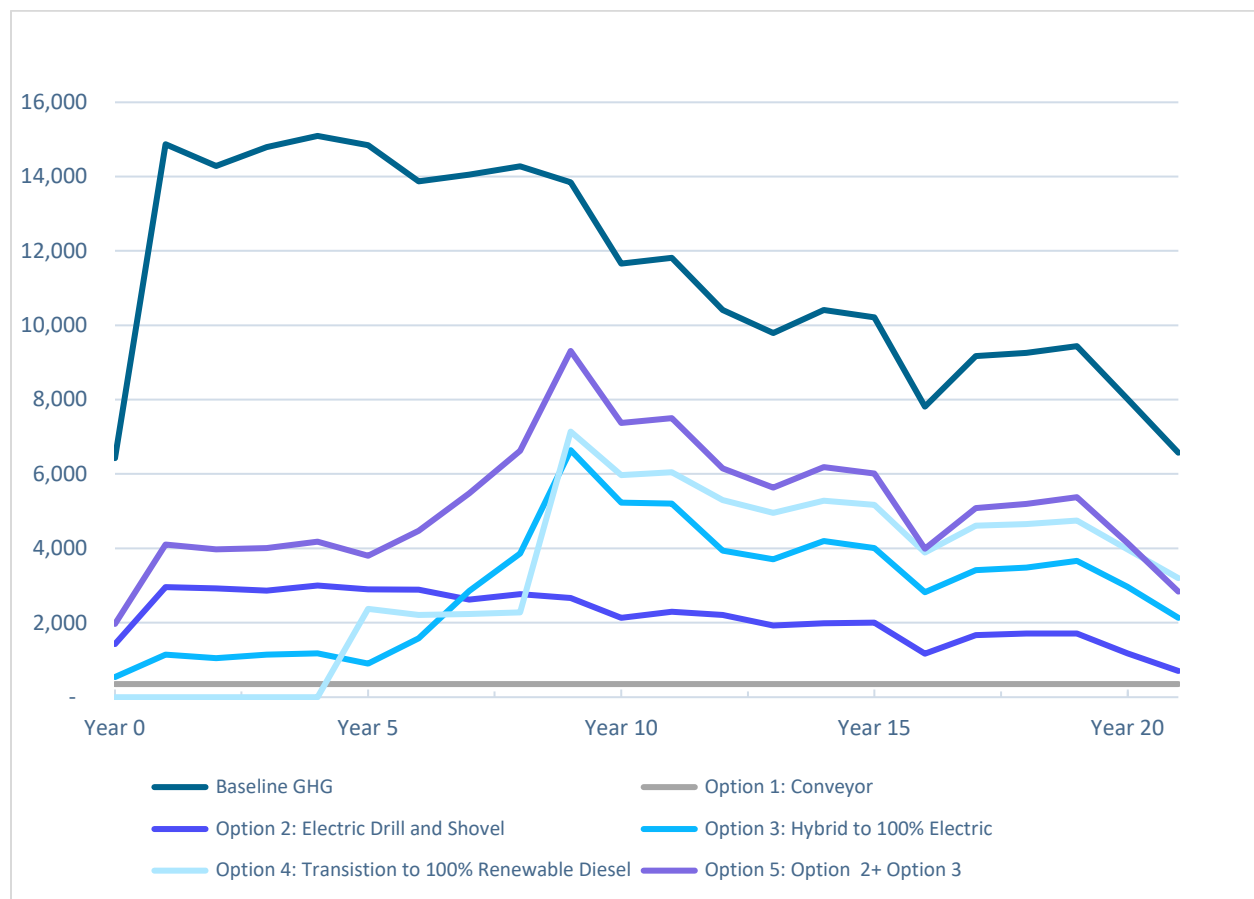


Figure 7 Year over Year Emissions Reductions by Option (tCO₂e)

5.0 Monitoring and Reporting

Industrial facilities regulated under the BC OBPS, legally, must annually measure, report, and manage their compliance emissions. This includes a mandatory annual third-party audit and adherence to data management requirements.¹⁶ Audit findings are submitted to and overseen by the BC GHG regulator.

If the Project exceeds its BC OBPS emissions performance standard, it must pay for the excess emissions as outlined in the BC OBPS framework.

The OBPS reinvests compliance payment revenues into emissions reduction initiatives. Where applicable, the Project will participate in these programs to support its own reduction goals. As a regulated facility, it will also adapt its operations to remain compliant with evolving BC OBPS requirements.

6.0 Conclusion

- The Tenas Project is expected to consistently operate below the allowable emissions threshold for a steelmaking coal mine in Canada, generating an estimated average annual surplus of 14,477 tCO₂e in compliance credit units under the BC OBPS. With this comparatively low emissions profile, the Project may be well-positioned to attract interest from steelmakers seeking lower-carbon metallurgical coal feedstock. Further analysis indicates that, with implementation of identified mitigation options, the Project could achieve a life-of-mine average emissions intensity of less than 0.008 tCO₂e per tonne of saleable coal if all options are implemented.
- Participation in the BC OBPS aligns the Project with international GHG reduction objectives
- The Project will achieve a net carbon sink status 17 years after the Post-Closure phase.
- Downstream emissions represent the largest share of the lifecycle emissions associated with steelmaking. While there is currently no viable substitute for steel in most modern industrial applications, the steel sector is actively pursuing its own emissions reduction strategies aimed at reducing emissions from the production process.
- Adopting a combination of Hybrid Fleet and Electric Drills and Shovels could reduce average estimated annual emissions by approximately 5,155 tCO₂e and LOM 113,404 tCO₂e.

¹⁶ Page 17, [B.C. Output-Based Pricing System Program and Reporting Guidance](#). "Third-party verification of the Annual Report will be required for all regulated operations. Reporting operations that emit over 25,000 tonnes of CO₂e per year will also be required to have their Annual Report verified."

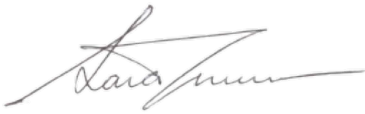
7.0 Recommendations

- Monitor and update carbon sink impact estimates throughout the life of the Project, using the forthcoming GHG Protocol Land Sector and Removals Guidance for land use change emissions, and document progress over time.
- Explore potential opportunities for domestic sales of steelmaking coal to help reduce downstream transportation-related emissions.
- Finalise emission reductions decisions and develop a Project Execution Plan.

8.0 Closure

We sincerely appreciate the opportunity to have assisted you with this project and if there are any questions, please do not hesitate to contact the undersigned by phone at 604.684.9311.

Report prepared by:
Ausenco Engineering Canada ULC



Sara Turner
EA & Permitting Specialist

Report prepared by:
Ausenco Engineering Canada ULC



Denise Mullen
Director, Strategic Projects

Appendix A

Response to Information Requests Cross Reference

Please revise the GHG emissions assessment to provide a cumulative estimate of total project-related GHG emissions over all relevant project phases, including:	
1. Construction	Section 2.0, Section 3.0
2. Operations (with expected emissions per year)	
3. Reclamation and closure	
4. Post-closure care and maintenance (as applicable).	
Please clarify whether Scope 3 emissions were considered in the GHG assessment. If they were not:	
1. Provide a rationale for their exclusion and describe any assumptions regarding coal end-use.	Alignment with CleanBC Industrial Emissions Policy is covered in Section 1.3, Section 2.1 . The project aligns with provincial and national goals.
2. Consider including a qualitative or order-of-magnitude estimate of downstream emissions (e.g., based on emissions per tonne of coal combusted for metallurgical purposes).	Section 2.3, Table 4 covers Scope 3 emissions including those from the downstream use of coal.
3. Discuss the implications of downstream emissions for climate policy alignment, especially under evolving net-zero transition expectations and CleanBC industrial climate policy.	Section 3.4
Please revise the submission to:	
1. Describe how project emissions align with the BC government’s GHG emissions reduction plans for the mining or industrial sector (as applicable).	Context and the implementation of BC OBPS, Section 1.3, 2.1, 2.5
2. Identify whether the emissions from this project have been accounted for within sectoral carbon budgets or policy assumptions under CleanBC.	Monitoring and continuous improvement covered in Section 5.0 .
3. Discuss potential trade-offs or implications for other projects or sectors if this project proceeds with the current emissions profile.	The project's emissions will count toward the provincial total. By proactively adopting a combination of emissions reductions option 5 (Section 4.0), the project helps manage cumulative emissions risk. The low emission intensity of the project will be used to compare other projects in the sector.
Please revise the submission to provide a clear and specific net-zero or emissions reduction plan for the project. This should include:	
1. Interim emissions reduction milestones (e.g., 2030, 2040)	Section 3.0, Figure 6.
2. Measures and technologies that will be implemented to reduce emissions over time	Emission-reduction technologies are discussed in Section 4.0
3. Key decision points or updates (e.g., incorporation of new technologies or regulatory changes)	Monitoring and continuous improvement covered in Section 5.0
4. Plans for monitoring progress and adapting if targets are not met.	

Where possible, provide this information in a dedicated decarbonization planning section or through an attached Net-Zero Transition Plan consistent with CleanBC guidance.	Section 4.0 and Appendix B
Please revise the GHG mitigation section to include an adaptive management framework that:	Section 5.0
1. Defines key indicators to monitor the effectiveness of mitigation measures,	
2. Identifies thresholds or targets that would trigger corrective actions	
3. Describes a process for regularly reviewing and updating mitigation plans (e.g., in response to new technologies or updated policy guidance	
4. Include engagement with regulators, Wet'suwet'en, and/or stakeholders in monitoring and updates.	
Please revise the submission to:	
1. Provide a quantitative estimate of carbon sink loss due to clearing and land disturbance, including GHGs released from soil and vegetation during project development.	See Section 3.6 for estimates of carbon sources and sinks including Table 8 and Figure 5 for sequestration loss and a discussion of sequestration/recovery during reclamation and closure.
2. Estimate the GHG sequestration potential of proposed reclamation activities (e.g., afforestation, revegetation, restorative agriculture), including timelines for achieving pre-disturbance equivalency.	
3. Discuss the time lag between carbon loss and sequestration, and its implications for the project's overall GHG profile.	
4. Consider and describe potential offset strategies, including culturally relevant offsets, to address residual or interim emissions that cannot be mitigated immediately through reclamation.	Facilities that operate below their regulated benchmark may generate surplus units or credits, which can be sold. Limited use of carbon offsets is also permitted for compliance but need to meet the requirements specified in the regulations. The Tenas Project is expected to be a covered facility under the B.C. OBPS, as outlined in the 2025 CleanBC Industrial Incentive Program. Section 1.3.

Appendix B

Net-Zero Plan Checklist and Cross Reference

Project description	
A brief qualitative explanation of the project scope	Section 1.0
Engagement with Indigenous Peoples: Early and ongoing engagement with First Nations title and rights holders and Indigenous groups should inform plans. Input received and how it has been actioned or addressed should be included in the plan.	Report is in response to indigenous information requests as part of the EA review
GHG emissions	
A quantitative description of the project's estimated annual net GHG emissions over the lifetime of the project and associated emissions intensity (EI)	Section 2.0 (methodology), Section 3.0
Must include facility emissions and acquired energy emissions	Section 2.3 exclusions https://www2.gov.bc.ca/gov/content/environment/climate-change/data/electricity Section 3.0 Results
Emissions identified must align with the project's maximum design capacity, and the expected operation capacity	Section 3.0 , emission estimates are based on the project design and intensity factors are calculated based on the estimated output of annual saleable coal following the required process and formulas outlined in the BC OBPS Guidance document https://www2.gov.bc.ca/assets/gov/environment/climate-change/ind/obps/guidance/bc_obps_guidance.pdf
A set of EI targets (and/or emission targets if EI is not relevant) at specified time intervals until the project achieves net-zero emissions	These requirements are embedded in the OBPS
Target emissions must align with the applicable net-zero target timeline based on type of facility (2030 for large new LNG facilities, or 2050 for all other facilities)	
A quantitative description of the project's estimated annual upstream GHG emissions over the lifetime of the project	Section 3.3
An assessment of the impact of the project's emissions on B.C.'s ability to meet its GHG targets.	As a project subject to the BC OBPS, the ability of the project to meet B.C. emissions targets is embedded in performance requirements established in regulation.

Technology scope. An analysis of the BATs and BEPs considered, including:	
A list of all potential GHG mitigation measures considered	Section 4.0
A list of potential GHG mitigation measures selected that are to be implemented by the project, including the following:	
The potential quantity and percentage reduction in GHGs associated with each technology or measure	
The level of technology maturity	Embedded in the choice of options explored
Planned timeline for technology implementation	Section 4.0, Figure 7 , GHG mitigation options were planned for 2040 for renewable diesel integration and electric fleet.
The potential barriers, and proposed solutions, to implementing the selected mitigation measures	The OBPS mechanism is designed to reduce mitigation barriers by OBPS revenues returning to industry in the form of projects and programs to target hard to abate emissions.
Considerations must be provided regarding the cost, geographic location, technology readiness, etc.	Section 4.0
A rationale must be provided for eliminating each technology or practice that was not selected for implementation	The Tenas project is planned to operate under the BC performance standard for coal mines.
Other GHG mitigation measures	
A description of any additional mitigation measures that will be implemented to achieve net-zero emissions targets	Corporate sustainability policies outside of the BC OBPS regulation are outside of the Tenas Project Boundary.
If applicable, this must include:	
A description of CCS technologies to be implemented	N/A
Identification of the type of eligible offset credits that will be targeted and procurement plan for acquiring those offsets	N/A
For each mitigation measure used, the percentage utilized relative to the projected total annual project emissions must be provided	The BC OBPS allows for 30% compliance units to be paid for by BC offset registry offset units or BC OBPS credit units.

Implementation plan: An outline of the project schedule including construction and operational timelines including a description of:	
The relevant data sources, assumptions, and information to support a feasible implementation plan;	The Tenas Project complies with the BC OBPS which is a key mechanism of the provincial and national Net-Zero strategy. For the Tenas Project to continue to exceed emission performance standards supportive policy is required this could include incentives for the use of renewable diesel or grants and funding opportunities from the OBPS that are applicable to the Tenas Project operations.
Factors associated with the schedule such as schedule dependencies, constraints, and risk	The project plans to begin construction in 2030 and will update GHG Management Plan as regulatory requirements or BC OBPS standards and guidance change.
Supportive actions needed (for example infrastructure needs for electrification)	CAPEX considerations for powerline upgrades to support GHG mitigation strategies were included in the project financial assessment.
The plan may describe the process the proponent will follow to make the decisions and investments needed to achieve net-zero emissions by 2050 (and 2030/2040 targets), where specific technologies are not yet certain	The current development plan of the Tenas Coal Project considers the opportunities of the BC OBPS for low emission coal production including the potential to move from a hybrid fleet to fully electric fleet by 2040 dependant on technology availability and consistent supportive policy.



Find a better way.

www.ausenco.com

Copyright © 2022 Ausenco Pty Ltd. The Ausenco name and wordmark are registered trademarks of Ausenco Pty Ltd. Ausenco refers to Ausenco Pty Ltd. and its global affiliates. All rights reserved.

Enclosure 2

NORTHERN HEALTH COMMENTS AND RESPONSES BASED ON TELKWA MINING'S RESPONSE TO TRANSITION ORDER SCHEDULE A SECTION C ITEMS 1, 2, 3, 4, 5, AND 6

Table 1: Responses to 8 September 2025 Northern Health Comments on Section 25 Transition Orders

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
1	2-Sep-25	Item 6 - The Project's greenhouse gas emissions	General	Northern Health (NH) appreciates the opportunity to provide input on the Tenas Coal EA — GHG Emissions Update for the proposed Project. We note the Project's estimated emissions — 30,939 tCO₂e annually, or 680,652 tCO₂e over the life of mine — while below regulatory thresholds, contribute to cumulative climate impacts that affect population health and the resilience of our health system. As the regional health authority serving approximately 300,000 residents across a vast geography of northern British Columbia, NH is uniquely positioned to observe and respond to the health impacts of climate change. We are committed to build[ing] a climate-resilient health system (https://www.northernhealth.ca/sites/northern_health/files/about-us/reports/strategic-service-plans/documents/northern-health-strategic-plan-2023-2025.pdf) in response to the growing health effects of climate change. NH is increasingly required to divert resources to prepare for and respond to climate-related health effects already being experienced in our region, including deteriorating air quality from wildfires, extreme heat events, flooding, and infrastructure disruptions. These risks are projected to intensify in Northern BC, placing additional strain on health services and exacerbating both acute and chronic disease burdens. Our comments reflect Northern Health's progressing and expanding work in Climate Change and Health Vulnerability and Adaptation Assessment because of mandates and a growing body of compelling evidence supporting climate and health action. We recommend the proponent (based on provincial strategies, regional reports, and emerging evidence): • Ensure alignment with provincial strategies such as the BC Climate Preparedness and Adaptation Strategy (https://www2.gov.bc.ca/assets/gov/environment/climate-change/adaptation/cpas.pdf) and the BC Ministry of Health's Risk to Resilience Report (https://climatereadybc.gov.bc.ca/pages/health). The latter emphasizes that climate change imposes significant and escalating impacts on B.C.'s communities and health system, now and into the future. There are lost lives and livelihoods, displacement, disrupted communities, and strained health services left in the wake of recent extreme heat waves, wildfires, floods, droughts, and other climate-related events. These events have also impacted supply chains, limiting access to essential supplies, health care, and medications. Delaying action comes at a high cost, as B.C.'s health system and communities will be increasingly challenged to respond to overlapping emergencies and maintain essential health functions. • Consider integrating hazard, risk and vulnerability assessments, such as from the Regional District of Bulkley-Nechako (Electoral Area A - Smithers/Telkwa Rural) (https://www.rdbn.bc.ca/application/files/7916/8609/1664/Final_HRVA_Report_EA_A-20230526SONilPEM.pdf) into planning, construction, operations and decommissioning phases to ensure long-term resilience. • While the proponent has considered the Project's potential positive or negative effects on carbon sinks, including forests, we encourage further evaluation in light of emerging evidence. A recent article by the World Resources Institute (https://www.wri.org/insights/global-trends-forest-fires?apcid=0065d91741a9a798ef87ad03&utm_campaign=wridigest&utm_medium=email&utm_source=wridigest-2025-08-26) highlights that forest fires are now a leading driver of global tree cover loss, with boreal regions—such as those in Northern BC—experiencing record-breaking fire seasons. These fires not only degrade air quality and threaten infrastructure but also compromise the carbon storage capacity of forests, potentially turning them from carbon sinks into net sources of emissions. This fire-climate feedback loop poses significant risks to both ecological and human health systems. Additional Context (from Health Canada, 2022): • Research shows that the health of Canadians has been affected by climate variability and change in recent years — both directly, when extreme heat and other natural hazards result from climate change, and indirectly, through a range of social, environmental, cultural, and economic pathways that have effects on health. • All Canadians can be affected by climate change; however, the distribution of these impacts and related health risks are not uniform. Seniors, children, racialized populations, low-income individuals, individuals with chronic health conditions, and First Nations, Inuit, and Métis peoples often experience greater health impacts of climate change.	The Tenas Coal Metallurgical project (the Project) acknowledges that collaboration with Northern Health for a climate-resilient health system an important priority. Global greenhouse gas emissions contribute to climate change and affect population health and the resilience of health systems. The Project will contribute to global greenhouse emissions; however, the potential exists to improve the resiliency of the Project through thoughtful climate change adaptation. The Project will complete a Hazard, Risk, & Vulnerability Assessment (HVRA) for the Project prior to construction. The assessment will be developed in alignment with the Emergency Management BC process to develop a HRVA and modified for application to a mine project in the permitting or design stage of development.¹ The HVRA will: • Align with provincial strategies such as the BC Climate Preparedness and Adaptation Strategy • Include localized climate data for the mine site • Identify and prioritize hazards with the co-production of knowledge • Identify potential risk reduction strategies The HRVA will inform the Tenas Mine Emergency Response Plan which will integrate climate-related risks with a disaster risk reduction perspective and The Tenas GHG Monitoring, Mitigation, and Climate Change Management Plan where the HRVA in accordance with recommended best practice will be reviewed every 5 years. The Project has a commitment to mitigate GHG emissions occurring from the Project and will develop adaptation measures for the Project that include connecting adaptation to health benefits or “co-benefits” for the Project and community because of mitigation and adaptation efforts.

¹ The current online tool is designed and available for use by Indigenous communities and Local Authority representatives.

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
				Measures taken in many sectors to mitigate climate change (by reducing GHGs or sequestering carbon) or to adapt to climate change can also have very large benefits for health — immediately or in the long term. These “co-benefits” of climate change mitigation and adaptation add to the value of action taken and can avoid poor health outcomes and economic costs to health systems and society [10.6]. Economic savings from such actions can also help to offset the costs to society of reducing GHGs. (https://changingclimate.ca/health-in-a-changing-climate/chapter/10-0/) Berry, P., & Schnitter, R. (Eds.). (2022). Health of Canadians in a Changing Climate: Advancing our Knowledge for Action. Ottawa, ON: Government of Canada. Government of Canada Publications (https://publications.gc.ca/collections/collection_2022/sc-hc/H129-121-2022-eng.pdf)	
2	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	1. Introduction	It says the mine life will be approximately 25 years. Due to the recent change in project ownership, could TML please provide a detailed timeline (including start and end dates) for both the construction and operational phases of the project? We are particularly interested in understanding whether the project schedule may align with other foreseeable developments that could potentially compete for workforce, accommodations, and community infrastructure and services. For example, the North Coast Transmission Line Phase 2—which passes through Telkwa—is currently anticipated to be operational by mid-2031.	The current Project timeline is: - Enter Effects Assessment in Q4, 2025 - Certificate Decision Q2, 2026 - Permit Applications Lodged End of 2026 - Permits Granted Q4 2027 - Construction starts in 2028 - First Coal in late 2028 While there are other Projects planned, these are committed to using dedicated work camps and should not affect the availability of hotels. Telkwa Mining is in contact with BC Hydro to mitigate potential overlaps if possible. This assessment was part of the EAC Application.
3	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	3.1.1.1 Potential Effects	The first sentence in the opening paragraph presents a series of predicted job figures. Could you please revisit the figures? It appears the calculation for construction phase was based on the "Employment (jobs)" column in Table 5.2-1. However, since the paragraph refers to full-time equivalents (FTEs), we should instead use the "Employment (FTEs)" column for accuracy. Using the FTE data, the revised figures would be: Direct: 160.0 + 135.8 = 295.8 FTEs Indirect: 25.1 + 129.1 + 75.9 = 230.1 FTEs Induced: 18.2 + 56.5 + 55.1 = 129.8 FTEs Additionally, the figures for the operations phase appear to have been derived from Table 5.2-2 (Jobs). To maintain consistency, the calculations should instead reference Table 5.2-3 (FTEs).	Telkwa Mining agrees with these changes, the error has been acknowledged and addressed in the revised Environmental Assessment Transition Order Supplemental Report (Version 3.0; Appendix 2).
4	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	3.3.1.1 Potential Effects	Thank you for highlighting the uncertainty in budget allocation. Northern Health facilities located near the project may not necessarily benefit from increased revenue and could, in fact, be negatively impacted—particularly if the workforce’s non-occupational, non-urgent health care needs are not well-managed. These needs typically represent approximately 80–90% of total health care demand, with the remaining 10–20% being occupational and urgent, based on monitoring data from other EA projects. Therefore, I respectfully disagree with the conclusion that a positive effect is predicted. Community infrastructure and services encompass a broad and diverse range of components. It would be overly simplistic to characterize the overall impact as uniformly positive. At a minimum, the conclusion should acknowledge the potentially disproportionate distribution of effects across different sectors and regions.	Please refer to the BC EAO EAC Application, Section 6.0 Social Effects Assessment, Chapter 3 (Infrastructure and Services Valued Component)² for the assessment of adverse effects on community infrastructure. In accordance with the requirements of the Transition Order (BC EAO 2022)³, the revised Environmental Assessment Transition Order Supplemental Report (Version 3.0; Appendix 2, Section 3.1.1.1) identifies new positive effects.
5	4-Sep-25	Items 1, 2, 5 - Positive	3.3.1.2 Mitigation Measures	Northern Health has consistently raised concerns that the existing conditions described for health services do not adequately reflect the capacity challenges in the region, and that the residual effects on health services	Telkwa Mining is committed to implementing the HMSP developed by TCL. The HMSP is a living document that is reviewed every two years and will

² TCL. 2022a. BC EAO Application for the Tenas Project – Section 6.0 Social Effects Assessment Chapter 3 Infrastructure and Service Valued Component. May 2022. Retrieved at: https://projects.eao.gov.bc.ca/api/public/document/627c1f340df8410022b077f3/download/06.3_InfraServ_May2022-.pdf

³ BC EAO. 2022. Transition Order under Section 78(7). December 2022. Retrieved at: https://projects.eao.gov.bc.ca/api/public/document/639ce258f66bcd00222e8f1e/download/Tenas_Transition_Order_Dec%2016%2C%202022_FINAL.pdf

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
		Effects to Indigenous, Indirect Effects, Land Use Plans		have not been accurately assessed or described. In response to these concerns, the previous project proponent, Telkwa Coal Ltd. (TCL), made a series of commitments regarding the Health and Medical Services Plan (HMSP) to mitigate residual effects (see NH-22 in the Master Issues Tracking Table). TCL also expedited the drafting of an HMSP for Northern Health’s review. Given the change in ownership, it is critical that the new proponent, TML, is made aware of the HMSP-related commitments and the draft HMSP prepared by TCL. Lastly, it is important to note that health system capacity is not static—it has been fluctuating and, in some areas, deteriorating. The assessment conducted in 2022 does not necessarily reflect the current situation, nor does it account for the anticipated conditions when the project enters the construction phase.	be reviewed during the permitting process and upon the decision to construct the Project to ensure it reflects the current situation of the health system in the region. This will include engagement with NH to ensure their feedback is incorporated.
6	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	3.3.2.2 Additional Mitigation Measures	Could you please clearly identify the present and foreseeable projects? It is not reasonable to assume that these projects would have similar enhancement measures in place without understanding their presence, scope of capital investment, workforce size, and specific mitigation strategies. For example, we are currently aware of two foreseeable projects: 1. The North Coast Transmission Line, which passes through Telkwa and may include a camp near the community. 2. The Prince Rupert Gas Transmission project near Houston, for which camp locations have not yet been shared with us. Both projects are expected to have some level of impact on community infrastructure and services, including health and medical services. Therefore, further research is needed to better understand these projects and to provide a more accurate estimate of their cumulative effects.	The list of past, present, and reasonably foreseeable future projects are found on Page 34 of the Application Information requirements (BC EAO 2022⁴) and Section 5.0, Chapter 1, Table 6-1 in the EAC Application (TCL 2022b⁵). Telkwa Mining will revisit mitigation measures during the permitting process, once there is a clearer understanding of the intended camp setups and construction timelines for these two Projects, which were not foreseeable in 2020.
7	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	Table 2: Response to 15 May 2025 to Office of the Wet’suwet’en Comments on Section 25 Transition Orders	Regarding TML’s response to OW-181: While Northern Health has consistently advocated for closed camps for EA projects to the greatest extent possible, we understand that both TCL and TML may prefer to house workers within communities. Given your commitment to providing transportation from various towns, it is important to highlight the risks associated with shuttle bus services, particularly in relation to accidents and malfunctions. Emergency preparedness and response planning must explicitly account for potential shuttle bus incidents. To illustrate the importance of this issue and clarify Northern Health’s expectations for project proponents, we refer you to a letter from Northern Health addressed to Coastal GasLink regarding the June 2023 bus incident. This letter is included in Appendix E of SEEMP Status Report No. 11, available at: https://www.coastalgaslink.com/siteassets/pdfs/about/regulatory/cgl-seemp-status-report-no-11.pdf	Telkwa Mining will add this aspect to accidents and malfunctions during the permitting process. The MERP will also be updated to include improvements from NH that were provided in their letter on the bus incident.
8	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	3.4.3 Mental Health	The discussion focused on women employed by the project. However, what about women who are not directly employed, but whose partners work shift jobs at the project?	Section 3.4.3 Mental Health of the Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Appendix 1) has been updated to include a discussion around the potential mental health effects of the Project on women whose partners work shift jobs at the Project with the following text: <i>“The mental health effects of working conditions in resource projects may extend beyond workers to affect their partners and children, particularly women (Manning et al., 2018; J. Shandro, 2014). Women whose partners are employed in resource projects are more vulnerable to emotional distress associated with prolonged partner absences from long shift rotations. The responsibility of managing childcare and housework during these periods can contribute to increased stress levels and social isolation.”</i> Telkwa Mining is committed to implementing an Employee and Family Assistance Program to address mental health effects on workers' partners, including women, and their children (see Table 8 in the report).

⁴ BC EAO. 2022. Application Information Requirements – Tenas Project. January 2022. Retrieved from: https://projects.eao.gov.bc.ca/api/public/document/61eb407fd72e0e0022f2693f/download/Tenas%20Application%20Information%20Requirements_FINAL.pdf

⁵ TCL. 2022b. BC EAO Application for the Tenas Project – Section 5.0 Social Effects Assessment Chapter 1 Labour Market Valued Component. May 2022. Retrieved at: https://projects.eao.gov.bc.ca/api/public/document/627c1e960df8410022b077b0/download/05.1_LabMark_May2022-.pdf

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
9	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	The revised intersectional mitigation under the theme of "employment and income, mental health" mentions the development of support groups. Could you clarify what these groups are? Are you referring to the ones listed in Table 1?	Telkwa Mining will develop support groups at the mine for the equity-deserving populations such as Indigenous persons, women, and 2SLGBTQI+ to provide a safe space to discuss concerns and provide input to Telkwa Mining, particularly regarding strategies to reduce barriers or other issues related to employment and training. Telkwa Mining will involve community service providers such as those identified in Table 1 of the Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Appendix 1) when developing these support groups. The support groups will likely meet on a quarterly basis in Telkwa or alternative convenient location.
10	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	The key mitigation measures under the theme of "housing, mental health" mention a phased ramp-up of the workforce. Northern Health would like to share our experience from other EA projects, where we observed significant deviations between the forecasted and actual non-local/regional workforce sizes, as well as the timing of employee ramp-up and peak periods. In several cases, project proponents housed workers outside of designated camps (e.g., in hotels, motels, or trailers) or amended their Environmental Assessment Certificate (EAC) to increase camp capacity. Although the Tenas Project does not include a worker camp, it could face similar challenges in securing appropriate housing for workers if actual conditions differ from forecasts. It is therefore critical for TML to closely monitor workforce trends and respond proactively to avoid adverse outcomes.	Telkwa Mining agrees with this comment. The Project's Socio-Economic Management Program (SEMP) includes a monitoring program that will proactively track trends in workforce demographics and location. This information will enable Telkwa Mining to implement additional follow-up mitigations and address potential challenges in securing housing for workers (Table 6.2-14 in the SEMP).
11	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Regarding key mitigation measures of "construction workforce accommodation": Please be mindful of other projects currently underway or planned in the area and avoid creating impacts on the normal housing needs of local/regional residents and tourists, while still supporting opportunities to increase revenue for local businesses.	Telkwa Mining agrees with this comment and is contact with the two projects currently in the planning stage with the goal of determining appropriate mitigations and coordination of engagement with local communities to reduce impacts from the cumulative effect of the projects.
12	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	The revised intersectional mitigation under the theme of "food security" mentions a breakfast program at schools. Thank you for offering support and funding. If TML or the school requires assistance with the details of implementing a breakfast program, Northern Health has resources available, including dedicated webpages and population health dietitians who can support planning and delivery. More information is available at: https://www.northernhealth.ca/health-information/healthy-eating-school	Telkwa Mining appreciates the information and looks forward to collaborating with Northern Health in the delivery of these important programs.
13	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Some EA mining projects in the North—such as Blackwater Gold—have implemented similar initiatives, and it may be beneficial for TML to connect with them to learn more about program delivery and outcomes before allocating resources. While the intent of this initiative is commendable, it is important to ensure that regular review of outcomes are built into the process to inform updates or revision to the program as needed.	Telkwa Mining agrees with this statement and will connect with Blackwater Gold on this topic. Telkwa Mining will add a component to the SEMP related to the provision of support and funding for breakfast programs at Telkwa Elementary and/or Witset School during the Operation phase. The SEMP will include a monitoring program to track and review outcomes and mechanisms to adapt the program to changing conditions as needed. The program is contingent on securing government and/or non-government partners to assist with 50% of program delivery.
14	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Regarding key mitigation measures under the theme of "employment and income, childcare": Northern Health would like to remind TML that the commitment to fund two full-time positions at approved childcare facilities was made at least three years ago. It is critical to ensure that, when construction or operations begin, this need still exists within the community. Once this prescriptive commitment is recorded as an Environmental Assessment Certificate (EAC) condition, it may become cumbersome to alter—particularly if the need for daycare staff no longer exists or proves difficult to fulfill. Northern Health does not object to this well-intended commitment but would like to kindly remind TML of the importance of maintaining flexibility.	Telkwa Mining appreciates the input from Northern Health and agrees that EAC conditions should maintain flexibility.

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
15	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Please describe the Tenas Mine Advisory Committee, including the criteria for becoming a member, its purpose, scope, and meeting frequency.	Telkwa Mining will engage with the local community(ies) and Indigenous Nations during the permitting phase to confirm the makeup and terms of reference of the committee. Currently, Telkwa Mining envisions the Tenas Mine Advisory Committee (TMAC) to comprise approximately 13 members including Indigenous Nations (i.e., Office of the Wet'suwet'en, Wet'suwet'en First Nation, Witset First Nation, Kwen Bea Yex House, Cas'Yex House), town councils and local citizen groups (i.e., Smithers Town Council, Telkwa Town Council, What Matters in Our Valley, Houston Town Council), Regional District of Bulkley Nechako, Bulkley Valley Community Resources Board, and Telkwa Mining (Telkwa Mining Senior Leadership Team Member). Telkwa Mining is happy to include Northern Health in the TMAC upon request. To join the TMAC one must be an active member of one of the groups identified above. Members will serve for a term of three to five years and can serve multiple terms. The purpose of the TMAC is to provide independent, high-level oversight of mine related activities and an alternative channel for the public to express concerns and/or comment on mine activities and effects. The scope of the TMAC includes: • providing information on key aspects of the operation that overlaps with community (i.e., Indigenous, safety, socio-economic, and community, human resources, environmental, tourism, and other business • review of complaints and other feedback identified or designated as high priority; • review of safety and/or environmental incidents or issues identified or designated as high priority; • participation in tour(s) of the operation; • providing a forum or mechanism for Indigenous groups and the public to provide feedback; • guidance and advice on appropriate response(s) to received input from Indigenous groups and the public; • notifications to Indigenous groups and the public on any substantive changes in project activities during construction and/or operation; and • providing feedback and advice to the Collaborative Governance Steering Committee. The TMAC will meet at minimum twice per year.
16	8-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 9: Intersectional monitoring, management, and evaluation measures - SEMP	This table outlines numerous monitored indicators included in the SEMP. NH would like to remind TML that the draft HMSP, developed by the previous project proponent (TCL), also contained a substantial number of monitored indicators. To ensure we're aligned on what has already been agreed upon, I will share the most recent draft HMSP currently available.	Telkwa Mining is committed to implementing the HMSP as developed by TCL and looks forward to working with NH to confirm alignment on the previously agreed to monitoring indicators.

November 24, 2025

Stasia Ferbey, B.Sc.
Project Assessment Director
BC Environmental Assessment Office

SUBJECT: Telkwa Mining's Response to the Environmental Assessment Office's (EAO) Items 1, 2, and 5, of Section C in Schedule A of the Transition Order Issued on 16 December 2022 for the Tenas Project

Dear Stasia,

Telkwa Mining Limited (Telkwa Mining; previously Telkwa Coal Limited) is submitting the attached **final** response report (**Enclosure 1**) in fulfillment of Items 1, 2, and 5 of Section C in Schedule A of the Transition Order issued on 16 December 2022. The Transition Order, Items 1, 2, and 5 of Section C in Schedule A, required the following:

C. Additional information to address Section 25(1) and Section 25(2) of the Act:

- 1. Any positive effects to Indigenous interests or Indigenous Nations that are anticipated as a result of the Project.*
- 2. The positive and negative indirect effects of the Project, including:*
 - a. Long-term trends (e.g., changing environment, cumulative impacts of development, employment, and technology) and market fluctuations;*
 - b. Anticipated positive effects, any uncertainties related to those effects, how those effects will be monitored and, in the event those effects prove to be negative, in whole or in part, how the negative effects will be adaptively managed, mitigated, and in the case of impacts to Indigenous interests, accommodated.*
- 5. A description of how the Project is consistent with any land use plan of the government or an Indigenous Nation.*

Telkwa Mining contracted ERM Consultants Canada Ltd. (ERM) to prepare the Supplemental Response Report (the report) in response to the above Transition Order requirements. A draft of the report was provided to the the Office of the Wet'suwet'en (OW) in November 2024, and feedback was requested. The report was also submitted to the BC Environmental Assessment Office (EAO) in March 2025 and feedback was requested. Since these submissions, Telkwa Mining received additional information from the OW and the attached report (**Enclosure 1**) has been **updated** to incorporate this information. In particular, the attached report (**Enclosure 1**) has been

updated to indicate where supplemental information will be provided by the OW in its Rights Impact Assessment, Cultural Use, and Cultural Well Being studies, which are expected to be finalized in 2025. Telkwa Mining understands that this supplemental information from the OW will also inform the EAO's Effects Assessment. Telkwa Mining is committed to continuing to work with the OW to incorporate information it provides into ongoing Project development.

OFFICE OF THE WET'SUWET'EN COMMENTS

The OW has provided Telkwa Mining with the following submissions that included comments on the report submitted in November 2024/March 2025:

- 28 February 2025 letter with the subject *"Office of the Wet'suwet'en Response to Telkwa Mining Limited's November 28, 2024, Letter re: IR Status"*;
- 12 March 2025 letter with the subject *"Information Requests Regarding Impacts to Caribou and Aquatic Resources for the Tenas Coal Project"*; and
- 15 May 2025 email with the subject *"Section 25 IR Response – OW Review"*.

Telkwa Mining has prepared a memo for the OW, which provides responses to the comments provided in these three letters in **Enclosure 2**. This is a tracking table with the OW's comments and Telkwa Mining's responses.

OTHER REVIEWER COMMENTS

Nothorn Health and the Fossil Management Branch who are reviewers from the Tenas Project Technical Working Group also provided comments on this report. Their comments and TML responses are provided in **Enclosures 3 and 4**. ERM updated the report to reflect these comments as well and **Enclosure 1** is the final updated report related the fulfillment of Items 1, 2, and 5 of Section C in Schedule A of the Transition Order issued on 16 December 2022.

CLOSING

Telkwa Mining is submitting the enclosed information in fulfillment of Items 1, 2, and 5 of Section C in Schedule A of the Transition Order. The intent is for this information to support the EAO advancement of the Tenas Project to the Effects Assessment Phase, and the development of the EAO's Effects Assessment Report, draft Certificate and recommendations.

Telkwa Mining understands that the OW is completing their Assessment Process. Telkwa Mining is committed to continuing to work with the OW throughout project development to appropriately integrate the OW's information and ongoing participation in the Tenas Project.

Where additional responses are appropriate, Telkwa Mining will provide supplemental information to both the EAO and the OW.

Sincerely,



Daniel J. Farmer, P.Eng.
Project and Development Manager
Telkwa Mining Limited
Email: dan.farmer@telkwa-mining.ca
Phone: +778 643 2843
Cell: +604 220 5703

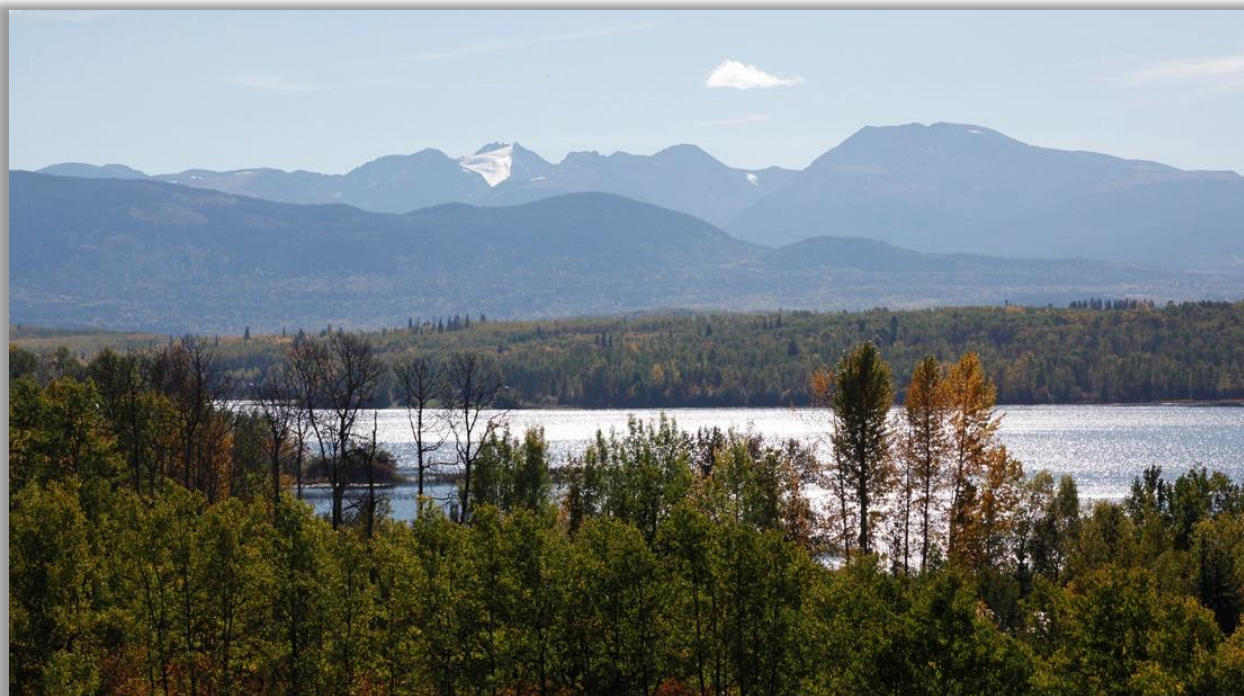
Cc. Jessy Chaplin, File

ENVIRONMENTAL ASSESSMENT OFFICE AND OFFICE OF THE WET'SUET'EN INFORMATION REQUESTS

- Enclosure 1: Tenas Project Environmental Assessment – Supplemental Response, Prepared in Fulfillment of Transition Order Schedule A Section C Items 1, 2, and 5, ERM Version 3
- Enclosure 2: Tenas Project Environmental Assessment—Telkwa Mining's Responses to the Office of the Wet'suwet'en's Comments provided in
- 28 February 2025 letter with the subject "Office of the Wet'suwet'en Response to Telkwa Mining Limited's November 28, 2024, Letter re: IR Status";
 - 12 March 2025 letter with the subject "Information Requests Regarding Impacts to Caribou and Aquatic Resources for the Tenas Coal Project"; and
 - 15 May 2025 email with the subject "Section 25 IR Response – OW Review"
- Enclosure 3: Northern Health Comments and Responses based on Telkwa Mining's Response to Transition Order Schedule A Section C Items 1, 2, 3, 4, 5, and 6
- Enclosure 4: Fossil Management Branch Comments and Responses based on Telkwa Mining's Response to Transition Order Schedule A Section C Items 1, 2, 3, 4, 5, and 6

Enclosure 1

TENAS PROJECT ENVIRONMENTAL ASSESSMENT – SUPPLEMENTAL RESPONSE, PREPARED IN FULFILLMENT OF TRANSITION ORDER SCHEDULE A SECTION C ITEMS 1, 2, AND 5, ERM VERSION 3



Tenas Metallurgical Coal Project

Environmental Assessment Transition Order Supplemental Report

September 2025

Version 3

Submitted to:	Environmental Assessment Office
Pursuant to:	Prepared in Fulfillment of Transition Order Schedule A Section C Items (1), (2), and (5)
Submitted by:	Telkwa Mining Limited, a wholly owned subsidiary of Bathurst Resources Limited Suite 1410 – 409 Granville Street Vancouver, BC V6C 1T2

SIGNATURE PAGE

Tenas Metallurgical Coal Project

Environmental Assessment Transition Order Supplemental Report

September 2025

Original signed

Krystle Batiuk

Regulatory Lead, ERM Consultants Canada Ltd.

Original signed

Klaudia Sieminska

Economics Lead, ERM Consultants Canada Ltd.

Original signed

Nathan Braun

Partner, ERM Consultants Canada Ltd.

Telkwa Mining Limited, a wholly owned subsidiary of
Bathurst Resources Limited
Suite 1410 – 409 Granville Street
Vancouver, BC V6C 1T2

EXECUTIVE SUMMARY

OW provided comments on the initial version of this report between February 28 and March 12, 2025. Telkwa Mining Limited (TML) has provided responses to all Office of the Wet'suwet'en (OW) comments in the *TML BC EAO OW Information Requests (IR) for the Tenas Coal Project* tracking table (issued July 2025). Based on the OW's comments, this report has been annotated to clearly identify where comments indicated that additional information may be provided by OW that may be considered by the EAO.

TML looks forward to the opportunity to speak with House members and OW to better understand concerns regarding labour, economic development and Indigenous land use planning.

The following OW comments indicated that additional information may be provided by OW that is related to sections of this *Environmental Assessment Transition Order Supplemental Report*:

- OW-001 (Section 3.1 and 3.2)
- OW-004 (all Sections)
- OW-170 (Section 4.2)
- OW-176 (Section 3.1)
- OW-179 (Section 3.1)
- OW-186 (Section 4.2)

Telkwa Mining Limited (TML), a wholly owned subsidiary of Bathurst Resources Limited, is proposing to develop the Tenas Metallurgical Coal Project (the Project), a surface coal mine located about 25 kilometres (km) south of the town of Smithers and 7 km southwest of the village of Telkwa in northwestern British Columbia (BC).

The Project entered the BC Environmental Assessment (EA) process under BC *Environmental Assessment Act*, SBC 2002, c 43 (EAA 2002; Government of BC 2002) on November 6, 2018. In May 2022, Telkwa Coal Limited (TCL; now TML) submitted an Environmental Assessment Certificate (EAC) Application to the BC Environmental Assessment Office (EAO), under the EAA 2002. On December 16, 2019, the *Environmental Assessment Act*, SBC 2018, c.51 (EAA 2018; Government of BC 2018) was brought into force and projects that did not complete their assessment within three years were required to continue their assessment under the EAA 2018.

A Transition Order under section 78(7) of the EAA 2018 was issued by the BC EAO on December 16, 2022. The Transition Order requires that the EA process continue under the EAA 2018 and describes the scope of additional information that must be provided to inform this assessment.

This Environmental Assessment Transition Order Supplemental Report (Supplemental Report) addresses items (1), (2), and (5) in Section C of Schedule A of the Transition Order, which require TML to provide additional information on:

1. *Any positive effects to Indigenous interests or Indigenous nations that are anticipated as a result of the Project.*
2. *The positive and negative indirect effects of the Project, including:*
 - a. *Long-term trends (e.g., changing environment, cumulative impacts of development, employment, and technology) and market fluctuations.*
 - b. *Anticipated positive effects, any uncertainties related to those effects, how those effects will be monitored and, in the event those effects prove to be negative, in whole or in part, how the negative effects will be adaptively managed, mitigated, and in the case of impacts to Indigenous interests, accommodated.*
5. *A description of how the Project is consistent with any land-use plan of the government or an Indigenous nation.*

ASSESSMENT APPROACH

This Supplemental Report considers Schedule A Section C items (1), (2a), and (2b) of the Transition Order in relation to the environmental, economic, social, heritage, and health Valued Components (VCs) that were assessed in the EAC Application.

The VCs included in this Supplemental Report are as follows:

- Atmospheric Environment;
- Terrain and Soils;
- Surface Water;
- Groundwater;
- Aquatic Resources;
- Fish and Fish Habitat;
- Vegetation;
- Wildlife;
- Avian Species;
- Labour Market;
- Economic Development;
- Demographics;
- Visual Resources;
- Infrastructure and Services;
- Land and Resource Use;

- Community Well-being;
- Heritage Resources;
- Human Health; and
- Wet'suwet'en Rights and Interests.

The VCs listed above were screened for new potential positive or negative indirect effects that were not previously assessed in the EAC Application.

In total, three new effects were identified, two in relation to Section C item (1), and one in relation to Section C item (2b). No new effects were identified in relation to Section C item (2a). The effects assessments follow the methodology described in the EAC Application and are aligned with the recommended guidelines and legislated requirements pursuant to the EAA 2018.

The following is a summary of the effects assessments in response to each Transition Order item.

EFFECTS ASSESSMENT SUMMARY

SCHEDULE A SECTION C (1): POSITIVE EFFECTS TO INDIGENOUS INTERESTS OR INDIGENOUS NATIONS

The Transition Order Schedule A Section C item (1) requires additional information on any positive effects of the Project to Indigenous interests or Indigenous nations that are anticipated because of the Project.

Two new positive effects related to this Transition Order requirement were identified for two VCs:

- **Labour Market:** Increase in employment, income, and skill level for Indigenous employees during the Project's Construction and Operation phases. The Project is expected to increase direct Indigenous employment opportunities, indirect Indigenous employment opportunities with Project suppliers (with these impacts spanning the entire supply chain), and/or induced Indigenous employment opportunities (those resulting from direct and indirect Indigenous employees spending their income in industries such as retail, transportation, real estate, and entertainment). This increase in the direct, indirect, and induced Indigenous employment opportunities can lead to an increase in personal income for Indigenous employees. It can also lead to an increase in skill levels for Indigenous employees through upskilling to qualify for jobs, on-the-job training, and work-related experience. The positive effect is carried through the assessment and rated as **Low Magnitude, Long-term Duration, and Not Significant**.
- **Economic Development:** Increase in business opportunities for Indigenous businesses during the Project's Construction and Operation phases. The Project is expected to increase direct contract opportunities awarded to Indigenous businesses, indirect contract opportunities with Project suppliers (with these impacts spanning the entire

supply chain), or induced contract opportunities (i.e., those resulting from direct and indirect Indigenous employees spending their income in industries such as retail, transportation, real estate, and entertainment). This increase in direct, indirect, and induced Indigenous business opportunities can lead to higher revenue for Indigenous businesses if such contracts are awarded, further leading to the growing business capacity of Indigenous businesses. The positive effect is carried through the assessment and rated as **Low Magnitude, Long-term Duration, and Not Significant**.

SCHEDULE A SECTION C (2A): LONG-TERM TRENDS AND MARKET FLUCTUATIONS

The Transition Order Schedule A Section C (2a) requires additional information on any positive and negative indirect effects of the Project, including long-term trends (e.g., changing environment, cumulative impacts of development, employment, and technology) and market fluctuations.

The EAC Application considers long-term trends and market fluctuations in the VC effects assessments. Potential developments and activities that can cumulatively interact with the Project are in the VC Cumulative Effects Assessments (CEA) of the EAC Application. As such, new potential effects are not predicted, and further assessment was not warranted for any of the assessed VCs.

SCHEDULE A SECTION C (2B): POSITIVE EFFECTS AND UNCERTAINTIES

The Transition Order Schedule A Section C (2b) requires additional information on any positive and negative indirect effects of the Project, including anticipated positive effects, any uncertainties related to those effects, how those effects will be monitored and, in the event those effects prove to be negative, in whole or in part, how the negative effects will be adaptively managed, mitigated, and in the case of impacts to Indigenous interests, accommodated.

One new positive effect related to this Transition Order requirement was identified:

- Infrastructure and Services: Improved community infrastructure and services during the Project's Operation phase. The Project may lead to improved community infrastructure and services because of the increased gross domestic product and tax revenue from the Project. Initial improvements to community infrastructure and services would mitigate the effects of increased demand from the Project. The positive effect is carried through the assessment and rated as **Low Magnitude, Long-term Duration, and Not Significant**.

LAND USE PLANNING SUMMARY

With respect to the Transition Order Schedule A Section C item C (5), the Project is consistent with all relevant land use plans from federal, provincial, and local (i.e., regional districts and municipal) governments and Indigenous nations that overlap with the Project and Land and Resource Use VC Local Study Area (LSA) and Regional Study Area (RSA).

Based on the analysis of federal, provincial, and local government land use plans, this Supplemental Report provides additional description of the following:

- Resource Management Zones (RMZs) and Sub-unit 7-1 from the Bulkley Land and Resource Management Plan (Government of BC 1998) and the Summer Recreational Access Management (BVCRB 2013);
- Spatial overlap with the Project Area and the Land and Resource Use LSA from the Bulkley Valley Sustainable Resource Management Plan (Government of BC 2005);
- RMZ overlap with the Land and Resource Use RSA from the Morice Land and Resource Management Plan (Government of BC 2007); and
- Land designation overlap with the Project Area from the Smithers Telkwa Rural Official Community Plan (RDBN 2014).

Based on the analysis of land use plans of Indigenous nations, this Supplemental Report provides additional description of the following:

- Jean Baptiste 28 reserve, overlapping with the Land and Resource Use RSA, on the Witset First Nation Community Land Use Plan (Witset First Nation 2018a); and
- the Widzin Kwah Water Sustainability Project, overlapping with the Land and Resource Use RSA, and its nine Guiding Principles (WWSP 2023).

The areas addressed by the land use plans of two Indigenous nations do not directly overlap the Project and the values managed by these land use plans are not predicted to be affected by the Project. The regions in both Indigenous nation land use plans are also not connected hydrologically to the Project.

TABLE OF CONTENTS

EXECUTIVE SUMMARY	I
ACRONYMS AND ABBREVIATIONS	IX
1. INTRODUCTION	1-1
2. ASSESSMENT APPROACH.....	2-1
2.1 METHODS	2-1
2.2 SCREENING FOR POTENTIAL EFFECTS	2-1
3. EFFECTS ASSESSMENT	3-1
3.1 LABOUR MARKET	3-1
3.1.1 Assessment of Project Effects.....	3-1
3.1.1.1 <i>Potential Effects</i>	3-1
3.1.1.2 <i>Mitigation Measures</i>	3-2
3.1.1.3 <i>Residual Effects and Significance</i>	3-2
3.1.2 Assessment of Cumulative Effects	3-4
3.1.2.1 <i>Potential Cumulative Effects</i>	3-4
3.1.2.2 <i>Additional Mitigation Measures</i>	3-5
3.1.2.3 <i>Residual Cumulative Effects and Significance</i>	3-5
3.2 ECONOMIC DEVELOPMENT	3-7
3.2.1 Assessment of Project Effects.....	3-7
3.2.1.1 <i>Potential Effects</i>	3-7
3.2.1.2 <i>Mitigation Measures</i>	3-8
3.2.1.3 <i>Residual Effects and Significance</i>	3-9
3.2.2 Assessment of Cumulative Effects	3-11
3.2.2.1 <i>Potential Cumulative Effects</i>	3-11
3.2.2.2 <i>Additional Mitigation Measures</i>	3-12
3.2.2.3 <i>Residual Cumulative Effects and Significance</i>	3-12
3.3 INFRASTRUCTURE AND SERVICES	3-14
3.3.1 Assessment of Project Effects.....	3-14
3.3.1.1 <i>Potential Effects</i>	3-14
3.3.1.2 <i>Mitigation Measures</i>	3-15
3.3.1.3 <i>Residual Effects and Significance</i>	3-16

3.3.2	Assessment of Cumulative Effects	3-18
3.3.2.1	<i>Potential Cumulative Effects</i>	3-18
3.3.2.2	<i>Additional Mitigation Measures</i>	3-18
3.3.2.3	<i>Residual Cumulative Effects and Significance</i>	3-18
4.	LAND USE PLANNING	4-1
4.1	FEDERAL, PROVINCIAL AND LOCAL LAND USE PLANS	4-1
4.1.1	Bulkley Land and Resource Management Plan	4-2
4.1.1.1	<i>Summer Recreational Access Management Plan</i>	4-5
4.1.2	Bulkley Valley Sustainable Resource Management Plan	4-6
4.1.3	Morice Land and Resource Management Plan	4-7
4.1.4	Smithers Telkwa Rural Official Community Plan	4-8
4.2	INDIGENOUS NATION LAND USE PLANS	4-9
4.2.1	Jean Baptiste 28 Reserve – Witset First Nation Community Land Use Plan	4-10
4.2.2	Widzin Kwah Water Sustainability Project	4-10
5.	REFERENCES	5-1

LIST OF TABLES

Table 2.2-1:	Summary of Screening for New Potential Effects by Valued Component	2-2
Table 2.2-2:	Screening Rationale by Valued Component	2-3
Table 3.1-1:	Summary of Residual Effect Characterization for an Increase in Employment, Income, and Skill Level for Indigenous Employees	3-3
Table 3.1-2:	Summary of Residual Cumulative Effect Characterization for an Increase in Employment, Income, and Skill Level for Indigenous Employees	3-5
Table 3.2-1:	Summary of Residual Effect Characterization for an Increase in Business Opportunities / Contracts to Indigenous Businesses	3-10
Table 3.2-2:	Summary of Residual Cumulative Effect Characterization for an Increase in Business Opportunities / Contracts to Indigenous Businesses	3-12
Table 3.3-1:	Summary of Residual Effect Characterization for Improved Community Infrastructure and Services	3-16

Table 3.3-2:	Summary of Residual Cumulative Effect Characterization for Improved Community Infrastructure and Services	3-18
Table 4.1-1:	Relevant Information in the EAC Application and this Supplemental Report for Federal, Provincial, and Local Land Use Plans.....	4-1
Table 4.1-2:	Bulkley Land and Resource Management Plan, Sub-unit 7-1, Bulkley Valley Integrated Resource Management Zone Management Categories and Specific Directions.....	4-3
Table 4.1-3:	Bulkley Valley Sustainable Resource Management Plan: Resource Values	4-7
Table 4.1-4:	Morice Land and Resource Management Plan: Goals.....	4-8
Table 4.2-1:	Relevant Information in the EAC Application and this Supplemental Report for Existing Indigenous Nation Land Use Plans.....	4-9

LIST OF FIGURES

Figure 4.2-1:	Widzin Kwah Water Sustainability Project Plan Boundary	4-11
Figure 4.2-2:	Land and Resource Use Regional Study Area Overlap with the Widzin Kwah Water Sustainability Project Plan	4-12

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ASX:BRL	Australian Stock Exchange: Bathurst Resources Limited
BC	British Columbia
BVCRB	Bulkley Valley Community Resources Boards
CAD	Canadian dollar
CEA	Cumulative Effects Assessment
EA	Environmental Assessment
EAA 2002	<i>Environmental Assessment Act, SBC 2002, c 43</i>
EAA 2018	<i>Environmental Assessment Act, SBC 2018, c 51</i>
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
GDP	gross domestic product
IRM	Integrated Resource Management
km	kilometres
LRMP	Land and Resource Management Plan
LSA	Local Study Area
LUP	Landscape Unit Plan
OCP	Official Community Plan
OW	Office of the Wet'Suwet'en
%	percent
Project	Tenas Metallurgical Coal Project
RAMP	Recreational Access Management Plan
RCP	Reclamation and Closure Plan
RDBN	Regional District of Bulkley-Nechako
RMZ	Resource Management Zone
RSA	Regional Study Area
SEMP	Socio-economic Management Plan
SRMP	Sustainable Resource Management Plan

Acronym/Abbreviation	Definition
TCL	Telkwa Coal Limited (the Proponent of the Tenas Project until January 2, 2024)
TML	Telkwa Mining Limited (the Proponent of the Tenas Project after January 2, 2024)
VC	Valued Component
VQO	Visual Quality Objective
WWSP	Widzin Kwah Water Sustainability Project

1. INTRODUCTION

Telkwa Mining Limited (TML), a wholly owned subsidiary of Bathurst Resources Limited, is proposing to develop the Tenas Metallurgical Coal Project (the Project), a surface coal mine located approximately 25 kilometres (km) south of the town of Smithers and 7 km southwest of the village of Telkwa in northwestern British Columbia (BC). The Project is located on provincial Crown Land, three freehold land parcels owned by TML, and nine coal licences held by TML and Bulkley Valley Collieries Ltd.

The Project is designed to produce approximately 16 million tonnes of washed metallurgical coal product to be used in the manufacturing of steel. The mine life of the Project will be approximately 25 years, including the Construction, Operation, and Decommissioning and Reclamation phases.

On November 6, 2018, Telkwa Coal Limited (TCL; now TML), entered the Project into the BC Environmental Assessment (EA) process under the BC *Environmental Assessment Act*, SBC 2002, c 43 (EAA 2002; Government of BC 2002). In May 2022, TCL submitted an Environmental Assessment Certificate (EAC) Application to the BC Environmental Assessment Office (EAO) under the EAA 2002.

On December 16, 2019, the *Environmental Assessment Act*, SBC 2018, c.51 (EAA 2018; Government of BC 2018) was brought into force. The EAA 2018 included a requirement under section 78(7) that a project with an EA underway under the EAA 2002 must complete the assessment within three years of the EAA 2018 being brought into force. If a project's EA is not completed within this designated timeframe, the Chief Executive Assessment Officer may make a Transition Order for a project to be transferred to the EAA 2018. On December 16, 2022, the EAO issued a Transition Order under section 78(7) of the EAA 2018 that transitioned the remaining portions of the Project's EA to the EAA 2018. The Transition Order does not require the Project's EA process to be restarted, but requires additional information to be provided, and describes the scope of the additional information.

In December 2023, Bathurst Resources Limited acquired the Project. Bathurst Resources Limited is a New Zealand based company listed on the Australian Stock Exchange (ASX: BRL), managing and operating four surface coal mines in New Zealand. In January 2024, the Project Proponent provided notice to the EAO that TML is replacing TCL as the Proponent for the Project. TML is a wholly owned subsidiary of Bathurst Resources Limited. The BC EAO has made the necessary name changes to move the EA process forward with TML as the Proponent.

This Supplemental Report specifically addresses items (1), (2), and (5) in Section C of Schedule A¹ of the Transition Order which require TML to provide:

C. Additional information to address Section 25(1) and Section 25(2) of the Act:

1. *Any positive effects to Indigenous interests or Indigenous nations that are anticipated as a result of the Project.*
2. *The positive and negative indirect effects of the Project, including:*
 - a. *Long-term trends (e.g., changing environment, cumulative impacts of development, employment, and technology) and market fluctuations.*
 - b. *Anticipated positive effects, any uncertainties related to those effects, how those effects will be monitored and, in the event those effects prove to be negative, in whole or in part, how the negative effects will be adaptively managed, mitigated, and in the case of impacts to Indigenous interests, accommodated.*
5. *A description of how the Project is consistent with any land-use plan of the government or an Indigenous nation.*

Section 2 of this Supplemental Report provides information on the assessment approach for identifying and assessing potential positive and negative indirect effects of the Project that were not previously assessed in the EAC Application, in response to Schedule A Section C (1), (2a), and (2b) of the Transition Order.

Section 3 of this Supplemental Report provides the effects assessments for Valued Components (VCs) that have new potential positive or negative indirect effects, in response to Schedule A Section C (1), (2a), and (2b) of the Transition Order.

Section 4 of this Supplemental Report describes how the Project is consistent with land use plans of the government or an Indigenous nation, in response to Schedule A Section C (5) of the Transition Order.

¹ Other requirements of the Transition Order are addressed in separate documents prepared by TML.

2. ASSESSMENT APPROACH

The Supplemental Report identifies whether potential positive or negative indirect effects of the Project are predicted that were not previously assessed for the VCs in the EAC Application. The objective of this Supplemental Report is to assess these new effects, in response to Schedule A Section C items (1), (2a), and (2b) of the Transition Order.

This report uses definitions provided by the BC EAO (2020) to guide the analysis. A positive effect is a result that is considered desirable or beneficial by participants in the EA, including Indigenous nations, government agencies, the Technical Advisory Committee, any Community Advisory Committee, the public, or the Proponent (BC EAO 2020). Indirect effects can result from a change that the Project may cause that is often one step removed (i.e., secondary) from the Project's activities due to complex relationships among components (BC EAO 2020).

2.1 METHODS

The potential for a new effect on each VC was evaluated in Section 2.2. Where no new potential effect is predicted, these VCs were not assessed further, and a rationale is provided. Where the potential for a new effect is predicted, a rationale is provided, and these VCs were carried forward for assessment in Section 3.

The identification and assessment of effects on each VC relies on the information provided in the EAC Application and is aligned with the recommended guidelines and legislated requirements pursuant to the EAA 2018.

The effects assessment of each VC in this Supplemental Report follows the methodology described in the EAC Application, including the defined spatial, temporal, administrative, and technical boundaries described for each VC. Where potential positive and negative effects are identified, enhancement and mitigation measures are identified. Criteria used to characterize residual and cumulative effects remain unchanged from the EAC Application and include: Direction, Magnitude, Geographic Extent, Duration, Frequency, Reversibility, and Context. The characterization criteria thresholds and ratings are considered when evaluating the significance of overall Project residual effects.

2.2 SCREENING FOR POTENTIAL EFFECTS

Table 2.2-1 identifies VCs with potential positive or negative indirect effects that were not previously assessed in the EAC Application, in response to Schedule A Section C (1), (2a), and (2b) of the Transition Order. Where a new potential effect is not predicted (○), no further assessment is warranted for the VC. A rationale for why a new potential effect is not predicted for these VCs is provided in Table 2.2-2.

Table 2.2-1: Summary of Screening for New Potential Effects by Valued Component

Valued Component	Schedule A Section C Items		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
Atmospheric Environment	○	○	○
Terrain and Soils	○	○	○
Surface Water	○	○	○
Groundwater	○	○	○
Aquatic Resources	○	○	○
Fish and Fish Habitat	○	○	○
Vegetation	○	○	○
Wildlife	○	○	○
Avian Species	○	○	○
Labour Market	●	○	○
Economic Development	●	○	○
Demographics	○	○	○
Visual Resources	○	○	○
Infrastructure and Services	○	○	●
Land and Resource Use	○	○	○
Community Well-being	○	○	○
Heritage Resources	○	○	○
Human Health	○	○	○
Wet'suwet'en Rights and Interests	○	○	○

Notes:

○ = a new potential effect is not predicted beyond what was assessed in the EAC Application; no further assessment is warranted.

● = a new potential effect is predicted beyond what was assessed in the EAC Application; further assessment is warranted.

Where a new potential effect beyond what was assessed in the EAC Application is predicted (●), further assessment is warranted for the VC. A rationale is provided in Table 2.2-2 and the effects assessment is conducted in Section 3.

Table 2.2-2: Screening Rationale by Valued Component

Valued Component	Screening Rationale		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
Atmospheric Environment	No positive effects on the Atmospheric Environment VC are anticipated. Long-term trends relevant to this VC were considered in the EAC Application (e.g., climate conditions data over the last 30 years). Long-term trends have already been accounted for in the effects assessment of the Atmospheric Environment VC and no new potential negative indirect effects are predicted. The potential developments and activities that can cumulatively interact with the Project and that were identified at the time of writing, are in the cumulative effects assessment in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Atmospheric Environment VC.		
Terrain and Soils	No positive effects on the Terrain and Soils VC are anticipated. Long-term trends relevant to this VC were considered in the EAC Application (e.g., changes in the environment through terrain stability, surface erosion potential, and natural hazards). Long-term trends have already been accounted for in the effects assessment of the Terrain and Soils VC and no new potential negative indirect effects are predicted. The potential developments and activities that can cumulatively interact with the Project and that were identified at the time of writing, are in the cumulative effects assessment in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Terrain and Soils VC.		
Surface Water	No positive effects on the Surface Water VC are anticipated. Long-term trends relevant to this VC were considered in the EAC Application (e.g., comparison of baseline monitoring completed between 1997 and 1999 with recent monitoring conducted between 2017 and 2020). Long-term trends have already been accounted for in the effects assessment of the Surface Water VC and no new potential negative indirect effects are predicted. The potential developments and activities that can cumulatively interact with the Project and that were identified at the time of writing, are in the cumulative effects assessment in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Surface Water VC.		

Valued Component	Screening Rationale		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
Groundwater	No positive effects on the Groundwater VC are anticipated. Long-term trends relevant to this VC were considered in the EAC Application (e.g., comparison of baseline monitoring completed between 1982 and 1997 with recent monitoring conducted between 2016 and 2019). Long-term trends have already been accounted for in the effects assessment of the Groundwater VC and no new potential negative indirect effects are predicted. The potential developments and activities that can cumulatively interact with the Project and that were identified at the time of writing, are in the cumulative effects assessment in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Groundwater VC.		
Aquatic Resources	No positive effects on the Aquatic Resources VC are anticipated. Long-term trends relevant to this VC were considered in the EAC Application (e.g., review of baseline data collected for Goathorn Creek, Tenas Creek, Telkwa River and the Bulkley River since 1983 compared with recent data collected between 2017 and 2020). Long-term trends have already been accounted for in the effects assessment of the Aquatic Resources VC and no new potential negative indirect effects are predicted. The potential developments and activities that can cumulatively interact with the Project and that were identified at the time of writing, are in the cumulative effects assessment in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Aquatic Resources VC.		
Fish and Fish Habitat	No positive effects on the Fish and Fish Habitat VC are anticipated. Long-term trends relevant to this VC were considered in the EAC Application (e.g., Wet'suwet'en Traditional Knowledge, and review of baseline data collected for Goathorn Creek, Tenas Creek, Telkwa River and the Bulkley River since 1982 compared with recent data collected between 2017 and 2020). Long-term trends have already been accounted for in the effects assessment of the Fish and Fish Habitat VC and no new potential negative indirect effects are predicted. The potential developments and activities that can cumulatively interact with the Project and that were identified at the time of writing, are in the cumulative effects assessment in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Fish and Fish Habitat VC.		

Valued Component	Screening Rationale		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
Vegetation	No positive effects on the Vegetation VC are anticipated. Long-term trends relevant to this VC were considered in the EAC Application (e.g., Wet'suwet'en Traditional Knowledge, and baseline data collected in 1984, 1997, 1999, and 2017 to 2019). Long-term trends have already been accounted for in the effects assessment of the Vegetation VC and no new potential negative indirect effects are predicted. The potential developments and activities that can cumulatively interact with the Project and that were identified at the time of writing, are in the cumulative effects assessment in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Vegetation VC.		
Wildlife	No positive effects on the Wildlife VC are anticipated. Long-term trends relevant to this VC were considered in the EAC Application (e.g., Wet'suwet'en Traditional Knowledge, changing habitat following mountain pine and spruce beetle outbreaks, changing habitat and population trends of the Telkwa Caribou Herd, ungulate radio collar data from 1994-2018, moose population survey data from 1992-2018, and trapper harvest data from 1975-2017). Long-term trends have already been accounted for in the effects assessment of the Wildlife VC and no new potential negative indirect effects are predicted. The potential developments and activities that can cumulatively interact with the Project and that were identified at the time of writing, are in the cumulative effects assessment in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Wildlife VC.		
Avian Species	No positive effects on the Avian Species VC are anticipated. Long-term trends relevant to this VC were considered in the EAC Application (e.g. Wet'suwet'en Traditional Knowledge, and baseline data collected in 1984, 1990, 1998, and 2017 to 2019). Long-term trends have already been accounted for in the effects assessment of the Avian Species VC and no new potential negative indirect effects are predicted. The potential developments and activities that can cumulatively interact with the Project and that were identified at the time of writing, are in the cumulative effects assessment in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Avian Species VC.		

Valued Component	Screening Rationale		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
Labour Market	Positive effects of the Project on Indigenous nations can include direct employment opportunities, indirect employment opportunities with Project suppliers (with these impacts spanning the entire supply chain), or induced employment opportunities (i.e., those resulting from direct and indirect workers spending their income in industries such as retail, transportation, real estate, and entertainment). This increase in direct, indirect, and induced employment opportunities can lead to an increase in personal income. It can also lead to an increase in skill levels for workers through upskilling to qualify for jobs, on-the-job training, and work-related experience. The EAC Application considers and quantifies these broad employment and income benefits for workers, without investigating this benefit specifically to Indigenous employees. In consideration of the above, a new potential positive effect from the increase in employment, income, and skill level for Indigenous employees is predicted; further assessment is	The EAC Application considers the market fluctuations relevant to the Labour Market VC. For instance, the increased reliance on employment in the mining sector and with suppliers/contractors to the mining sector, which could have both positive and negative effects. While the provision and access to jobs is a positive effect, the slow down or closure of mining activities can have more notable impacts on unemployment and income levels in the LSA and RSA. As such, the EAC Application assessed an increased reliance on/decreased diversity in the mining sector and the effect on jobs. No additional trends related to market fluctuations are identified. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Labour Market VC with respect to item C (2a).	A positive effect of the Project could result from the distribution of indirect regional, provincial, and national employment opportunities. The EAC Application estimates how the benefits will be distributed in the RDBN, BC, and Canada based on results from the economic modelling (Input-Output Model); however, the distribution of such benefits, or positive indirect effects, cannot be predicted with certainty. Another positive effect of the Project is the increased employment opportunities, which includes inherent uncertainty in the distribution of employment benefits (direct, indirect, and induced) and in the income opportunities for residents in the LSA and RSA, including the consideration of different population subgroups, such as Indigenous people. This uncertainty was discussed in the EAC Application with regards to

Valued Component	Screening Rationale		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
	warranted for the Labour Market VC with respect to item C (1).		the existing and potential barriers for Indigenous people to benefit from potential employment opportunities. Enhancement and mitigation measures for this effect are provided in the EAC Application. Furthermore, the SEMP developed for the EAC Application includes monitoring of positive and negative effects to confirm the actual effects and effectiveness of the monitoring measures on the socio-economic environment, as well as to identify any other effects that result from the Project but were not predicted. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Labour Market VC with respect to item C (2b).
Economic Development	Positive effects on Indigenous nations can include direct Project contract opportunities awarded to Indigenous businesses, indirect contract	The EAC Application considers the market fluctuations relevant to the Economic Development VC. For instance, the potential positive effects	A positive effect of the Project could result from the distribution of indirect regional, provincial, and national benefits related to GDP,

Valued Component	Screening Rationale		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
	opportunities with Project suppliers (with these impacts spanning the entire supply chain), or induced contract opportunities (i.e., those resulting from direct and indirect workers spending their income in industries such as retail, transportation, real estate, and entertainment). This increase in direct, indirect, and induced business opportunities can lead to higher revenue for Indigenous businesses if such contracts are awarded, further leading to growing business capacity of Indigenous businesses. The EAC Application considers this broad effect on local and regional businesses, without investigating this benefit specifically to Indigenous businesses. In consideration of the above, a new potential positive effect of the increase in business opportunities for Indigenous businesses is predicted; further assessment is warranted for the Economic Development VC with respect to item C (1).	on economic growth through contributions to (GDP, and on government revenue that can support the provision of public services and infrastructure, are identified and described for the duration of the Project in the EAC Application. Furthermore, as discussed for the Labour Market VC, the EAC Application assessed market fluctuations through an increased reliance on/decreased diversity in the mining sector and the effect on jobs. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Economic Development VC with respect to item C (2a).	tax revenue, and business revenue. While the EAC Application provides an approximation on the size of this positive effect and how these benefits will be distributed in the RDBN, BC, and Canada, the distribution of such benefits cannot be predicted with certainty. Enhancement and mitigation measures for this effect are provided in the EAC Application. Furthermore, the SEMP includes monitoring of positive and negative effects to confirm the actual effects and effectiveness of the monitoring measures on the socio-economic environment, as well as to identify any other effects that result from the Project but were not predicted. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Economic Development VC with respect to item C (2b).

Valued Component	Screening Rationale		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
Demographics	Although the assessment of the Demographics VC in the EAC Application acknowledges that interactions with the Project may be positive or negative, only adverse effects were assessed, and no positive effects on Indigenous nations were identified. There is no additional information to inform a potential new positive effect on Indigenous nations or other indirect positive or negative effects. The Project's proposed efforts to mitigate changes in population during the Construction and Operation phases may indirectly minimize related impacts on Indigenous nations, but again, no additional information has been identified to confirm this. In consideration of the Project's efforts to reduce and mitigate changes in population and related demographic factors, these activities may also contribute indirectly to minimizing impacts on Indigenous nations. Specifically, this minimization could be related to current and future use of land and resources for traditional purposes during the Construction and Operations phases of the Project. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Demographics VC.		
Visual Resources	Mining and other resource development activities (e.g., forestry, quarrying) that take place in undisturbed landscapes are inherently considered visual disturbances, and thus have a potentially negative effect on the Visual Resources VC. A positive effect could only occur where there is existing long-term visual disturbance (i.e., persists for a length of time comparable to the life of the Project), such as an existing mine, which could be restored to a more natural appearance. As the Project is to be constructed in a forested landscape with no pre-existing long-term visual disturbances, no positive effect to the Visual Resources VC is anticipated. Additionally, only the visual condition of the landscape as seen from locations with a direct line-of sight is used for the assessment of the Visual Resources VC; thus, the only possible effect is a change in that visual condition due to Project activities (i.e., a direct effect). In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Visual Resources VC.		

Valued Component	Screening Rationale		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
Infrastructure and Services	The assessment of the Infrastructure and Services VC in the EAC Application did not identify positive effects on Indigenous nations and no additional information was identified potential for a positive effect. While proposed mitigation in the EAC Application includes a commitment to fund at least one full-time position at an approved childcare facility run by an Indigenous group in the region (selected by TML via an application process), this measure is not considered a positive effect because it is intended to mitigate negative impacts associated with the increased demand for childcare services and restore baseline conditions. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Infrastructure and Services VC with respect to item C (1).	The EAC Application considers the market fluctuations relevant to the Infrastructure and Services VC. For instance, the potential positive effects on government revenue through corporate and personal income tax, sales tax, property tax, and mining tax payments, which can support the provision of infrastructure and services, are identified, and described for the duration of the Project in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Infrastructure and Services VC with respect to item C (2a).	Increase in the government tax base and GDP benefit will support local government to meet the change in demand of community infrastructure and services that could occur because of the Project, leading to long-term improvements to community infrastructure and services. Although there is uncertainty associated with the distribution of benefits-related tax revenue and the allocation of funds or resources towards infrastructure and services in the LSA or RSA, the Project has the potential to improve community infrastructure and services. In consideration of the above, a new potential positive effect of improved community infrastructure and services is predicted; further assessment is warranted for the Infrastructure and Services VC with respect to item C (2b).

Valued Component	Screening Rationale		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
Land and Resource Use	The EAC Application considers the benefits to recreational land users (both Indigenous and non-Indigenous) due to access improvements west of the Project Area, as well as replacement of an escorted access over the Goathorn Creek Bridge. However, this improved access could also indirectly affect (positively or negatively) Indigenous recreational or traditional land and resource users in unexpected ways, and there is no additional information available for the Project to indicate new or different indirect effects (e.g., potential positive effects) from those already assessed in the EAC Application. The EAC Application considers the approved activities within various zones identified in community and regional land use plans that could causes changes in the landscape (e.g., forestry tenure activities). The potential developments and management zones that can cumulatively interact with the Project are included in the EAC Application. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Land and Resource Use VC.		
Community Well-being	The EAC Application addresses positive and negative indirect effects and notes that there is general uncertainty for all effects on community well-being (positive or negative). This uncertainty is due to lack of quantitative data for the LSA and RSA, the complex and subjective nature of well-being, and the increased potential for confounding factors for indirect effects (which make up most effects in the Community Well-being VC) compared to direct effects. The EAC Application describes mitigation measures for the potential negative effects and acknowledges how mitigation may also contribute to positive effects. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Community Well-being VC.		
Heritage Resources	Mining and other resource development activities (e.g., forestry, quarrying) that result in impacts to the ground surface or vegetation are inherently considered to have the potential to wholly or partially disturb Heritage Resources that may be present, and thus have a potentially negative effect on the Heritage Resources VC. Any potential positive effect through the gathering of additional information about the sites through further study are offset by these disturbances. Additionally, the assessment of the Heritage Resources VC considers only the potential for disturbance of the physical resource and thus the only possible effect is a direct effect due to Project activities. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Heritage Resources VC.		

Valued Component	Screening Rationale		
	C (1): Positive Effects to Indigenous Interests or Indigenous Nations	C (2a): Long-term Trends and Market Fluctuations	C (2b): Positive Effects and Uncertainties
Human Health	No changes to the Human Health Risk Assessment conclusions or the Atmospheric Environment VC have been made following the initial assessment of the Human Health VC, and therefore, no additional positive or negative indirect effects are identified beyond those presented in the EAC Application. Similarly, given that there is no additional information presented regarding positive effects related to the Human Health Risk Assessment or Atmospheric Environment VC, no positive effects Indigenous nations are identified in this Supplemental Report. In consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Human Health VC.		
Wet'suwet'en Rights and Interests	No new potential positive effects are predicted for Wet'suwet'en Rights and Interests beyond those already discussed in the EAC Application. However, new potential positive effects for Indigenous nations have been identified for other VCs (e.g., Labour Market, Economic Development) and are carried forward for further assessment. The EAC Application considers the extent to which long-term trends have affected Wet'suwet'en Rights and Interests through past and present environmental and socio-economic processes and conditions. Furthermore, in-depth involvement of Wet'suwet'en Traditional Knowledge has been implemented in the Project design, VC effects assessments, and mitigation measures. In consideration of the above, new potential effects are not predicted; further assessment is not warranted.		

Notes: BC = British Columbia; EAC = Environmental Assessment Certificate; GDP = gross domestic product; LSA = Local Study Area; RDBN = Regional District of Bulkley-Nechako; RSA = Regional Study Area; SEMP = Socio-economic Management Plan; TML = Telkwa Mining Limited; VC = Valued Component.

3. EFFECTS ASSESSMENT

3.1 LABOUR MARKET

TML welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (Wet'suwet'en Wellbeing Study (WWS), Rights Impact Assessment (RIA), Cultural Use Study (CUS)) into Tenas Project planning. TML notes that comments OW-001, OW-004, OW-176 and OW-179 are related to local employment effects, including information discussed in this section of the *Environmental Assessment Transition Order Supplemental Report*.

As described in Table 2.2-2, one new potential positive effect is predicted in response to Transition Order Schedule A Section C item (1):

- Increase in employment, income, and skill level for Indigenous employees.

The project and cumulative effects assessments in the subsequent sections follow the methodology outlined in the Labour Market VC Chapter of the EAC Application (Section 5.0, Chapter 1 of the EAC Application).

3.1.1 Assessment of Project Effects

3.1.1.1 Potential Effects

The EAC Application predicts up to 295.8 direct, 230.1 indirect, and 129.8 induced jobs (full-time equivalent) during the Construction phase of the Project (Section 5.0, Chapter 1, Table 5.2-1 in the EAC Application), and up to 165.9 direct, 135.8 indirect, and 53.9 induced jobs during the Operation phase of the Project (Section 5.0, Chapter 1, Table 5.2-3 in the EAC Application). While the EAC Application makes predictions regarding the local, regional, and provincial employment, the number of Indigenous employees to benefit from employment and income opportunities is uncertain. However, Statistics Canada estimates that in 2020, workers of Indigenous identity held approximately 6.2 percent (%) of construction jobs in BC and 11.6% of all jobs in mining, quarrying, and oil and gas extraction (Statistics Canada 2023). The average percentage of Indigenous employees in BC for all industries is 5.0% (Statistics Canada 2023). In consideration of the above, and for the purpose of this assessment, these Statistics Canada estimates for Indigenous employment are applied to relevant job categories for the Project. As such, it is estimated that the Project could hire approximately 20 Indigenous employees in Construction and 20 Indigenous employees in Operation, with another 34 Indigenous employees hired in other indirect and induced industries in the LSA, RSA, or BC.

It should be noted that TML is specifically targeting employment opportunities for individuals from the Wet'suwet'en First Nation, which has an estimated labour force of around 100 people. Of this group, approximately 15% of this workforce, or about 15 individuals, are expected to be employed with the Project, representing a material proportion of predicted employment for the Wet'suwet'en First Nation².

Depending on the type of jobs to be potentially held by Indigenous employees at the Project, or in indirect or induced industries, employment opportunities can have a positive effect on personal income. Potential average wages for direct, indirect, and induced employment during the Construction phase are provided in Section 5.0, Chapter 1, Table 5.2-1 of the EAC Application; while the estimated effect on wages and salaries for the Operation phase is summarized in Section 5.0, Chapter 1, Table 5.2-4 of the EAC Application. The Project's employment opportunities have the potential to increase the skills of some workers through upskilling to qualify for jobs, on-the-job training, and work-related experience. As such, the effect of an increase in employment, income, and skill level for Indigenous employees is considered a positive effect during Project Construction and Operation phases.

3.1.1.2 Mitigation Measures

Enhancement measures for the potential positive effect of an increase in employment, income, and skill level for Indigenous employees are described in Section 5.0, Chapter 1, Sections 5.3.3, 5.3.7, 5.3.8, 5.3.9, and 5.3.10 of the EAC Application. While no additional enhancement measures were identified for this positive effect, it is important to note that TML is actively targeting employment opportunities for members of the Wet'suwet'en First Nation.

3.1.1.3 Residual Effects and Significance

After implementing the proposed enhancement measures and given the contribution of 20 direct jobs during the Construction and Operation phases and an estimated 34 indirect and induced jobs, a residual positive effect is predicted for the increase in employment, income, and skill level of Indigenous employees.

Table 3.1-1 in this Supplemental Report provides characterization of the residual effect and the rationale for each rating according to the definitions provided in Section 5.0, Chapter 1, Table 5.4-1 in the EAC Application.

² Wet'suwet'en First Nation has a population of 252 members living off and on reserve (CIRNAC 2024). The 2021 Census of Population provides information on the Palling 1, Indian reserve of the Wet'suwet'en First Nation. Informing that of the 92 residents in Palling, 60 (65.2%) were over the age of 15, and 35 participated in the labour force (with a participation rate of 58.3%). The unemployment rate for this community was 0% in 2021. By approximation, it is estimated that 65.2% (or 164) of the 252 Wet'suwet'en individuals are 15 years of age and over, and of that, 58.3% or 96 individuals participate in the labour force. The Regional District of Bulkley Nechako had 7,410 Indigenous people in 2021, comprising 20% of the RDBN population.

Table 3.1-1: Summary of Residual Effect Characterization for an Increase in Employment, Income, and Skill Level for Indigenous Employees

Residual Effect Characteristic	Rating	Rationale for Rating
Direction	Positive	The provision of jobs to Indigenous people, and the resulting increases in personal income, and skill levels, is a beneficial / positive effect of the Project.
Magnitude	Low	An estimated 20 direct and 34 indirect and induced jobs could be created for Indigenous people.
Geographic Extent	Beyond RSA	Indigenous employees could be hired from the LSA, RSA and beyond RSA.
Duration	Long-term	The effect is predicted for the Construction phase (1.5 years) and Operation phase (21 years) of the Project.
Frequency	Continuous	This effect will commence at the time of hiring and extend over the duration of employment.
Reversibility	Partly Reversible	The effect is partially reversible, as employment opportunities will end once the Project concludes operations; however, the positive impact on Indigenous skills development and capacity-building will have lasting benefits beyond the Project's lifecycle.
Context	Moderate	The labour market for Indigenous employees demonstrates moderate resilience, with potential to increase employment, income, and skill levels. Indigenous employees may be able to adapt to and benefit from these opportunities, strengthening their position in the workforce. However, when the Project concludes operations, these employment opportunities will diminish, which may require workers to seek alternative roles to maintain income and continue building their skills.

Notes: LSA = Local Study Area; RDBN = Regional District of Bulkley-Nechako; RSA = Regional Study Area.

Direction = Whether the direction of the predicted effect is expected to be positive or adverse.

Magnitude = Severity of the residual effect measured in terms of the proportion of the Labour Market affected, relative to the range of natural or historic variation. **Low:** differs from the baseline conditions but remains within the range of natural variation. **Moderate:** differs substantially from baseline conditions and approaches the limits of natural variation. **High:** differs substantially from baseline conditions resulting in a detectable change beyond the range of natural variation.

Geographic Extent = Spatial scale over which the residual effect is expected to occur. **LSA:** effect is limited to the LSA communities. **RDBN A and RDBN G:** effect takes place in the Electoral Areas. **RSA (RDBN plus Witset):** effect occurs in the RDBN and the community of Witset. **Beyond RSA:** effect occurs in the RSA, in the province and the rest of Canada.

Duration = Length of time over which the residual effect is expected to persist. **Short-term:** less than 2 years. **Medium-term:** 2 to 5 years. **Long-term:** over 5 years.

Frequency = How often the residual effect is expected to occur. **Infrequent**: effect occurs rarely and at sporadic intervals. **Frequent**: effect occurs on a regular/frequent basis. **Continuous**: effect occurs constantly.

Reversibility = Whether or not the residual effect can be reversed once the activity causing the residual effect ceases. Irreversible effects are considered to be permanent. **Fully Reversible**: effect can be reversed. **Partially Reversible**: effect can be partially reversed. **Irreversible**: effect cannot be reversed.

Context = The extent to which the Labour Market VC has been affected by past and present socio-economic processes and conditions, its potential sensitivity to the Project-related residual effect, and its ability to recover from that effect (i.e., resilience). **Low**: the receiving environment or population has a high natural resilience to imposed stresses and can respond and adapt to the effect. **Moderate**: the receiving environment or population has a neutral resilience to imposed stresses and may be able to respond and adapt to the effect. **High**: the receiving environment or population has a low resilience to imposed stresses and will not easily adapt to the effect.

The Project's employment of Indigenous people can provide significant benefits by raising income levels for these workers while fostering skill development and capacity-building within Indigenous communities. Through targeted training and career advancement opportunities, the Project not only enhances individual economic outcomes but also strengthens the community's long-term workforce potential.

The Likelihood of the residual effect occurring is rated Likely, as the implemented enhancement measures have the potential to increase this residual positive effect. The residual effect of an increase in employment, income, and skill level for Indigenous employees is rated as Not Significant³. The Level of Confidence in these predictions is Moderate, as the Project has made commitments to Indigenous employment; however, it remains challenging to predict the number of Indigenous employees who will be interested in these opportunities, possess the necessary skills, or be interested in upskilling, and apply for employment.

3.1.2 Assessment of Cumulative Effects

3.1.2.1 Potential Cumulative Effects

The Project-related effect of on increase in employment, income, and skill level for Indigenous employees during the Construction and Operation phases was carried forward to the Cumulative Effects Assessment (CEA). The assessment is based on consideration of identified residual effect characteristics; the socio-economic context for the Labour Market VC described in the EAC Application (Section 5.0, Chapter 1, Section 5.1), and the list of past, present, and reasonably foreseeable future projects and activities that may cumulatively interact with the Project and contribute to this beneficial effect (Section 5.0, Chapter 1, Table 6-1 in the EAC Application).

³ Significant residual effects occur when the residual effect is of High Magnitude, Provincial Extent, Long-term Duration, with Frequent or Continuous Occurrence, Irreversible, and of Low Context. Effects are characterized as Significant if they are likely to cause structural and functional changes in the Labour Market VC. Residual effects are Not Significant when any condition of Significant described above is not met.

3.1.2.2 Additional Mitigation Measures

Section 5.0, Chapter 1, Section 5.3 in the EAC Application describes enhancement, and mitigation measures applicable to potential Project effects on the Labour Market VC. It is expected that other present and potential reasonably foreseeable future projects and activities would have similar mitigation measures in place to those listed in Section 3.1.1.2 of this Supplemental Report, to cumulatively reduce or remove the potential cumulative effects of the Project. As such, additional enhancement, and mitigation measures for the increase in employment, income, and skill level for Indigenous employees are not identified.

3.1.2.3 Residual Cumulative Effects and Significance

The Project's residual effect of an increase in employment, income, and skill level for Indigenous employees during the Construction and Operation phases may overlap with the effects of the present and reasonably foreseeable future projects given that other projects and activities will also provide employment and income opportunities.

Table 3.1-2 in this Supplemental Report provides characterization of the residual cumulative effect of the increase in employment, income, and skill level for Indigenous employees of the Project in combination with those of other projects and activities, along with the rationale for each rating.

Table 3.1-2: Summary of Residual Cumulative Effect Characterization for an Increase in Employment, Income, and Skill Level for Indigenous Employees

Residual Effect Characteristic	Rating	Rationale for Rating
Direction	Positive	The provision of jobs to Indigenous people, and the resulting increases in personal income, and skill levels, is a beneficial / positive effect of the Project.
Magnitude	Moderate	This positive effect may overlap with the effects of the present and reasonably foreseeable future projects given that other projects and activities will also provide employment and income opportunities. The cumulative contribution to Indigenous employment, personal income, and skill building, has the potential to increase the magnitude of this positive effect.
Geographic Extent	Beyond RSA	The extent is beyond RSA because projects and activities from the RDBN and the rest of the province are expected to draw workers from various communities, increasing the employment of Indigenous people.

Residual Effect Characteristic	Rating	Rationale for Rating
Duration	Long-term	The effect is predicted for the Construction phase (1.5 years) and Operation phase (21 years) of the Project.
Frequency	Continuous	This effect will commence at the time of hiring and extend over the duration of employment.
Reversibility	Partly Reversible	The effect is partially reversible, because when the Project concludes and employment opportunities end, the positive impact on Indigenous skills and capacity will provide lasting benefits.
Context	Moderate	Context is predicted to be moderate given the opportunity to benefit from Project opportunities through focus on training and skill building.

Notes: RDBN = Regional District of Bulkley-Nechako; RSA = Regional Study Area.

Direction = Whether the direction of the predicted effect is expected to be positive or adverse.

Magnitude = Severity of the residual effect measured in terms of the proportion of the Labour Market affected, relative to the range of natural or historic variation. **Low:** differs from the baseline conditions but remains within the range of natural variation. **Moderate:** differs substantially from baseline conditions and approaches the limits of natural variation. **High:** differs substantially from baseline conditions resulting in a detectable change beyond the range of natural variation.

Geographic Extent = Spatial scale over which the residual effect is expected to occur. **LSA:** effect is limited to the LSA communities. **RDBN A and RDBN G:** effect takes place in the Electoral Areas. **RSA (RDBN plus Witset):** effect occurs in the RDBN and the community of Witset. **Beyond RSA:** effect occurs in the RSA, in the province and the rest of Canada.

Duration = Length of time over which the residual effect is expected to persist. **Short-term:** less than 2 years. **Medium-term:** 2 to 5 years. **Long-term:** over 5 years.

Frequency = How often the residual effect is expected to occur. **Infrequent:** effect occurs rarely and at sporadic intervals. **Frequent:** effect occurs on a regular/frequent basis. **Continuous:** effect occurs constantly.

Reversibility = Whether or not the residual effect can be reversed once the activity causing the residual effect ceases. Irreversible effects are considered to be permanent. **Fully Reversible:** effect can be reversed. **Partially Reversible:** effect can be partially reversed. **Irreversible:** effect cannot be reversed.

Context = The extent to which the Labour Market VC has been affected by past and present socio-economic processes and conditions, its potential sensitivity to the Project-related residual effect, and its ability to recover from that effect (i.e., resilience). **Low:** the receiving environment or population has a high natural resilience to imposed stresses and can respond and adapt to the effect. **Moderate:** the receiving environment or population has a neutral resilience to imposed stresses and may be able to respond and adapt to the effect. **High:** the receiving environment or population has a low resilience to imposed stresses and will not easily adapt to the effect.

The Likelihood of the residual cumulative effect occurring is rated Likely, and the significance determination is predicted to be Not Significant. Confidence in the assessment is Moderate due to uncertainties and lack of information around the number of reasonably foreseeable future projects that will be realized, and their specific scope and timing.

3.2 ECONOMIC DEVELOPMENT

TML welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. TML notes that comments OW-001 and OW-004 are related to local economic development effects, including information discussed in this section of the *Environmental Assessment Transition Order Supplemental Report*.

As described in Table 2.2-2, one new potential positive effect is predicted in response to Transition Order Schedule A Section C item (1):

- Increase in business opportunities / contracts to Indigenous businesses.

The Project and CEA in the subsequent sections follow the methodology outlined in the Economic Development VC Chapter of the EAC Application (Section 5.0, Chapter 2 of the EAC Application).

3.2.1 Assessment of Project Effects

3.2.1.1 Potential Effects

Section 5.0, Chapter 2, Section 5.2. in the EAC Application estimates the total spend during Project Construction to be \$119.7 million Canadian dollars (CAD)⁴, including:

- \$107.3 million (CAD) spent on equipment and parts (this does not include labour effort); and
- \$12.4 million (CAD) spent on contractors (including labour cost).

Section 5.0, Chapter 2, Table 5.2-1 in the EAC Application provides additional details on those expenditures.

Additionally, during Operation, the Project is anticipated to spend an estimated \$876.5 million (CAD)⁵, including:

- \$280.3 million (CAD) on equipment and parts;
- \$558.1 million (CAD) on consumables; and
- \$38.2 million (CAD) on contractors.

⁴ This does not include wage and salaries for TML employees.

⁵ This does not include wage and salaries for TML employees.

Section 5.0, Chapter 2, Table 5.2-4 in the EAC Application provides additional details on those expenditures.

The contracts described above will benefit businesses in the Regional District of Bulkley-Nechako (RDBN), BC, and Canada. Indigenous-owned businesses involved in mining projects often work as subcontractors providing camp, security, construction, drilling, blasting, tracking and transportation, and environmental and consultation services; as such, Indigenous-owned businesses are more likely to participate in areas other than the supply of equipment, parts, or consumables. As such, the analysis below considers the expected spend on subcontractors of \$12.4 million (CAD) during the 1.5-year Construction phase, and \$38.2 million (CAD) spent during the 21-year Operation phase, and that a portion of that spend (or total spend) would be awarded in contract to Indigenous businesses.

The EAC Application does not make any specific predictions or commitments regarding the total spend that could benefit Indigenous businesses. However, TML has recently set a target for 5% of procurement opportunities to Indigenous-owned companies or companies that employ at least 5% Indigenous people. Through applying the 5% procurement approach to subcontractor spend, Project contracts could amount to approximately \$1 million (CAD) during the Construction phase and \$2 million (CAD) throughout the Operation phase. Through applying the 5% procurement approach to the total spend during Project Construction or Operation, the contract could amount to \$6 million (CAD) during the Construction phase or \$45 million (CAD) throughout the Operation phase (approx. \$2 million (CAD) per year). Although it is challenging to accurately estimate the potential economic benefit to Indigenous-owned businesses from direct, indirect, and induced Project opportunities, it is expected that some Indigenous businesses will qualify for Project contracts during the Construction or Operation phases, or benefit from Project economic spin-off opportunities. As such, a positive effect of an increase in business opportunities / contracts to Indigenous businesses is predicted for the Construction or Operation phases of the Project.

3.2.1.2 Mitigation Measures

The EAC Application proposed a Procurement Program “to support procurement from local and regional businesses, and to reduce the barriers to entry for contracting opportunities for local and regional businesses, to maximize economic benefits to those businesses” (Section 5.0, Chapter 2, Section 5.3.8 of the EAC Application). This Procurement Program includes measures to improve procurement from smaller business with limited capacity, including Indigenous-owned businesses. Additional measures that were not proposed in the EAC Application could include the following to enhance the participation of Indigenous businesses in Project benefits:

- Engaging with Indigenous businesses to understand how to enable their successful participation in procurement processes.

- Conducting virtual business information sessions with Indigenous businesses to discuss Project bidding processes and business opportunities to increase participation on Indigenous businesses and successful bidding for Project opportunities.

Generally, it is understood that while the Project can implement measures that improve procurement from Indigenous businesses, the success of these measures is also linked to the ability of Indigenous businesses to meet bidding requirements and submit offers that qualify for Project opportunities. However, it should be noted that the efforts by TML may be complemented by actions from BC, which is committed to fostering reconciliation and supporting Indigenous economic development through partnerships with First Nations and community organizations. Initiatives like the Canadian Indigenous Business Accelerator and the First Nations Centre of Excellence for Economic Development aim to support Indigenous businesses, helping them access new markets and resources, and expand through export opportunities. These efforts are part of the Province's broader strategy to strengthen Indigenous economies and create lasting, collaborative partnerships. These initiatives also have the potential to enhance Indigenous business capacity, enabling them to successfully compete for procurement opportunities associated with the Project (Government of BC 2024a). TML's commitment to allocating 5% of Project expenditures in contracts to Indigenous-owned companies or companies that employ at least 5% Indigenous people is further poised to enhance the economic impact for these businesses. By ensuring that a portion of contracts goes to Indigenous enterprises, the initiative will create direct opportunities for increased participation in the Project and foster long-term economic benefits for Indigenous communities involved in procurement and related activities. This approach highlights TML's intent to build meaningful partnerships with Indigenous stakeholders and contribute to sustainable economic growth in these communities.

3.2.1.3 Residual Effects and Significance

Given the predicted limited impact of the Project on Indigenous business revenue, and in consideration of the implemented enhancement measures, a residual positive effect is predicted for the increase in business opportunities / contracts to Indigenous businesses during the Construction or Operation phases of the Project.

Table 3.2-1 in this Supplemental Report provides characterization of the residual effect and the rationale for each rating according to definitions in Section 5.0, Chapter 2, Table 5.4-1 of the EAC Application.

Table 3.2-1: Summary of Residual Effect Characterization for an Increase in Business Opportunities / Contracts to Indigenous Businesses

Residual Effect Characteristic	Rating	Rationale for Rating
Direction	Positive	The provision of contracts to Indigenous businesses is a beneficial / positive effect of the Project.
Magnitude	Low	The Project benefits to Indigenous businesses are estimated at \$6 million (CAD) in contracts during the Construction phase or \$45 million (CAD) in contracts awarded throughout the Operation phase (approx. \$2 million (CAD) per year).
Geographic Extent	Beyond RSA	While focus is not LSA and RSA procurement, Indigenous businesses from the LSA, RSA and beyond could benefit from Project procurement opportunities.
Duration	Long-term	The effect is predicted for the Construction phase (1.5 years) and Operation phase (21 years) of the Project.
Frequency	Frequent	This effect will take place as contracts are awarded on as needed basis.
Reversibility	Partly Reversible	The effect is partially reversible, as most procurement opportunities will end once the Project concludes operations; however, the positive impact on Indigenous businesses and capacity-building will have lasting benefits beyond the Project's lifecycle.
Context	Moderate	The economic development context shows moderate resilience, as Indigenous businesses may adapt to and benefit from increased procurement opportunities. Furthermore, these businesses may leverage skills and relationships developed through the Project to pursue new opportunities once the Project concludes.

Notes: CAD = Canadian dollar; LSA = Local Study Area; RDBN = Regional District of Bulkley-Nechako; RSA = Regional Study Area.

Direction = Whether the direction of the predicted effect is expected to be positive or adverse.

Magnitude = Size or severity of the residual effect measured in terms of the proportion of the VC affected within the LSA, relative to the range of natural variation or historic variation. **Low:** differs from the baseline conditions but remains within the range of natural variation. **Moderate:** differs substantially from baseline conditions and approaches the limits of natural variation. **High:** differs substantially from baseline conditions resulting in a detectable change beyond the range of natural variation.

Geographic Extent = Spatial scale over which the Economic Development VC residual effect is expected to occur. **LSA:** effect is limited to the LSA communities. **RDBN A and RDBN G:** effect takes place in the Electoral Areas. **RSA (RDBN plus Witset):** effect occurs in the RDBN and the community of Witset. **Beyond RSA:** effect occurs in the RSA, in the province and the rest of Canada.

Duration = Length of time over which the Economic Development VC residual effect is expected to persist. **Short-term:** less than 2 years. **Medium-term:** 2 to 5 years. **Long-term:** over 5 years.

Frequency = How often the Economic Development VC residual effect is expected to occur. **Infrequent:** effect occurs rarely and at sporadic intervals. **Frequent:** effect occurs on a regular/frequent basis. **Continuous:** effect occurs constantly.

Reversibility = Whether or not the Economic Development VC residual effect can be reversed once the activity causing the residual effect ceases. Irreversible effects are considered to be permanent. **Fully Reversible:** effect can be reversed. **Partially Reversible:** effect can be partially reversed. **Irreversible:** effect cannot be reversed.

Context = The extent to which Economic Development VC has been affected by past and present socio-economic processes and conditions, its potential sensitivity to the Project-related residual effect, and its ability to recover from that effect (i.e., resilience). **Low:** the receiving environment or population has a high natural resilience to imposed stresses and can respond and adapt to the effect. **Moderate:** the receiving environment or population has a neutral resilience to imposed stresses and may be able to respond and adapt to the effect. **High:** the receiving environment or population has a low resilience to imposed stresses and will not easily adapt to the effect.

The Project's focus on Indigenous procurement and contracts for goods and services can generate notable economic benefits and support business growth within Indigenous communities. By supporting partnerships with Indigenous-owned businesses and encouraging local procurement, the Project not only contributes to economic development, but also strengthens long-term capacity and business resilience.

The Likelihood of the residual effect is Likely, as the implemented enhancement measures have the potential to increase this residual positive effect. The residual effect of an increase in business opportunities / contracts to Indigenous businesses is rated as Not Significant⁶. The Level of Confidence in these predictions is Moderate, as the Project has made commitments to Indigenous procurement; however, it remains challenging to predict the number of Indigenous businesses that will pursue these opportunities, have the required capacities, or be interested in scaling to meet Project needs.

3.2.2 Assessment of Cumulative Effects

3.2.2.1 Potential Cumulative Effects

The Project-related effect of an increase in business opportunities / contracts to Indigenous businesses during the Construction and Operation phases was carried forward to the CEA. The assessment is based on consideration of identified residual effect characteristics; the socio-economic context for the Economic Development VC described in the EAC Application (Section 5.0, Chapter 2, Section 5.2); and the list of past, present, and reasonably foreseeable

⁶ Significant residual effects occur when the residual effect is of High Magnitude, Provincial Extent, Long-term Duration, with Frequent or Continuous Occurrence, Irreversible, and of Low Context. Effects are characterized as Significant if they are likely to cause structural and functional changes in the Economic Development VC. Residual effects are Not Significant when any condition of Significant described above is not met.

future projects and activities that may cumulatively interact with the Project and contribute to this beneficial effect (Section 5.0, Chapter 2, Table 6-1 of the EAC Application).

3.2.2.2 Additional Mitigation Measures

Section 5.0, Chapter 2, Section 5.3 of in the EAC Application describes enhancement and mitigation measures applicable to potential Project effects on the Economic Development VC. It is expected that other present and potential reasonably foreseeable future projects and activities would have similar mitigation measures in place to those listed in Section 3.2.1.2 of this Supplemental Report, to cumulatively reduce or remove the potential cumulative effects of the Project. As such, additional enhancement, and mitigation measures for the increase in business opportunities / contracts to Indigenous businesses during the Construction and Operation phases are not identified.

3.2.2.3 Residual Cumulative Effects and Significance

The Project's residual effect of an increase in business opportunities / contracts to Indigenous businesses during the Construction and Operation phases may overlap with the effects of the present and reasonably foreseeable future projects given that other projects and activities will make business opportunities available to Indigenous businesses.

Table 3.2-2 in this Supplemental Report provides characterization of the residual cumulative effect of the increase in business opportunities / contracts to Indigenous businesses during the Construction and Operation phases of the Project in combination with those of other projects and activities, along with the rationale for each rating.

Table 3.2-2: Summary of Residual Cumulative Effect Characterization for an Increase in Business Opportunities / Contracts to Indigenous Businesses

Residual Effect Characteristic	Rating	Rationale for Rating
Direction	Positive	The provision of contracts to Indigenous businesses is a beneficial / positive effect of the Project.
Magnitude	Moderate	The cumulative contribution to procurement from Indigenous businesses is rated moderate.
Geographic Extent	Beyond RSA	Beyond regional extent is predicted as projects and activities are likely to engage businesses, including Indigenous businesses, from the LSA, RSA, and beyond.
Duration	Long-term	The effect is predicted for the Construction phase (1.5 years) and Operation phase (21 years) of the Project.
Frequency	Frequent	This effect will take place as contracts are awarded on as needed basis.

Residual Effect Characteristic	Rating	Rationale for Rating
Reversibility	Partly Reversible	The effect is partially reversible, given that the removal of procurement opportunities at Project closure will not remove the skills, capacity, and relationships developed, providing lasting benefits to Indigenous businesses.
Context	Moderate	The context is predicted to be moderate given the opportunity to benefit from Project-related procurement and capacity-building.

Notes: LSA = Local Study Area; RDBN = Regional District of Bulkley-Nechako; RSA = Regional Study Area.

Direction = Whether the direction of the predicted effect is expected to be positive or adverse.

Magnitude = Size or severity of the residual effect measured in terms of the proportion of the VC affected within the LSA, relative to the range of natural variation or historic variation. **Low:** differs from the baseline conditions but remains within the range of natural variation. **Moderate:** differs substantially from baseline conditions and approaches the limits of natural variation. **High:** differs substantially from baseline conditions resulting in a detectable change beyond the range of natural variation.

Geographic Extent = Spatial scale over which the Economic Development VC residual effect is expected to occur. **LSA:** effect is limited to the LSA communities. **RDBN A and RDBN G:** effect takes place in the Electoral Areas. **RSA (RDBN plus Witset):** effect occurs in the RDBN and the community of Witset. **Beyond RSA:** effect occurs in the RSA, in the province and the rest of Canada.

Duration = Length of time over which the Economic Development VC residual effect is expected to persist. **Short-term:** less than 2 years. **Medium-term:** 2 to 5 years. **Long-term:** over 5 years.

Frequency = How often the Economic Development VC residual effect is expected to occur. **Infrequent:** effect occurs rarely and at sporadic intervals. **Frequent:** effect occurs on a regular/frequent basis. **Continuous:** effect occurs constantly.

Reversibility = Whether or not the Economic Development VC residual effect can be reversed once the activity causing the residual effect ceases. Irreversible effects are considered to be permanent. **Fully Reversible:** effect can be reversed. **Partially Reversible:** effect can be partially reversed. **Irreversible:** effect cannot be reversed.

Context = The extent to which Economic Development VC has been affected by past and present socio-economic processes and conditions, its potential sensitivity to the Project-related residual effect, and its ability to recover from that effect (i.e., resilience). **Low:** the receiving environment or population has a high natural resilience to imposed stresses and can respond and adapt to the effect. **Moderate:** the receiving environment or population has a neutral resilience to imposed stresses and may be able to respond and adapt to the effect. **High:** the receiving environment or population has a low resilience to imposed stresses and will not easily adapt to the effect.

The Likelihood of the residual cumulative effect occurring is rated Likely, and the significance determination is predicted to be Not Significant. Confidence in this assessment is Moderate due to uncertainties around the realization, scope, and timing of reasonably foreseeable projects, and the cumulative effects of those projects on procurement from Indigenous businesses.

3.3 INFRASTRUCTURE AND SERVICES

As described in Table 2.2-2, one new potential positive effect is predicted in response to Transition Order Schedule A Section C item (2b):

- Improved community infrastructure and services.

The Project and CEA in the subsequent sections follow the methodology outlined in the Infrastructure and Services VC Chapter of the EAC Application (Section 6.0, Chapter 3 of the EAC Application).

3.3.1 Assessment of Project Effects

3.3.1.1 Potential Effects

In the EAC Application, the Economic Development VC (Section 5.0, Chapter 2, Section 5.2 estimates the following:

- Total gross domestic product (GDP) benefit of the Project in BC resulting from direct, indirect, and induced activities, at \$65.2 million (CAD) for the Construction phase, of which \$25.4 million (CAD) is anticipated to be realized in the RDBN.
- Total tax revenue for the Construction phase is estimated at \$19.8 million (CAD) for BC, with \$9.5 million (CAD) from provincial tax payments and \$1.3 million (CAD) from payments of regional district and municipal taxes.
- Total GDP benefit of the Project in BC, resulting from direct, indirect, and induced operating activities, is estimated at \$1.96 billion (CAD) over the Operation phase (21 years), with the majority being realized in the RDBN.
- Total tax revenue for the Operation phase is estimated at \$1.57 billion (CAD) for BC, of which \$1.32 billion (CAD) is anticipated to be paid in provincial tax payments and \$20.9 million (CAD) originates from payments of regional district and municipal taxes.
- Annual distribution of municipal and provincial taxes paid in BC is anticipated to be up to \$1.2 million (CAD) in annual municipal taxes and up to \$71.6 million (CAD) in annual provincial tax revenue to the Government of BC.

In the EAC Application, the Infrastructure and Services VC (Section 6.0, Chapter 3, Section 5.2.1.1) and the Economic Development VC (Section 5.0, Chapter 2) sections state that the overall increase in the government tax base and GDP benefit will support local government to meet the change in demand of community infrastructure and services that could occur as a result of workforce immigration associated with Project. The period it would take for local government to meet an increased demand for community infrastructure and services, and to continue to improve services, cannot be determined. It is challenging to approximate the extent to which revenue generated

from the Project will be allocated towards improvements to community infrastructure and services, as budget allocation at the municipal and provincial government levels varies according to the needs and priorities of the population. Regardless, a positive effect on community infrastructure and services is predicted for the Operation phase of the Project; however, it should be acknowledged that the distribution of these effects may be potentially disproportionate across different sectors and regions, depending on local priorities and existing infrastructure gaps.

3.3.1.2 Mitigation Measures

Key mitigation measures identified for the Infrastructure and Services VC in the EAC Application (Section 6.0, Chapter 3, Section 5.3) that are relevant to the enhancement of the positive effect of improved community infrastructure and services include:

- Section 5.3.2 (Transport Measures) – provides measures to establish and maintain the Tenas Access Corridor to minimize traffic on existing roads.
- Section 5.3.3 (Housing Measures) – includes measures to promote local housing opportunities.
- Section 5.3.5 (Housing and Accommodation Program) – includes measures to assist employees of TML to own permanent housing in the region around the proposed Project.
- Section 5.3.7 (Childcare Program) – includes a commitment to fund at least one full-time position at a government approved childcare facility in RDBN and at least one full-time position with Indigenous groups at an approved childcare facility run by an Indigenous group in the region.

The Socio-economic Management Plan (SEMP) in the EAC Application includes performance targets that could contribute towards community infrastructure and services improvements (Section 13, Chapter 16, Section 7.1):

- To have at least two employees participate in Telkwa or Smithers volunteer fire departments or search and rescue.
- To fund a portion of an ambulance capable of advanced life support for Smithers.
- To establish mutual aid agreements with Smithers, Telkwa, Houston, and Witset within two years after Project construction is completed to assist with major incidents that may impact the region (such as forest fires and floods).
- To establish mutual aid agreements with key large industries such as the Red Chris Mine, Brucejack Mine, and Pacific Inland Resources so that if a major incident occurs at any of these operations the other companies can assist with response effort and resources to this incident.

The above mitigation measures have been developed to manage the adverse effects identified in the Project's EAC Application. No additional mitigation or enhancement measures are proposed.

3.3.1.3 Residual Effects and Significance

After implementing the proposed enhancement measures, a residual positive effect is predicted for improved community infrastructure and services during the Operation phase of the Project.

Table 3.3-1 in this Supplemental Report provides characterization of the residual effect and the rationale for each rating according to definitions in Section 6.0, Chapter 3, Table 5.4-1, of the EAC Application.

Table 3.3-1: Summary of Residual Effect Characterization for Improved Community Infrastructure and Services

Residual Effect Characteristic	Rating	Rationale for Rating
Direction	Positive	Increase in the government tax base and GDP benefit will support local government to meet the change in demand of community infrastructure and services that could occur because of the Project, leading to long-term improvements to infrastructure and services.
Magnitude	Low	It cannot be predicted how the tax revenue from the Project will be distributed towards improvements to community infrastructure and services. Minimal change to existing conditions is expected initially, and in the long-term a moderate change may occur, depending on allocation of funds and priorities.
Geographic Extent	Regional	The effect may extend to a portion of the RSA or all the RSA, depending on the allocation of government funds to improve community infrastructure and services.
Duration	Long-term	The improvement of community infrastructure and services may take place throughout the Operation phase of the Project.
Frequency	Frequent	Improvements to community infrastructure and services are likely to be regular; however, the Project has no control over the frequency and nature of improvements.
Reversibility	Partly Reversible	Once the Project no longer contributes to the GDP and tax revenue, additional funding to support community infrastructure and services from the Project may decline.

Residual Effect Characteristic	Rating	Rationale for Rating
Context	High	There are existing pressures on community services and infrastructure across the LSA and RSA, as described in the EAC Application.

Notes: GDP= gross domestic product; EAC = Environmental Assessment Certificate; LSA = Local Study Area; RDBN = Regional District of Bulkley-Nechako; RSA = Regional Study Area; VC= Valued Component.

Direction = Whether the direction of the predicted effect is expected to be positive or adverse.

Magnitude = The amount of change in measurable parameters relative to existing conditions. **Low:** There is minimal or no change in the availability and/or quality of community infrastructure and services. **Moderate:** There is a noticeable improvement to the availability and/or quality of community infrastructure and services. **High:** There is a measurable improvement to the availability and/or quality of community infrastructure and services.

Geographic Extent = The geographic area in which the residual effect is expected to occur. **Project Area:** The effect is restricted to the Project Area. **Local:** The effect is limited to the LSA or a portion of the LSA. **Regional:** The effect is limited to the RSA or a portion of the RSA. **Beyond Regional:** The effect extends beyond the RSA.

Duration = The length of time over which the residual effect is expected to persist before returning to existing conditions. **Short-term:** The effect is restricted to a period of up to two (2) years or less. **Medium-term:** The effect extends over a period of two (2) and 25 years. **Long-term:** The effect extends throughout the Project lifetime or permanently.

Frequency = How often the residual effect is expected to occur. **Infrequent:** The effect is not likely to occur or to occur sporadically. **Frequent:** The effect is likely to occur on a regular but not continuous basis. **Continuous:** The effect occurs continuously.

Reversibility = Whether a residual effect can be reversed once the activity causing the residual effect ceases. **Fully reversible:** Measurable parameters of the effect fully return to existing conditions after decommissioning and reclamation. **Partially reversible:** Measurable parameters of the effect partially return to existing conditions after decommissioning and reclamation. **Irreversible:** Measurable parameters of the effect fully remain after decommissioning and reclamation and are considered permanent.

Context = The extent to which Infrastructure and Services has been affected by past and present environmental and socio-economic processes and conditions, its potential sensitivity to the Project-related residual effect, and its ability to recover from that effect (i.e., resilience). **High:** Community infrastructure and services are under existing pressure and do not have the capacity to absorb an increased demand or use. **Moderate:** Community infrastructure and services are adequate and can absorb some additional demand or use. **Low:** Community infrastructure and services are not at capacity and there is scope to absorb a higher demand or use.

The Project may lead to improved community infrastructure and services because of the increased GDP and tax revenue from the Project. Given initial improvements to community infrastructure and services would mitigate the effects of increased demand from the Project, minimal change to existing conditions is expected initially, and as such the Magnitude is Low. In the long-term, improvements to community infrastructure and services may reflect a moderate change, depending on allocation of funds and priorities that are not within the control of TML.

The Likelihood of the residual effect occurring is rated Likely, as the Project will result in increased government revenue. The residual effect of improved community infrastructure and services is

rated as Not Significant⁷. The Level of Confidence in these predictions is Low as TML does not have control over the allocation of tax revenue, and the distribution and spend on improvements to community infrastructure and services cannot be determined.

3.3.2 Assessment of Cumulative Effects

3.3.2.1 Potential Cumulative Effects

The Project-related effect of improved community infrastructure and services during Operation was carried forward to the CEA. The assessment is based on consideration of identified residual effect characteristics; the socio-economic context for the Infrastructure and Services VC described in the EAC Application (Section 6.0, Chapter 3, Section 4.2); and the list of past, present, and reasonably foreseeable future projects and activities that may cumulatively interact with the Project and contribute to this beneficial effect (Section 6.0, Chapter 3, Table 6.1-1 of the EAC Application).

3.3.2.2 Additional Mitigation Measures

It is expected that other present and potential reasonably foreseeable future projects and activities would have similar enhancement measures in place to those listed in Section 3.3.1.2 of this Supplemental Report, to cumulatively improve community infrastructure and services. As such, additional enhancement measures for improved community infrastructure and services are not identified.

3.3.2.3 Residual Cumulative Effects and Significance

Project residual effects on improved community infrastructure and services may overlap with the effects of any one of the reasonably foreseeable future projects as taxes and government revenue from those projects may be directed towards improving community infrastructure and services. Additionally, future projects will also contribute to increased demand for community infrastructure and services.

Table 3.3-2 in this Supplemental Report provides characterization of the residual cumulative effect of improved community infrastructure and services in combination with those of other projects and activities, along with the rationale for each rating.

Table 3.3-2: Summary of Residual Cumulative Effect Characterization for Improved Community Infrastructure and Services

⁷ Significant residual effects occur when the residual effect is of High Magnitude and Long-term Duration, with Frequent or Continuous Frequency, with a High or Medium Context, and/or being Irreversible. Residual effects are Not Significant when any condition of Significant described above is not met.

Residual Effect Characteristic	Rating	Rationale for Rating
Direction	Positive	The long-term improvements to community infrastructure and services are a beneficial / positive effect of the Project.
Magnitude	Moderate	When considered in the context of cumulative effects, the magnitude is moderate. Given the nature and scale of the Project, the contribution to increased taxes and revenue is relatively small during the Operation phase.
Geographic Extent	Regional	The effect may extend to a portion of the RSA or all the RSA, depending on the allocation of government funds to improve community infrastructure and services.
Duration	Long-term	The improvement of community infrastructure and services may take place throughout the Operation phase of the Project.
Frequency	Continuous	Although the frequency may be continuous, improvements to community services and infrastructure may be sporadic.
Reversibility	Partly Reversible	Once the Project no longer contributes to the GDP and tax revenue, additional funding to support community infrastructure and services from the Project may decline.
Context	Moderate	There is existing pressure on community infrastructure and services in the LSA and RSA, as described in the EAC Application.

Notes: GDP= gross domestic product; EAC = Environmental Assessment Certificate; LSA = Local Study Area; RDBN = Regional District of Bulkley-Nechako; RSA = Regional Study Area; VC = Valued Component.

Direction = Whether the direction of the predicted effect is expected to be positive or adverse.

Magnitude = The amount of change in measurable parameters relative to existing conditions. **Low:** There is minimal or no change in the availability and/or quality of community infrastructure and services. **Moderate:** There is a noticeable improvement to the availability and/or quality of community infrastructure and services. **High:** There is a measurable improvement to the availability and/or quality of community infrastructure and services.

Geographic Extent = The geographic area in which the residual effect is expected to occur. **Project Area:** The effect is restricted to the Project Area. **Local:** The effect is limited to the LSA or a portion of the LSA. **Regional:** The effect is limited to the RSA or a portion of the RSA. **Beyond Regional:** The effect extends beyond the RSA.

Duration = The length of time over which the residual effect is expected to persist before returning to existing conditions. **Short-term:** The effect is restricted to a period of up to two (2) years or less. **Medium-term:** The effect extends over a period of two (2) and 25 years. **Long-term:** The effect extends throughout the Project lifetime or permanently.

Frequency = How often the residual effect is expected to occur. **Infrequent:** The effect is not likely to occur or to occur sporadically. **Frequent:** The effect is likely to occur on a regular but not continuous basis. **Continuous:** The effect occurs continuously.

Reversibility = Whether a residual effect can be reversed once the activity causing the residual effect ceases. **Fully reversible:** Measurable parameters of the effect fully return to existing conditions after decommissioning and reclamation. **Partially reversible:** Measurable parameters of the effect partially return to existing conditions after decommissioning and reclamation. **Irreversible:** Measurable parameters of the effect fully remain after decommissioning and reclamation and are considered permanent.

Context = The extent to which Infrastructure and Services has been affected by past and present environmental and socio-economic processes and conditions, its potential sensitivity to the Project-related residual effect, and its ability to recover from that effect (i.e., resilience). **High:** Community infrastructure and services are under existing pressure and do not have the capacity to absorb an increased demand or use. **Moderate:** Community infrastructure and services are adequate and can absorb some additional demand or use. **Low:** Community infrastructure and services are not at capacity and there is scope to absorb a higher demand or use.

The Likelihood of the residual cumulative effect occurring is rated Likely, and the significance determination is predicted to be Not Significant. The Confidence is Low as the allocation of spend towards improving community services and infrastructure is not within the control of the Project, and future projects cannot be determined.

4. LAND USE PLANNING

In response to Transition Order Schedule A Section C item (5), this section provides supplementary information to describe how the Project is consistent with federal, provincial, and local (i.e., regional districts and municipal) government land use plans and Indigenous nations' land use plans.

4.1 FEDERAL, PROVINCIAL AND LOCAL LAND USE PLANS

This Supplemental Report includes the relevant federal, provincial, and local (i.e., regional districts and municipal) land use plans of these three levels of government. Table 4.1-1 in this Supplemental Report provides an overview of information on land use plans of federal, provincial, and local governments provided in the Land and Resource Use VC Chapter in the EAC Application (Section 6.0, Chapter 4), the Land and Resource Use Baseline Report (Section 6.0, Chapter 4, Appendix 6.4-A, in the EAC Application) and this Supplemental Report.

Table 4.1-1: Relevant Information in the EAC Application and this Supplemental Report for Federal, Provincial, and Local Land Use Plans

EAC Application	Supplemental Report	Limitations
- Provides a brief overview of the 1998 Bulkley LRMP (Government of BC 1998) including Bulkley RAMP (Ministry of Forests and Range 1997). - Provides a brief overview of the Bulkley Valley SRMP (Government of BC 2005) and Project overlap with RMZs. - Provides a brief overview of the Morice LRMP (Government of BC 2007). - Provides a brief overview of the Smithers Telkwa Rural OCP (RDBN 2014). - Provides a brief overview of the Houston, Topley, Granisle Rural OCP (RDBN 2011).	- Provides additional information on RMZs and Sub-unit 7-1 (overlapping with the Project Area and Land and Resource Use LSA) from the Bulkley LRMP (Government of BC 1998), LUPs, and Summer RAMP (BVCRB 2013). - Provides additional information on area overlap with the Project Area and Land and Resource Use LSA from the Bulkley Valley SRMP (Government of BC 2005). - Provides additional information on RMZ overlap with the Land and Resource Use RSA from the Morice LRMP (Government of BC 2007). - Provides additional information on land designation overlap with the Project Area from the Smithers Telkwa Rural OCP (RDBN 2014).	None noted.

Notes: BC = British Columbia; BVCRB = Bulkley Valley Community Resources Board; EAC = Environmental Assessment Certificate; EAO = Environmental Assessment Office; IRM = Integrated Resource Management; LRMP = Land and Resource Management Plan; LSA = Local Study Area; LUP = Landscape Unit Plan; OCP = Official Community Plan; RAMP = Recreational Access Management Plan; RDBN = Regional District of Bulkley-Nechako; RMZ = Resource Management Zone; RSA = Regional Study Area; SRMP = Sustainable Resource Management Plan; VC = Valued Component.

There are no federal land use plans or similar plans. The proposed Project is located within the Bulkley Land and Resource Management Plan (LRMP), located southwest of Telkwa and south of Smithers. As designated under the Bulkley LRMP, the Project footprint overlaps with two Integrated Resource Management (IRM) Zones (7-1, Bulkley Valley IRM; and 11-4, Goathorn Creek IRM) where mining is a recognized resource value and activity alongside other resource values and activities including timber harvesting, grazing, tourism, wildlife, and recreation.

The proposed Project will be constructed and operated in compliance with relevant federal, provincial, and local land use plans that overlap with the Project Area and the Land and Resource Use LSA and RSA.

4.1.1 Bulkley Land and Resource Management Plan

The Bulkley LRMP was developed by BC through a process involving the provincial and local governments, First Nations, and the Bulkley Valley Community Resources Board (BVCRB; Government of BC 1998). The BVCRB is a group of citizens who provide input on local land use decisions and monitor the implementation of these land use plans since its establishment in 1991 when the Bulkley LRMP was developed (BCVRB 2024). The Bulkley LRMP was developed around biodiversity values, as well as other values including those for timber, fisheries, water quality, wildlife, agriculture, range, outdoor recreation, tourism, and subsurface resources (Government of BC 1998).

The Project Area and Land and Resource Use LSA overlap with the IRM Zone, Agriculture/Wildlife Zone, and Settlement 2 Zone. The overlap with the IRM Zone involves two Sub-units: 7-1 Bulkley Valley IRM and 11-4 Goathorn Creek IRM. The IRM zones identify areas where a range of resource values and activities are recognized and given equal consideration. Example resource values and activities include timber harvesting, mining, grazing, tourism, wildlife, and recreation.

The objective for the Bulkley Valley IRM Sub-unit 7-1 is “to manage for a variety of values and activities in an integrated and compatible manner and to ensure the management of biodiversity is a priority on remaining Crown Land” (Government of BC 1998, p. 80). The list of Sub-unit 7-1 management categories and specific directions are included in Table 4.1-2 in this Supplemental Report. The objective for the Goathorn Creek IRM Sub-unit 11-4 is “to manage for a variety of values and activities in an integrated and compatible manner” (Government of BC 1998, p. 99-100). The list of management categories and specific directions for Sub-unit 11-4 is provided in the EAC Application (Appendix A.1 of Appendix 6.4A, Land and Resource Use Baseline).

The Land and Resource Use RSA also overlap with Settlement 1, Special Management 1, Special Management 2, Agriculture/Wildlife, and Protected zones. Definitions for each IRM Zone is provided in the EAC Application (Section 3.1.1 of Appendix 6.4A, Land and Resource Use Baseline).

Table 4.1-2: Bulkley Land and Resource Management Plan, Sub-unit 7-1, Bulkley Valley Integrated Resource Management Zone Management Categories and Specific Directions

EAC Application	Supplemental Report
Biodiversity	• The management of biodiversity will be a priority on Crown Land. • Agencies will cooperate with landowners and coordinate planning with other levels of government in the implementation of the Ecosystem Network. • Retain significant recreation sites and areas of significant biodiversity as Crown Land. • Undertake inventories of red and blue-listed plant species and ecosystems. • Manage Call Lake as a Goal 2 Protected Area.
Access	• Ensure Malkow Lookout access is non-motorized only.
Timber Management	• Harvesting and management will be sensitive to all other resources: urban, agriculture, wildlife, fisheries, water, urban/rural interface. • Place a high priority on Provincial Forest Land for integrating biodiversity and wildlife with timber management.
Water Quality	• Maintain and restore quality on Bulkley and Telkwa Rivers and their tributaries. • Maintain and restore water quality in all valley bottom lakes.
Fish and Wildlife Habitat	• Agencies will focus management on winter habitat for ungulates, migratory birds, and fisheries in the Bulkley and Telkwa rivers. • Encourage local government to require future land developments to provide wildlife and aquatic habitat. • Promote conservation covenants for habitat protection. • Toboggan and Kathlyn creeks are regionally significant spawning areas, and the associated watersheds are a priority for watershed assessments.
Visual Quality	• Consider visual quality in community and resource development planning, especially travel corridors: Highway 16, Bulkley River, and Telkwa High Road.
Range Management	• Sustain and enhance the agricultural industry in this planning unit. • Foster and encourage cooperation between range and other users and land values. • Foster cooperation in agricultural land development for biodiversity and sustainability. • New tenures will encourage biodiversity guidelines. • Give notification (including to surrounding residents) before new agriculture leases are issued.
Outdoor Recreation and Tourism	• Agencies will provide management to address recreational user conflicts, including the Bulkley River. • Encourage use of this planning unit as the front country service hub for tourism and recreation in the planning area.

EAC Application	Supplemental Report
Subsurface Resources	• Maintain opportunities for coal, sand, and gravel resource extraction. • Consider coal resource development impacts on Telkwa River at all stages of exploration and development.
Cultural Heritage Sites	• Development will be sensitive to the high archeological potential of this planning unit.
Future Planning Processes	• Agencies will consult with local government before issuing new long-term tenures or proceeding with development plans, and when reviewing Crown Land resource management proposals. The RDBN and municipalities will be encouraged to consult with resource agencies when changing OCPs.

Source: Government of BC (1998)

Notes: OCP = Official Community Plan, RDBN = Regional District of Bulkley-Nechako.

While the Project is compatible with the LRMP designations, the areas overlapping the Land and Resource Use LSA and RSA are summarized below.

Landscape Units are parcels within the Bulkley LRMP Area with associated objectives that assist in implementing the ecosystem network and enhanced timber development areas (Government of BC 1998). The Project Area overlaps with Telkwa Landscape Unit. The Land and Resource Use LSA overlaps with the Telkwa and Bulkley Valley Landscape Units. The Land and Resource Use RSA overlaps with Telkwa, Bulkley Valley, Deep Creek, and Reiserter Landscape Units. Each Landscape Unit has a Landscape Unit Plan (LUP) with the following values covered by legal land use objectives and strategies (Government of BC 1998):

- Telkwa LUP: Biodiversity; Wildlife; Fish; LRMP Special Management Zones; Timber; Recreation; Visual Quality; and Access;
- Bulkley Valley LUP: n/a (remains as policy; see Section 3.1.2, Bulkley Valley Sustainable Resource Management Plan);
- Deep Creek LUP: Biodiversity; Wildlife; Fish; LRMP Special Management Zones; Timber; Recreation; Visual Quality; and Access; and
- Reiserter LUP: Wildlife; Fish; LRMP Special Management Zones; Timber; Recreation; and Visual Quality.

The Project is consistent with the Bulkley LRMP as the environmental management system for the Project will include a Reclamation and Closure Plan (RCP) including a soil salvage and management and biodiversity plan. The RCP further supports consistency with the Bulkley LRMP as the reclamation and closure management outlined in the RCP acknowledges how visual quality is an important consideration for all resource development projects within the Bulkley LRMP. The RCP includes an overarching land-capability objective, to the extent possible, to return the Project footprint to climate shifted pre-Project ecosystems in the proportion that they existed

prior to the development of the Project, as outlined in the EAC Application (Section 13.0, Chapter 15). In addition, the residual adverse effects for land and resource use are predicted to extend only to the Land and Resource Use LSA. The residual cumulative effects for land and resource use are also predicted to extend only to the Land and Resource Use LSA.

Further information on the Bulkley LRMP is provided in the EAC Application (Section 3.1.1 of Appendix 6.4-A, Land and Resource Use Baseline).

4.1.1.1 Summer Recreational Access Management Plan

The BVCRB established a Summer Recreational Access Management Plan (RAMP) in 2013. The Summer RAMP provides community-based recommendations to the provincial government regarding recreational activities identified in the sites, trails, and lakes within the Bulkley Timber Supply Area guided by management directions identified in the Bulkley LRMP, the Bulkley Portion of the 1997 Skeena Stikine Forest District RAMP, and other existing access agreements developed since then (BVCRB 2013). The Summer RAMP also proposes a process for managing future access initiatives and a proposal for managing more intensive forms of motorized recreational use. The seven specific recommendations are summarized as follows:

- Recommendation 1: Management agencies responsible for gates on Crown Land implement the Controlled Access Policy Proposal⁸;
- Recommendation 2: Government agencies designate the uses for sites and trails identified⁹ and set objectives for them where applicable;
- Recommendation 3: Recreation Sites and Trails BC supports exploration of the Intensive Motorized Area concept, by an identified champion organization;
- Recommendation 4: The BVCRB includes in its Terms of Reference, and ensures implementation of, the Future Planning Process¹⁰;
- Recommendation 5: Government agencies and clubs work to ensure people with limited mobility have better access to high quality recreation areas. BVCRB (in cooperation with the Bulkley Valley Research Centre) sponsors a focused research project in this area;

⁸ The Controlled Access Policy Proposal (Summer RAMP, Appendix 5) sets out an objective to establish conditions under which motorized vehicle access can be granted through the gate for permitted recreational land use.

⁹ Identified sites and trails which are within the Bulkley LRMP are listed on Table 2, Summary of Summer Site and Trail Usage Recommendations (Summer RAMP).

¹⁰ The Future Planning Process outlines two proposed options for a recreational related proposal or for a potential conflict: 1. BVCRB to continue with its agreement to receive referral notices from the provincial government about activities that may conflict recreation; and 2. The proponent of a proposal or person/group making a complaint to contact the BVCRB to request a review of the issue, with BVCRB to respond with a recommendation to the proponent and to government decision-making agencies.

- Recommendation 6: Government agencies, in association with the BVCRB, ensure that digital data sets of recreation sites and trails are available to the public; and
- Recommendation 7: The BVCRB conducts a timely review of the Summer RAMP.

The Summer RAMP overlaps with the Project Area, LSA, and RSA. Although the Project is consistent with the Summer RAMP, as it is an allowable activity, the Land and Resource Use VC Chapter (Section 6.0, Chapter 4 of the EAC Application) identified residual effects on public recreation use, specifically on change in access, change in sensory disturbance, and change in quantity and quality of resources. Residual effects are rated as Moderate in Magnitude, Medium to Long-term in Duration, and Not Significant. The Environmental Management System for the Project will include mitigation measures and monitoring plans relevant to recreational activities, including the Minesite Traffic Control Plan (Section 13.0, Chapter 10 in the EAC Application), the Public Access Management Plan (Section 13.0, Chapter 14 in the EAC Application), and the RCP (Section 13.0, Chapter 15 in the EAC Application). Each plan details its purpose and objectives, compliance obligations, program details, mitigation measures, monitoring, reporting, roles and responsibilities, communication, evaluation, and adaptive management, and change management approaches.

4.1.2 Bulkley Valley Sustainable Resource Management Plan

The Project Area overlaps with the Bulkley Valley Sustainable Resource Management Plan (SRMP) planning area (or Bulkley Landscape Unit) including Visual Quality Objectives (VQO), which allow acceptable degrees of change from land use alterations such as logging or road building. These VQOs are developed for forestry. As such, operational plans, such as forest development plans and access management plans, need to show they are consistent in achieving these VQOs. The Land and Resource Use LSA also overlaps a Wildlife Habitat Management Area (north of the existing 25 kilovolt Power Line and Proposed Water Pipeline) whose strategy includes that “infrastructure development may occur where compatible with wildlife and habitat conservation objectives” (p. 33, Government of BC 2005).

Bulkley Valley SRMP objectives may be enacted where legislation and regulations currently exist, become policy, and considered best management practices, or be considered as recommendations for government, industry, and private landowners. The Bulkley Valley SRMP was developed under BC’s two-zone system for land use planning, which required the clear identification of whether land was either open or closed for mineral exploration and mining. Under the Bulkley Valley SRMP, for subsurface resources and mineral exploration, for example, the general management direction is to provide the opportunity for safe, efficient, and environmentally sound development and use of energy and mineral resources for the economic benefit of the Bulkley SRMP area. These objectives provide direction for a wide range of resource values, as listed in Table 4.1-3.

Table 4.1-3: Bulkley Valley Sustainable Resource Management Plan: Resource Values

Bulkley Valley SRMP: Resource Values
• Biodiversity; • Timber Management; • Water Quality and Quantity; • Fish Habitat and Fisheries; • Wildlife; • Agriculture Development Areas and Wildlife Management Areas; • Visual Quality; • Range and Agriculture; • Recreation and Tourism; • Subsurface Resources and Mineral Exploration; • Transportation and Access; • Cultural Heritage; • Air Quality; • Soil Conservation; and • Settlement Zone.

Source: Government of BC (2005)

Notes: SRMP = Sustainable Resource Management Plan

The Project is consistent with the Bulkley Valley SRMP and will include mitigation measures and monitoring plans that further support the Bulkley Valley SRMP objectives.

Further information on the Bulkley Valley SRMP is provided in the EAC Application (Section 3.1.2 and Appendix A.2 of Appendix 6.4A, Land and Resource Use Baseline).

4.1.3 Morice Land and Resource Management Plan

The Project Area and Land and Resource Use LSA do not overlap with the Morice LRMP (Government of BC 2007). The Project Area is located approximately 9 km northeast from the Morice LRMP. However, the Land and Resource Use RSA overlaps with RMZs identified under the General Management Direction (specifically a General Forested Area; and High Biodiversity Emphasis Area) and Area Specific Management Direction (specifically no timber harvesting areas). The General Management Direction applies to all values and resources on provincial Crown Land and serves as a baseline for management. The Area Specific Management Direction are incremental to General Management Direction and includes 20 RMZs with distinct biophysical characteristics and resource issues and consider mineral exploration and development as acceptable practices. The Morice LRMP goals are listed in Table 4.1-4 in this Supplemental Report.

The Project is consistent with the Morice LRMP.

Further information on the Morice LRMP is provided in the EAC Application (Section 3.1.3 of Appendix 6.4-A, Land and Resource Use Baseline).

Table 4.1-4: Morice Land and Resource Management Plan: Goals

Morice LRMP: Goals
• Diverse cultural values are respected and shared values are recognized; • Issues relating to First Nations processes pertaining to rights and title are respected; • Healthy air, water, and soil; • A full range of ecosystems with natural processes, function, and pattern; • Native species and ecosystems within the range of natural variation (including old growth dependent species); • Stable access to a sustainable supply of natural resources; • Profitable investment opportunities; • A diverse economy supporting an increase in value-added processing; • Resource management and manufacturing that maximizes local benefits; • Opportunities for diverse jobs and lifestyles; • Development that honours and respects the land, ecosystems, and communities; • Safe communities where citizens can live, work, and recreate; • Harmonious and integrated use of the landscape among different users; • Optimal social and economic value from utilization of natural resources; • Opportunities for future generations to learn from living on the land; • Local public participation in resource management decisions; and • Continual improvement through monitoring and adaptive management.

Source: Government of BC (2007)

Notes: LRMP = Land and Resource Management Plan

4.1.4 Smithers Telkwa Rural Official Community Plan

The Smithers Telkwa Rural Official Community Plan (OCP) (Electoral Area A) outlines goals, objectives, and policies to reflect its rural community aspirations with respect to the future character, function, and form of its area. It is not a land use, subdivision, or development regulation, but instead provides direction regarding planning and development within the Plan area by the public, RDBN Directors, staff, and other governments (RDBN 2014).

The Project Area and Land and Resource Use LSA and RSA overlaps with the Smithers Telkwa Rural OCP.

According to Schedule “B”, Land Use Designation Map, of the Smithers Telkwa Rural OCP, the Project overlaps with four land designations: Agriculture, Rural Resource, Rural Residential, and Industrial. Agriculture designation objectives include protecting and preserving farmland and soil.

Rural Resource designation objectives include preserving lands within the OCP area for research and education purposes, forestry, agriculture, mineral or aggregate extraction, fish and wildlife management, trapping, wilderness-oriented recreation and necessary institutional, public, utility or transportation services. Rural Residential designation objectives include providing opportunities for residential lots to support the existing rural character of the OCP area. Industrial designation objectives include providing opportunities for heavy and light industrial uses while minimizing conflicts between industry and land uses (RDBN 2014).

The Project is consistent with the Smithers Telkwa OCP as this is an allowable activity.

Further information on the Smithers Telkwa Rural OCP is provided in the EAC Application (Section 3.1.4 and Appendix A.3 of Appendix 6.4-A, Land and Resource Use Baseline).

4.2 INDIGENOUS NATION LAND USE PLANS

TML welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. TML notes that comments OW-004, OW-170 and OW-186 are related to OW's plans for land use, including information discussed in this section of the *Environmental Assessment Transition Order Supplemental Report*.

Table 4.2-1 in this Supplemental Report provides an overview of information on existing land use plans of Indigenous nations provided in the Land and Resource Use VC Chapter in the EAC Application (Section 6.0, Chapter 4), the Land and Resource Use Baseline Report (Section 6.0, Chapter 4, Appendix 6.4-A, in the EAC Application) and this Supplemental Report.

Table 4.2-1: Relevant Information in the EAC Application and this Supplemental Report for Existing Indigenous Nation Land Use Plans

EAC Application	Supplemental Report	Limitations
- Provides an overview of the Witset First Nation Community Land Use Plan (Witset First Nation 2018a). - Provides an overview of the Witset First Nation Comprehensive Community Plan (Witset First Nation 2018b).	- Provides additional information on Jean Baptiste 28 reserve (overlapping with the Land and Resource Use RSA) on the Witset First Nation Community Land Use Plan (Witset First Nation 2018a). - Provides a brief overview of the WWSP (overlapping with the Land and Resource Use RSA) and the nine Guiding Principles (WWSP 2023).	None noted.

Notes: BC = British Columbia; EAC = Environmental Assessment Certificate; EAO = Environmental Assessment Office; LSA = Local Study Area; RSA = Regional Study Area; WWSP = Widzin Kwah Water Sustainability Project.

The Project Area does not overlap areas covered by any Indigenous nation land use plans. The Project will be constructed and operated consistent with all existing Indigenous nation land use plans that overlap with the Project's Land and Resource Use LSA and RSA.

4.2.1 Jean Baptiste 28 Reserve – Witset First Nation Community Land Use Plan

The Witset First Nation Community Land Use Plan provides a framework for land use and development within Jean Baptiste 28, one of seven reserves which overlaps with the Land and Resource Use RSA, located approximately 19 km away from the Project Area, and not connected hydrologically to the Project. The area addressed by this land use plan does not directly overlap the Project Area and the values managed by it are not predicted to be affected by the Project. Jean Baptiste is geographically removed from the main community area and land uses include forest and agriculture. There are three homes on reserve, two of which are occupied by members. There are no community facilities located on the reserve (Witset First Nation 2018a).

The Project is not within the areas covered by the Witset First Nation Community Land Use Plan. In addition, all residual adverse effects for land and resource use are predicted to extend only to the Land and Resource Use LSA in which the Witset First Nation Community Land Use Plan does not overlap with. Therefore, the effects of the Project would not impact the values identified within the plan. Further information on the Witset First Nation Community Land Use Plan is provided in the EAC Application (Section 6.0, Chapter 4, Section 4.2.1.3).

4.2.2 Widzin Kwah Water Sustainability Project

The Widzin Kwah Water Sustainability Project (WWSP) is a watershed planning process based on Skeena Sustainability Assessment Forum¹¹ data, jointly led by the Office of the Wet'suwet'en and the Province of BC. The WWSP has the goal to develop and recommend for approval of new objectives and management direction for the WWSP plan boundary, with the purpose of "maintaining and improving watershed health (condition) and integrity (function)" (WWSP 2023).

The WWSP is located approximately 9 km away from the Project and is not connected hydrologically to the Project. The area addressed by this land use plan does not directly overlap the Project and the values managed by it are not predicted to be affected by the Project. The Project footprint exists within the Tenas Creek and Goathorn Creek watersheds, both of which drain in the Bulkley River at a point downstream of the WWSP Boundary. The Land and Resource Use RSA overlaps with the southern portion of the Lower Bulkley River (Widzin Kwah), near Houston BC. As the WWSP is a planning process that is underway, no objectives have been established yet. Figure 4.2-1 presents the full plan boundary of the WWSP, followed by Figure 4.2-2 which presents the Project Land and Resource Use RSA overlap with the WWSP.

¹¹ The Skeena Sustainability Assessment Forum is a framework that outlines an understanding reached between the Province of BC and participating Indigenous nations including the Office of the Wet'suwet'en and Witset First Nation. As of May 2024, the Skeena Sustainability Assessment Forum is "establishing a process for collecting trusted data and designing and implementing environmental assessment and monitoring protocols" (Government of BC 2024b).

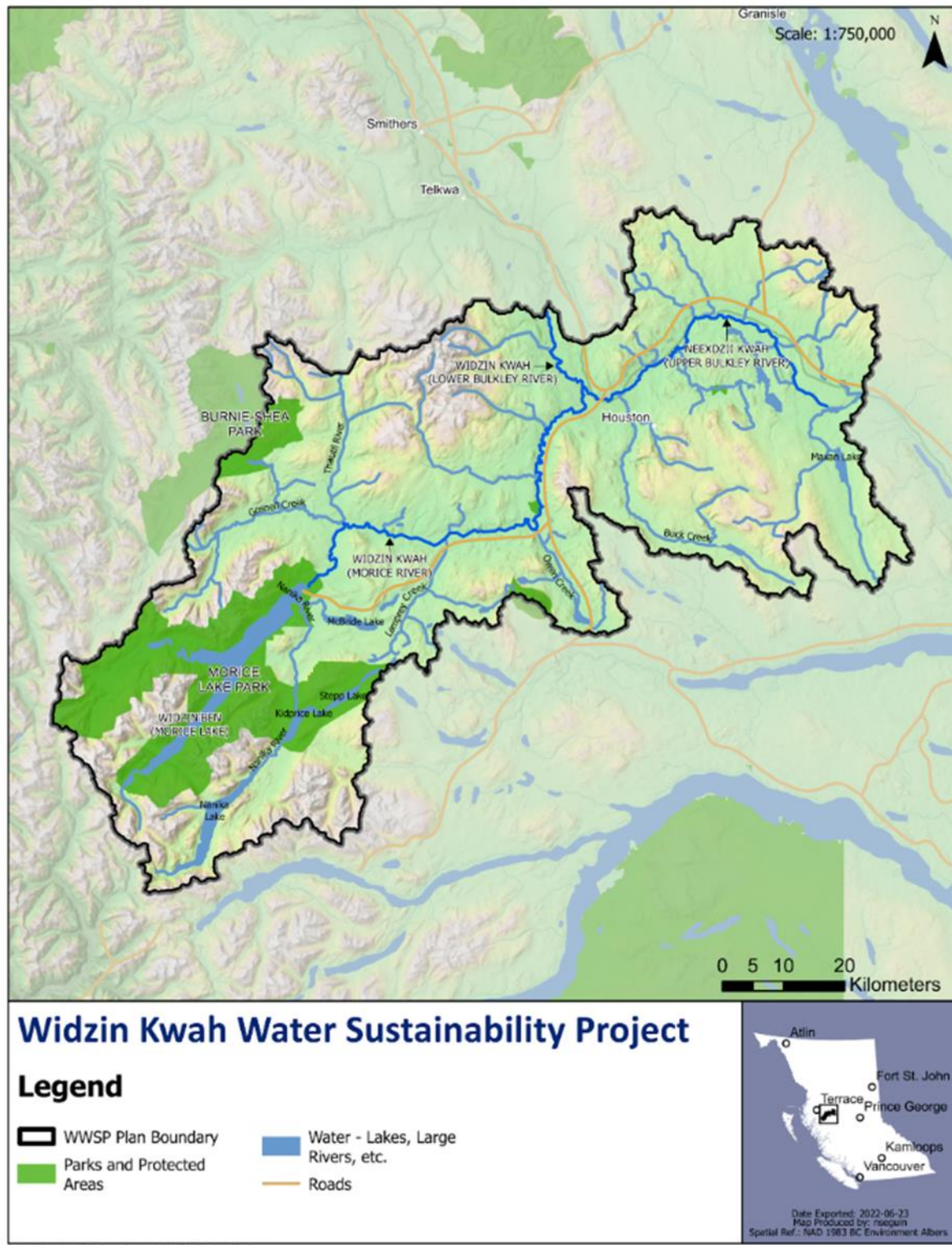


Figure 4.2-1: Widzin Kwah Water Sustainability Project Plan Boundary

Source: WWSP (2023)

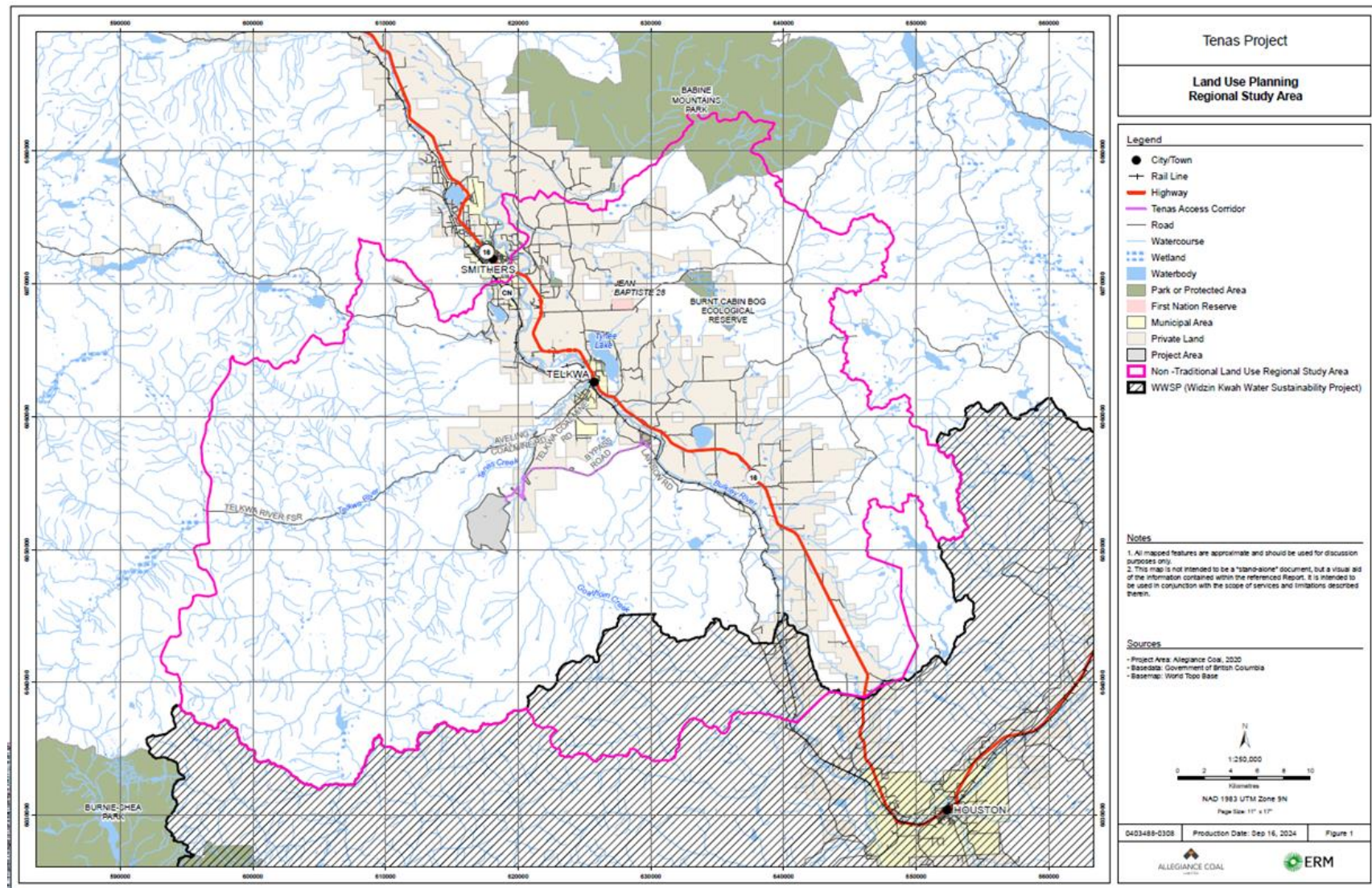


Figure 4.2-2: Land and Resource Use Regional Study Area Overlap with the Widzin Kwah Water Sustainability Project Plan

5. REFERENCES

- British Columbia Environmental Assessment Office (BC EAO). 2020. *Effects Assessment Policy*. Victoria: BC EAO. April.
- Bulkley Valley Community Resources Board (BVCRB). 2013. *Summer Recreational Access Management Plan*.
https://bvcrb.ca/images/uploads/documents/SUMMER_RAMP_REPORT_FEB_18_2013.pdf (accessed August 26, 2024).
- Bulkley Valley Community Resources Board (BVCRB). 2024. *Bulkley Valley Community Resources Board website*. <https://bvcrb.ca/about/> (accessed August 26, 2024).
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). 2024. *Registered Population, Wet'suwet'en First Nation*. https://fnp-ppn.aadnc-aandc.gc.ca/fnp/Main/Search/FNRegPopulation.aspx?BAND_NUMBER=725&lang=eng (accessed October 10, 2024).
- Government of BC. 1998. *Bulkley Land and Resource Management Plan*.
<https://www2.gov.bc.ca/gov/content/industry/crown-land-water/land-use-planning/regions/skeena/bulkley-lrmp> (accessed August 26, 2024).
- Government of BC. 2002. *Environmental Assessment Act*, SBC 2002, c. 43.
<https://canlii.ca/t/ktj1>.
- Government of BC. 2005. *Bulkley Valley Sustainable Resource Management Plan*.
<https://www2.gov.bc.ca/gov/content/industry/crown-land-water/land-use-planning/regions/skeena/bulkley-lrmp/bulkleyvalley-srmp> (accessed August 29, 2024).
- Government of BC. 2007. *Morice Land and Resource Management Plan*.
https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-resource-use/land-water-use/crown-land/land-use-plans-and-objectives/skeena-region/morice-lrmp/morice_lrmp_july2007.pdf (accessed August 27, 2024).
- Government of BC. 2018. *Environmental Assessment Act*, SBC 2018, c. 51.
<https://canlii.ca/t/55xbd>
- Government of BC. 2024a. *Celebrating Indigenous Economies in B.C.*
<https://www.britishcolumbia.ca/news-stories/celebrating-indigenous-economies-in-b-c/> (accessed October 10, 2024).
- Government of BC. 2024b. *Skeena*. <https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/cumulative-effects-framework/regional-assessments/skeena> (accessed August 29, 2024).

Ministry of Forests and Range. 1997. *Recreational Access Management Plan (RAMP) For the Bulkley portion of the Skeena Stikine Forest District*.

<https://www.for.gov.bc.ca/dss/RAMP/RAMPtoc.htm> (accessed November 7, 2024).

Regional District of Bulkley-Nechako (RDBN). 2014. *Smithers Telkwa Rural Official Community Plan*.

<https://www.rdbn.bc.ca/departments/planning/land-use-planning/official-community-plans> (accessed August 28, 2024).

Statistics Canada. 2023. *Table 98-10-0588-01 Employment Income Statistics by Industry Sectors, Indigenous Identity, Highest Level of Education, Work Activity During the Reference Year, Age and Gender: Canada, Provinces, and Territories, Census Metropolitan Areas, and Census Agglomerations With Parts*.

<https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=9810058801>

(accessed August 28, 2024).

Witset First Nation. 2018a. *Community Land Use Plan*.

https://www.witset.ca/files/ugd/f330f7_8ca79d78a5614a54a653a6bd98f3e1f7.pdf

(accessed August 29, 2024).

Witset First Nation. 2018b. *Comprehensive Community Plan*.

https://www.witset.ca/files/ugd/f330f7_4b1a7de9b92b4fa0936174cf2bb4fbf7.pdf

(accessed August 29, 2024).

Widzin Kwah Water Sustainability Project (WWSP). 2023. *About*.

<https://www.widzinkwahproject.ca/about-project> (accessed August 29, 2024).

Enclosure 2

**TENAS PROJECT ENVIRONMENTAL ASSESSMENT—
TELKWA MINING’S RESPONSES TO THE OFFICE OF
THE WET’SUWET’EN’S COMMENTS PROVIDED IN 28
FEBRUARY 2025 LETTER WITH THE SUBJECT “OFFICE
OF THE WET’SUWET’EN RESPONSE TO TELKWA
MINING LIMITED’S NOVEMBER 28, 2024, LETTER
RE: IR STATUS”; 12 MARCH 2025 LETTER WITH THE
SUBJECT “INFORMATION REQUESTS REGARDING
IMPACTS TO CARIBOU AND AQUATIC RESOURCES
FOR THE TENAS COAL PROJECT”; AND 15 MAY 2025
EMAIL WITH THE SUBJECT “SECTION 25 IR RESPONSE
– OW REVIEW”**

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-001	521	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C)1	1. Any positive effects to Indigenous interests or Indigenous nations that are anticipated as a result of (see below)	This will require that the Proponent: a) Provide all the IR-related documents for review; b) Provide more detailed information about positive effects the Proponent proposes to benefit the Wet'suwet'en; c) Consider information provided by OW and the Houses regarding positive effects; d) Consider forthcoming information from OW and the Houses aimed at determining whether TML has adequately identified and addressed negative effects. This will include reviewing relevant monitoring, mitigation, and management plans. It is possible for potentially negative socio-economic effects to be turned into positive effects with appropriate planning, for example, funding into socio-economic programs to offset potential risks from the project. As an important administrative note, Telkwa Mining Limited (TML) has not referenced the reports they produced in response to each IR set out in the EAO's Transition Order. Can TML please correct this throughout this table and any other IR-related documents to ensure clarity and accessibility in this process?	Telkwa Mining acknowledges the comment. a) All documents related to IRs have been submitted to the EAO, which has shared them with the Technical Advisory Committee and has posted them online to the EAO Project Information Centre. Please refer to Attachments OW-001-1, OW-001-2 and OW-001-3. b) The positive effects of the Project are assessed in Chapters 5.1, Labour Market, and 5.2, Economic Development of the EAC Application (please refer to Attachments OW-001-1 and OW-001-2). In consideration of this information, the Environmental Assessment Transition Order Supplemental Report, prepared in February 2025, provides additional information on potential positive effects, including those to Indigenous groups. No additional assessment of the positive effects on the Wet'suwet'en has been conducted to date (please refer to Attachment OW-001-3) Telkwa Mining recognizes that while Telkwa Mining is specifically targeting employment opportunities for individuals from the Wet'suwet'en, no specific commitments or agreements have been signed to date with the OW and the Houses to define the size of the potential benefits. However, Telkwa Mining is targeting approximately 15% of the overall workforce to have a Wet'suwet'en background. c) No information has been provided by the OW and the Houses regarding the positive effects. Telkwa Mining is looking forward to reviewing the RIA, CUS, and Wellbeing Study once they are available as well as considering any additional information

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					provided by the OW. d) Telkwa Mining will consider any forthcoming information from the OW and the Houses. Telkwa Mining recognizes that funding for socioeconomic programs, or other measures to offset the potential negative effects or risks from the Project, would be considered as a mitigation measure. Telkwa Mining is committed to working with the Wet'suwet'en to identify potential socioeconomic programs and other measures to offset potential negative effects or risks from the Project. Telkwa Mining clarifies that page ii of the Environmental Assessment Transition Order Supplemental Report, prepared in February 2025 (Attachment OW-001-03), lists the considered VCs that were assessed as part of the EAC Application for the Project. These included the following: - Atmospheric Environment (Chapter 4.1) - Terrain and Soils (Chapter 4.2) - Surface Water (Chapter 4.3) - Groundwater (Chapter 4.4) - Aquatic Resources (Chapter 4.5) - Fish and Fish Habitat (Chapter 4.6) - Vegetation (Chapter 4.7) - Wildlife (Chapter 4.8) - Avian Species (Chapter 4.9) - Labour Market (Chapter 5.1) - Economic Development (Chapter 5.2) - Demographics (Chapter 6.1)

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					- Visual Resources (Chapter 6.2) - Infrastructure and Services (Chapter 6.3) - Land and Resource Use (Chapter 6.4) - Community Well-being (Chapter 6.5) - Heritage Resources (Chapter 7.1) - Human Health (Chapter 8.1) - Wet'suwet'en Rights and Interests (Section 11.0) As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to any positive and/or negative effects to Indigenous interests or Indigenous Nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-002	New	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C)1	1. Any positive effects to Indigenous interests or Indigenous nations that are anticipated as a result of	N/A - comment only	Telkwa Mining acknowledges the comment.
OW-003	New	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C)1	1. Any positive effects to Indigenous interests or Indigenous nations that are anticipated as a result of	N/A - comment only	Telkwa Mining acknowledges the comment.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-004	521	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C)2	1. The positive and negative indirect effects of the Project, including a. Long-term trends (e.g., changing environment, cumulative impacts of development, employment, and technology) and market fluctuations. b. Anticipated positive effects, any uncertainties related to those effects, how those effects will be monitored and, in the event those effects prove to be negative, in whole or in part, how the negative effects will be adaptively managed, mitigated, and in the case of impacts to Indigenous interests, accommodated.	This will require that the Proponent: a) Provide all the IR-related documents for review; b) Provide further information as requested by OW in forthcoming reviews of TML's supplemental material to assess the positive and negative indirect effects from the Project; c) Consider forthcoming information from OW and the House Groups regarding whether TML has adequately monitored, mitigated, and managed these effects.	Telkwa Mining acknowledges the comment. a) All documents related to IRs have been submitted to the EAO. The EAO has shared them with the Technical Advisory Committee and has posted them online via the EAO Project Information Centre. The previous tracking tables for IRs notes any corresponding documents. b) Telkwa Mining has responded to the additional requests from the OW in this tracking table. c) Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs the ongoing mitigation and monitoring planning for the Project.
OW-005	100, 102	Tenas Project Order Under Section 78(7) dated Dec 16,	3. Disproportionate effects on distinct human populations, including populations identified by gender, including: a. The		Telkwa Mining acknowledges the comment. Response to OW letters of 28 February and 12 March 2025 and May 15, 2022 are provided in Attachment OW-005-1, Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-2), and Revised Tenas

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		2022. Schedule A (C)3 (a-c)	Proponent’s efforts to engage human populations in culturally appropriate ways, including groups identified by gender, age, race, or other factors considered relevant by the community. b. A description of how the Proponent’s engagement was designed to support the collection of information needed to complete the Gender Based Analysis Plus (GBA+) as described in the EAO’s Human and Community Well-being: Guidelines for Assessing Social, Economic, Cultural and Health Effects in Environmental Assessments in B.C. c. The Project’s impacts on distinct populations, including Indigenous.		Project Environmental Assessment Transition Order: Current and Future Generations Analysis Report (Attachment OW-005-3). Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP (Attachment OW-008-1). Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Project Environmental Assessment Certificate. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-006	100, 102	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C)3 (d-f)	d. A description of how input from Indigenous nations, the public, and local governments was incorporated into the analysis and conclusions set out in the Application about both positive and negative effects and how the proponent's plans for the Project have changed as a result. e. The measures to be taken to address uncertainty in conclusions about effects of the Project on distinct human populations. f. The economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.	To resolve this IR, the Proponent should provide all relevant documentation and commit to further incorporating forthcoming information from engagement with OW and the results from OW studies (WWS, RIA, CUS), to: •Ensure information from Wet'suwet'en was adequately incorporated into the analysis and conclusions set out in the Application about both positive and negative effects and how the Proponent's plans for the Project have changed as a result. •Identify and address uncertainty in conclusions about effects of the Project on distinct human populations. •Accurately identify economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.	Telkwa Mining acknowledges the comment. Please refer to the response to comment ID OW-005.
OW-007	41	Tenas Project Order Under Section 78(7)	4. The Project's effects on current and future generations, including: a.	To resolve this IR, the Proponent should provide all relevant documentation and ensure that: •Wet'suwet'en perspectives and concerns are	Telkwa Mining acknowledges the comment. Please refer to the response to comment ID OW-005.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		dated Dec 16, 2022. Schedule A (C)4	The Project’s positive or negative effects on environmental, economic, social, cultural and health valued components (VCs) and Indigenous interests, as those effects impact both current and future generations. b. A description of how input from the public and Indigenous Nations related to effects on current and future generations was incorporated into the Application and how the Proponent’s plans for the Project has changed as a result. c. Measures that would more equitably distribute positive and negative effects of the Project over time (e.g., across generations). d. A description of how residual effects to VCs and Indigenous interests will affect both current and	integrated into the analysis of impacts to current and future generations; • Adequate and appropriate mitigation measures and responses are in place to address impacts to current and future Wet’suwet’en generations; • Economic benefits from the Project are evenly distributed across generations. Note that this information will also be considered in the RIA being conducted by OW and that this IR will remain open until OW is satisfied with how information from the RIA and OW’s review of TML documents is incorporated into Project monitoring, mitigation, and adaptive management plans.	

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			future generations. e. The type(s) of economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.		
OW-008	NEW	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C) 5	5. A description of how the Project is consistent with any land-use plan of the government or an Indigenous nation.	To accomplish this, OW requires the Proponent to ensure: • That the protocols and directives related to the jurisdiction of the Houses are respected throughout the Yintah; • That this is reflected in the Proponent's Management Plans to OW's satisfaction; • That co-developed rehabilitation plans are identified before proceeding with project if the project is approved.	Telkwa Mining acknowledges the comment and, as requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans. Telkwa Mining has provided the necessary updated management plans that incorporate the Yintah Management Directives for review and comment by OW on their SYNC drive and is included in Attachment OW-008-1. Telkwa Mining has provided the draft reclamation and closure plan to the OW for review, and discussion on any potential improvements is in Attachment OW-008-2.
OW-009	274, 245, 239, 467	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C) 6	6. The Project's greenhouse gas (GHG) emissions, including: a. How the Project's GHG emissions relate to the targets under the BC Climate Change	To resolve this IR, OW requires TML to ensure: • The Project's GHG emissions and impacts on local carbon sinks are in line with Wet'suwet'en priorities; • That proposed mitigation measures and/or	Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020)(Attachment OW-141-1). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project planning and development.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			Accountability Act2. b. The Project's potential positive or negative effects on carbon sinks, including forests.	emissions management plans are effective and account for Wet'suwet'en rights and interests.	In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addressed the outstanding items identified related to GHG, please see Attachment OW-141-3. Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the Rights Impact Assessment, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-010	New	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (D)	d. Information requested from the Proponent by the EAO to better understand potential Project effects: 1. Information Requests: Caribou, issued by the EAO on October 6, 2022. (see Caribou tab)	To resolve these issues, OW requests that TML: •Provide all related documentation, including the updated information requested by OW in our responses to TML's filings related to caribou. (forthcoming). •Consider forthcoming information from OW to determine whether TML has adequately ensured that adverse impacts to caribou are adequately monitored and avoided where possible or, if avoidance is not possible, mitigated and/or managed in a way that is acceptable and appropriate for OW and the Houses.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026, OW-029, OW-030, and OW-031. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information into Project design, monitoring, mitigation, and adaptive management plans.
OW-011	175, 176, 307,350,353, 355, 356, 514	Tenas Project Order Under Section 78(7) dated Dec 16,	2. Information Requests: Water, issued by the EAO on November 23, 2022. (see Water tab)	To address this IR, the Proponent should: • Provide all the information requested in OW's forthcoming responses to TML's IR responses. • Consider forthcoming information from OW	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from Office of the Wet'suwet'en memo, SRK June 2025] Attachment OW-011-1.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		2022. Schedule A (D)		regarding how all concerns related to Project impacts on aquatic resources have been identified and characterized. Consider forthcoming information from OW regarding whether monitoring and mitigation plans are adequate to address adverse impacts to aquatic resources. Impacts to water may also be considered in the RIA being conducted by OW . This IR will remain open until OW is satisfied with how information from the RIA and the outcomes of OW's review of TML documents and engagement with TML on this issue are incorporated into Project monitoring, mitigation, and adaptive management plans.	Please see responses to comment IDs OW-038 through OW-050. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans.
OW-012	New	OW 1. Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (D).3.1	OW Information Requests Through direct engagement with Cas Yex and Kwen Bea Yex House Groups and in collaboration with OW, TML must: Collect cultural data and values specific to Cas Yex and Kwen Bea Yex house territories in the Tenas Project area to collaboratively determine and ground truth the	To resolve this IR, TML should: - Provide all information related to this IR, including any data or material related to engagement, effects assessment, or mitigation measures directly related to the House groups; - Consider and incorporate forthcoming information from OW on cultural impacts, including the findings of Wet'suwet'en studies and engagement outcomes, into the assessment process, project planning, and mitigation development.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			cultural values to be assessed in the review of impacts of the Tenas Project on Wet'suwet'en interests.		
OW-013	New	OW 2. Schedule A (D) 3.2	OW Information Requests Through direct engagement with Cas Yex and Kwen Bea Yex House Groups and in collaboration with OW, TML must: Collect cumulative effects data specific to Cas Yex and Kwen Bea Yex house territories in the Tenas Project area to collect and ground truth data, and to collaboratively determine the methodology for assessing cumulative effects in the review of impacts of the Tenas Project on Wet'suwet'en interests.	To resolve this IR, TML will need to: • Integrate the findings of the RIA and other studies or sources of information provided by OW and the House groups, including the outcomes of engagement with OW and the Houses on this subject into TML's assessment of Project impacts; and • Commit to further engagement aimed at determining whether TML has adequately addressed Project contributions to cumulative effects through impact avoidance, mitigation, and adaptive management.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-014	New	OW 3. Schedule A (D) 3.3	OW Information Requests Through direct engagement with Cas Yex and Kwen Bea Yex House Groups and	To resolve this IR, TML should: • Integrate the findings of the RIA and CUS, other sources of information, and the outcomes of engagement with OW and the Houses on this	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			in collaboration with OW, TML must: collect sociocultural data and values specific to Cas Yex and Kwen Bea Yex house territories in the Tenas Project area to collaboratively determine and ground truth the socio-cultural values to be assessed in the review of impacts of the Tenas Project on Wet'suwet'en interests.	subject into TML's assessment of Project impacts; and • Commit to further engagement aimed at determining whether TML has adequately addressed socio-cultural and wellbeing effects through impact avoidance, mitigation, and adaptive management.	
OW-015	New	Witset FN 1. Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (D) 4.1	Witset Information Requests Through direct engagement with Witset First Nation Members and in collaboration with Witset First Nation Chief and Council, TML must: Collect cultural data and values specific to Witset First Nation in the Tenas Project area to collaboratively determine and ground truth the cultural values to be	To resolve this IR and the associated concerns for Wet'suwet'en, TML should: • Integrate the findings of the RIA, WWS, CUS, other sources of information, and the outcomes of engagement on this subject into TML's assessment of Project impacts; and • Commit to further engagement aimed at collaboratively addressing socio-cultural effects through impact avoidance, mitigation, and adaptive management.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			assessed in the review of impacts of the Tenas Project on Witset First Nation's interests.		
OW-016	New	Witset FN 2. Schedule A (D) 4.2	Witset Information Requests Through direct engagement with Witset First Nation Members and in collaboration with Witset First Nation Chief and Council, TML must: Collect cumulative effects data specific to Witset First Nation in the Tenas Project area to collect and ground truth data, and to collaboratively determine the methodology for assessing cumulative effects in the review of impacts of the Tenas Project on Witset First Nation's interests.	Same as above	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans. Furthermore, Telkwa Mining will discuss appropriate incorporation of result of studies completed by and engagement with Witset First Nation into Project design, monitoring, mitigation, and adaptive management plans.
OW-017	New	Witset FN 3. Schedule A (D) 4.3	Witset Information Requests Through direct engagement	Same as above	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			with Witset First Nation Members and in collaboration with Witset First Nation Chief and Council, TML must: Collect socio-economic data and values specific to Witset First Nation in the Tenas Project area to collaboratively determine and ground truth the socio-economic values to be assessed in the review of impacts of the Tenas Project on Witset First Nation's interests.		design, monitoring, mitigation, and adaptive management plans. Furthermore, Telkwa Mining will discuss appropriate incorporation of result of studies completed by and engagement with Witset First Nation into Project design, monitoring, mitigation, and adaptive management plans.
OW-018	New	Witset FN 4. Schedule A (D) 4.4	Witset Information Requests Through direct engagement with Witset First Nation Members and in collaboration with Witset First Nation Chief and Council, TML must: Commit to sharing all project information with Witset First Nation, including TML's proposed	Same as above	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans. Furthermore, Telkwa Mining will discuss appropriate incorporation of result of studies completed by and engagement with Witset First Nation into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			management, avoidance, mitigation, and accommodation measures based on information provided by Witset throughout the EA and regulatory process.		
OW-019	New	Witset FN 5. Schedule A (D) 4.5	Witset Information Requests Through direct engagement with Witset First Nation Members and in collaboration with Witset First Nation Chief and Council, TML must: Conduct an assessment of Tenas Project impacts on cultural and socio-economic values and cumulative effects specific to Witset First Nation to inform the assessment of impacts on Wet'suwet'en Nation.	Same as above	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans. Furthermore, Telkwa Mining will discuss appropriate incorporation of result of studies completed by and engagement with Witset First Nation into Project design, monitoring, mitigation, and adaptive management plans.
OW-020.1	NEW		Any other outstanding issues with the Application that have been identified by Technical Advisory	OW requires TML to accurately identify and address impacts to the following values: •Moose: Concerns about moose mortality along rail lines and outdated population data. Future survey	Telkwa Mining acknowledges this multi-part request regarding moose, furbearers, and associated wildlife values. The following response is provided in three parts: (1) Moose mortality along rail lines, (2) Moose population data, and (3) Furbearers and other

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			Committee (TAC) reviewers or Indigenous nations.	updates needed, determined by BC Wildlife Biologists. •Other furbearing animals, including Fisher, Marten, Lynx, Coyote, Ermine, Amphibians, Water birds, Bats: Concerns about measures to address habitat connectivity.	identified species. 1) Moose mortality along rail lines The OW previously raised concerns about moose mortality, which were addressed in the Application. During AIR development (May 20, 2020), OW requested CN mortality data and studies from the Moose Mortality Working Group. Telkwa Mining committed to include a moose mortality analysis, reflected in the final AIR. The effects assessment estimates increased collision risk from added railcars and incorporates three Moose Mortality Working Group studies provided by FLNRORD (Heidi Schindler) to the Working Group. Key sections include the following in Attachment OW-020_1-1: • Wildlife chapter: 5.2.5.2, 5.4.5.2, 5.4.5.2.1, 5.4.5.2.3 • Wildlife chapter, Cumulative Effects: 6.3.4.2 2) Moose population data Telkwa Mining used the best available data (1983–2018 survey records) for the effects assessment in the EAC Application (see Attachment OW-020_1-1; Sections 4.2.4.1 and 5.4.5.2.1). Since submission, the Province completed a new moose survey in 2023 with results estimating 5,722 moose (±1,053; 90% CI) in a 13,256 km² study area that included the Tenas Project. This follows the current trend in decreased moose population as reported in the wildlife chapter and this population estimate is consistent with the conclusions provided on moose in the EAC. Telkwa Mining will continue to revisit this aspect as additional population estimates are provided by the province in the future.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Should monitoring from the Project demonstrate potential for adverse interaction between moose and the trains for the Project, Telkwa Mining will recommend additional mitigations to CN such as decreasing the speed of the train near the Project. 3) Furbearing animals, amphibian, water birds and bats, habitat connectivity Species identified by OW were considered during the Valued Component (VC) selection process and development of the Application Information Requirements (AIR). Feedback received during the AIR review led to the inclusion of fisher alongside marten and wolverine in the Furbearers Subcomponent of the Wildlife VC, with species movement assessed to address habitat connectivity. Lynx and coyote were considered but not carried forward due to low potential for adverse interaction, as outlined in the Telkwa VC Scoping Document (Sept 18, 2019). Water birds are included under the Avian VC (Section 4.2.2.2), amphibians are represented by western toad (Sections 5.2.7 and 5.4.7), and bats are included as a subcomponent (Sections 5.2.6 and 5.4.6).
OW-020.2	NEW		Any other outstanding issues with the Application that have been identified by Technical Advisory Committee (TAC) reviewers or Indigenous nations.	OW requires TML to accurately identify and address impacts to the following values: •Culturally important plant species, including those used for food (e.g., huckleberries, blueberries) and medicinal purposes (e.g., Devil's club, stinging nettle). Concerns about missing information on uncommon ecosystems, medicinal/food plants,	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-020_1-1 provides a response related to moose mortality along train lines, habitat connectivity, potential missing information related to plants and wildlife identified by the OW. Telkwa Mining acknowledges the comment. The assessment of culturally important plant species provided in the Tenas Project

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				and rare plant communities essential for Wet'suwet'en foraging, shelter, and sustenance. •Wet'suwet'en culture and rights, including plant use and wellness: Wet'suwet'en to determine if cultural concerns are addressed adequately.	BC EAC Section 4.2.4 in Attachment OW-020_2-1 focused on twelve species used for food and medicine that were identified from previous baseline documents and assessments. The assessment was not intended to include a comprehensive list of culturally important plant species used by the Wet'suwet'en, but looked at a subset of species that could collectively represent effects on culturally important plant species as a group. Telkwa Mining acknowledges that there are many more plant species that are currently, or have previously been, used by the Wet'suwet'en. The Proponent remains committed to continued engagement during Project planning and development to ensure values important to OW and House members are considered through project design, mitigation, and monitoring. As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the Rights Impact Assessment, CUS, and Wellbeing Study (including culturally important plant species, as relevant) into Project design, monitoring, mitigation, and adaptive management plans. The OW is responsible for ensuring that Wet'suwet'en cultural concerns are addressed adequately, if any issues are identified by the Wet'suwet'en peoples on this matter then this needs to be resolved by the OW.
OW-020.3	NEW		Any other outstanding issues with the Application that have been identified by	OW requires TML to accurately identify and address impacts to the following values: •Accidents and malfunctions: Concerns about	Telkwa Mining acknowledges the comment. Please refer to EAO EAC Application, S9.0 Accidents and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			Technical Advisory Committee (TAC) reviewers or Indigenous nations.	potential for environmental damage due to accidents and malfunctions and what additional safeguards are required.	Malfunctions, May 2022, Version 1.0. S9.0, which addresses potential impacts to VCs from reasonable worst-case accidents and malfunctions. Any potential environmental damage is noted for land, air, and water potentially impacting the surrounding environment; this is inclusive of OW impacts. Mitigation measures to safeguard impacts are detailed in each risk assessment scenario described in S9.0 (Attachment OW-020_3-1). Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-021	NEW		"Open" responses from 2023 11 20 - Tenas - WG Issues Tracking Table_10 April 2024. (see ITT Open tab)	N/A - comment only	Telkwa Mining acknowledges the comment.
OW-022	NEW		Tenas Project Information Requests: Fish and Fish Habitat - NEW - Conduct ground-based surveys for spawning activity or evidence of spawning activity of steelhead/rainbow trout, with a focus on smaller	To resolve this IR, TML should: •Provide all documentation and requested information related to fish spawning; •Consider forthcoming information from OW aimed at determining whether TML has adequately identified and characterized all impacts related to Steelhead spawning, including the identification of waterbodies of importance to the Houses; and •Consider forthcoming information from OW aimed	All information has been provided related to fish spawning, fish, and fish habitat to the OW. As requested by the OW, Telkwa Mining will consider forthcoming information on Steelhead spawning habitat from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			creeks that overlap the local study area. The objective is to identify any habitat use in the project area by adult steelhead, including migration and spawning. The spatial extent of surveys should extend from a stream's confluence with the Telkwa River or Goathorn Creek upstream to the end of fish use. Methods to employ can include spawning surveys, redd surveys, fry emergence surveys, DNA, biometrics, habitat suitability assessments, and any other methods deemed appropriate and informative.	at determining whether TML has adequately addressed any adverse impacts to fish spawning in a way that is acceptable and appropriate for OW and the Houses.	Since the information is forthcoming, it will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the development of the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-023	416	Appendix A Sec. 3.1.2, Map 4 pp. 12 Appendix B -	Buffers: Consistent with other recent EA processes, ECCC maintains its recommendation that the effects assessment for sensory disturbance of	A) Please provide an updated Map 4 from Appendix A once the blasting re-assessment (see comments on 491 ITT IR (ECCC, WLRS)) is complete.	Telkwa Mining acknowledges the comment, and notes that the blasting noise assessment is not dependent on the location of the receptor but rather, the location of blasting. Please refer to Attachment OW-023-1 and Attachment OW-023-2. These attachments provide updated isopleth maps of maximum predicted noise levels in relation to the RSA-2 Core Habitat boundary based on Scenario 1, which considers a blasting

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Blasting Noise Assessment	specific mining projects, such as the Tenas Project, should consider an agreed-upon buffer (e.g., of at least 3km). The 500m buffer is appropriate in the context of assessing population-level dynamics at the scale of the herd range, not for assessing project-scale effects of this type. As such, the Proponent is encouraged to re-assess effects to caribou using an appropriate disturbance buffer and may need to re-evaluate the proposed mitigation measures so that they address the potential for effects, considering the larger buffer for sensory disturbance. LWRS agrees with ECCC and notes a more thorough assessment using the project footprint with scientifically defensible		location closest to the RSA-2 Core Habitat boundary at the beginning of mining activity. As illustrated by the figures, the predicted noise level propagation from blasting remains unchanged at a maximum distance of 2km to reach a level of 55 dBa. Please refer to Attachment OW-023-3 and Attachment OW-023-4. These attachments provide updated isopleth maps of maximum predicted noise levels in relation to the RSA-2 Core Habitat boundary based on Scenario 2, which considers blasting at pit floor as mining progresses. As illustrated by the figures, the predicted noise level propagation from blasting remains unchanged at a maximum distance of 2km to reach a level of 55 dBa. The 3 km buffer was based on where blasting would occur for the Project which does not change based on the receptor. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to the noise assessment into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			buffers (e.g., of at least 3 km) and agreed upon by LWRS must be conducted.		
OW-024	420	Appendix A Sec. 3.1.2, Map 4 pp. 12 Appendix B - Blasting Noise Assessment	Buffers: Current proposed disturbance buffering is not sufficient to account for impacts of the Project to caribou use, habitat loss, habitat abandonment or displacement, increased predation risk, and increased stress from permanent, transient, and sensory disturbances. Within the scope of the Project, inactive resource roads should be buffered by at least 500 m, active resource roads should be buffered by at least 1.8 kilometres (km), and active mine sites should be buffered by at least 3+ km, all with appropriate rationale provided for determination of zone-of-influence (ZOI) for each	A) Please provide an updated Map 4 from Appendix A once the blasting re-assessment (see comments on 491 ITT IR (ECCC, WLRS)) is complete.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-023 above.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			activity, disturbance, and status. The above guidelines are the minimum and TCL must work with ECCC and LWRS to develop agreed upon buffers for the additional assessment		
OW-025	NEW	Appendix A Sec. 3.1.2, Map 4 pp. 12 Appendix B - Blasting Noise Assessment	Buffers: Current proposed disturbance buffering is not sufficient to account for impacts of the Project to caribou use, habitat loss, habitat abandonment or displacement, increased predation risk, and increased stress from permanent, transient, and sensory disturbances. Within the scope of the Project, inactive resource roads should be buffered by at least 500 m, active resource roads should be buffered by at least 1.8 kilometres (km), and active mine sites should be	A) Please provide an updated Map 4 from Appendix A once the blasting re-assessment (see comments on 491 ITT IR (ECCC, WLRS)) is complete.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-023 above

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			buffered by at least 3+ km, all with appropriate rationale provided for determination of zone-of-influence (ZOI) for each activity, disturbance, and status. The above guidelines are the minimum and TCL must work with ECCC and LWRS to develop agreed upon buffers for the additional assessment.		
OW-026	418	Appendix A, Section 3.1.1 (PDF p. 14) Map 3 (PDF p. 13) Table 2 (PDF p. 18); Section 3.1.3 (PDF p. 17)	Effects assessment and critical habitat Based on the location of the Project within the Telkwa caribou range, the Application does not provide sufficient rationale to support the determination that the Project and its associated disturbances will result in no direct or indirect habitat loss.	A) Please provide documentation of the additional communications that occurred between TML and ECCC / WLRS that lead to the current definitions that were used by TML in their response to the Information Request, as this is unclear to other parties. B1) Please provide an updated direct and indirect effects assessment that includes impacts to all of the Critical Habitat area (RSA-1), including impacts to moderate and high suitability low elevation winter habitat AND Type 1 matrix habitats. B2) Please provide a clear rationale as to how the direct and indirect effects of the Project will not worsen existing conditions in disturbed areas for	Telkwa Mining acknowledges the comment. A) As mentioned during Telkwa Mining's engagement with OW (January 28, 2025), and in the subsequent written responses to OW's questions (February 19, 2025), Telkwa Mining had not initiated discussions on this (or any) IR response with BC WLRS or ECCC. Telkwa Mining's objective was to first receive feedback from OW, adjust IR responses based on that feedback, and then to present a refined response for all IR topics to BC WLRS and ECCC. Since then, EAO and Telkwa Mining have invited OW and other participating Indigenous nations to all subsequent discussion with BC WLRS and ECCC. B1) Please see Section 5.2.3.3 and Section 5.3 of Appendix 1 (Attachment OW-026-1). Loss of caribou biophysical attributes due to the Project was assessed by estimating the distribution and abundance of currently suitable, or potentially suitable (i.e.,

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			TCL must work with ECCC and LWRS to appropriately characterize the adverse effects of the Project, both direct and indirect, given revised disturbance buffering outlined above, and given the context that the total existing disturbance in the Telkwa herd range already exceeds both federal disturbance thresholds (i.e., minimal disturbance of high elevation winter and/or summer ranges, and at least 65% undisturbed habitat for low elevation winter range and Type 1 matrix categories of critical habitat). Working with ECCC and LWRS will enable mutual understanding of the varying definitions of direct and indirect effects.	the Telkwa Caribou Herd and explain how the loss of potential natural regeneration of disturbed areas <40 years old by 2050 is being accounted for. B3) Please provide an updated version of the direct and indirect effects assessment that includes scenarios where: -The total disturbance is calculated from existing, permanent disturbances in the Critical Habitat area. All burns and cut blocks are assumed to eventually provide habitat and are not included in the total disturbance; and -The Project's total disturbance is added to the existing above disturbance. B4) As Map 3 clearly shows there is moderate and high suitability low elevation habitat in close proximity to the Project footprint and this area will be impacted by indirect effects, please provide a calculation of the area of these habitats that will be indirectly affected regardless of current caribou presence/absence. As well, please provide details of the communications between TML and WLRS that confirms that their concerns related to the use of available telemetry data from the Telkwa Caribou Herd to determine a lack of habitat use have been	capable), low-elevation winter range habitat within the Project Footprint. The previous assessment excluded Type 1 matrix because there is no evidence that those habitats are currently being used by caribou or providing movement habitat to access low-elevation winter range habitat. This could change in future if predator-prey conditions improve; however, this represents a speculative future scenario. While not a standard practice for estimating project effects in an Environmental Assessment context, Telkwa Mining has nevertheless revised their effects assessment to address OW's concerns. The revised effects assessment quantifies the Project's direct and indirect effects on high elevation Core Range, low-elevation Capable Winter Range (i.e., biophysical attributes), and low-elevation Caribou Movement Habitat (Type 1 matrix) under "optimal habitat" baseline conditions. B2) Please see Section 5.3 of Appendix 1 (Attachment OW-026-1). Telkwa Mining's revised effects assessment considers Project effects on all high elevation and low elevation habitats in relation to a revised baseline that now assumes regeneration of all natural (e.g., fire) and forestry (i.e., cutblocks) disturbances, and reclamation of all tertiary and quaternary roads and trails. Certain recreational trails that are unlikely to be reclaimed were retained as permanent disturbances (e.g., Hunter's Basin, Hankin Plateau, Webster Lake, and Star Basin trails). This treatment of non-permanent habitat disturbances maximized the potential effects of the Project and generates an overly conservative effects assessment because it assumes no future

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			TCL must identify adverse effects (loss, alteration, disruption) to each critical habitat type as identified in the Recovery Strategy using the most current critical habitat mapping and using scientifically relevant buffers regardless of current habitat disturbance status. Based on the location of the Project within the Telkwa caribou range, the Application does not provide sufficient rationale to support the determination that the Project and its associated disturbances will result in no direct or indirect habitat loss.	addressed. C) Please provide an updated version of the effects assessment that includes the area of direct and indirect effects within RSA-1 and RSA-2-Core regardless of the current habitat disturbance status.	habitat disturbance other than the Project. Any indirect effects of the Project are considered to result in a complete loss of caribou habitat. This approach, while overly conservative (i.e., sensory disturbance reduces the probability of use but does not remove habitat), accounts for the worsening or additive effects of the Project under the “optimal habitat” baseline conditions scenario. B3) Please refer to the revised effects assessment in Section 5.3 of Appendix 1 (Attachment OW-026-1). B4) Please refer to Section 5.3 of Appendix 1 (Attachment OW-026-1). Indirect effects to moderate and high suitability caribou biophysical attributes (i.e., low-elevation Capable Winter Range as described above) were already calculated in the previous assessment. However, updated calculations of direct and indirect effects to this habitat are provided in the revised effects assessment. As a point of clarification, telemetry data were not used to inform the Project’s direct and indirect effects assessment calculations. Instead, caribou habitat capability was used to inform calculations of direct and indirect effects, even though there is limited evidence of caribou using these areas. As mentioned during the engagement with OW (January 28, 2025), Telkwa Mining had not commenced discussions on this IR

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					response with ECCC and BC WLRS. Telkwa Mining's objective was to first receive feedback from OW, adjust IR responses based on that feedback, and then to present a refined response for all IR topics to BC WLRS and ECCC. Since then, EAO and Telkwa Mining has invited OW and other participating Indigenous Nations to all subsequent discussion with BC WLRS and ECCC. C) Please refer to the revised effects assessment in Section 5.3 of Appendix 1 (Attachment OW-026-1). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to caribou into Project design, monitoring, mitigation, and adaptive management plans.
OW-027	412	Appendix A, Section 3.1.1 (PDF p. 14) Map 3 (PDF p. 13) Table 2 (PDF p. 18); Section 3.1.3 (PDF p. 17)	Effects assessment and critical habitat ECCC recommends that the text in Paragraph 2 be revised to include the following edits: “The Recovery Strategy (Environment Canada 2014) indicates that, for the Northern Group, which includes the Telkwa Caribou Herd, minimal	Please provide details of where ECCC's content edits were actioned by TML.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response. The referenced ITT IR 412 (OW-027) has been removed from the Caribou IR and assigned to the Effects Assessment Phase by the EAO. ITT IR 407 has also been allocated to the Effects Assessment Phase by the EAO.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			disturbance of high elevation winter and/or summer ranges (which is applicable to CRSA2 Core), and at least 65% undisturbed habitat for low elevation winter range and Type 1 matrix range is considered necessary to achieve recovery. The amount of disturbed habitat (using the actual footprint and a 500-m buffer around the existing human disturbance, plus unbuffered natural disturbances [e.g., forest fires]), as defined by the Recovery Strategy (Environment Canada 2014), currently exceeds both of these 35% disturbance thresholds in most Caribou study areas, except for the CRSA2 Core (Table 4.2-4). Note that because the WLSA, CRSA1, and CRSA2 Matrix include		

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			both high- elevation and low elevation areas, these figures underestimate the total percent disturbance for LE only when comparing to the maximum 35% threshold. Regardless, this Low elevation threshold has been exceeded.” Where caribou habitat is below the management thresholds outlined in the Recovery Strategy, as described above, ECCC recommends additional mitigation measures to offset the residual and cumulative effects of the Project on the Telkwa caribou herd. Mitigation measures should be developed: • with appropriate buffers; • using the most current draft of caribou critical habitat mapping; • in consideration of the		

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			high risk to caribou given previous impacts to the landscape and the small population size of the Telkwa herd; and • following the mitigation hierarchy of avoid, reduce, and compensate/ offset. ECCC recommends that offsetting mitigation measures follow the guidance outlined in the Operational Framework for the Use of Conservation Allowances. Reference Environment Canada. 2012. Operational Framework for Use of Conservation Allowances. Environment Canada, Ottawa, ON. 13pp. Available at: https://publications.gc.ca/collections/collection_2012/ec/En14-77-2012-eng.pdf		

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-028	NEW	Appendix A (General)	Effects assessment and critical habitat TCL must work with ECCC and LWRS to appropriately characterize the adverse effects of the Project, both direct and indirect, given revised disturbance buffering outlined above, and given the context that the total existing disturbance in the Telkwa herd range already exceeds both federal disturbance thresholds (i.e., minimal disturbance of high elevation winter and/or summer ranges, and at least 65% undisturbed habitat for low elevation winter range and Type 1 matrix categories of critical habitat). Working with ECCC and LWRS will enable mutual understanding of the varying definitions of direct and indirect effects.	Please provide documentation of the additional communications that occurred between TML and ECCC / WLRS that lead to the current characterization of the adverse effects of the Project that was used by TML in their response to the Information Request, as this is unclear to other parties.	Telkwa Mining acknowledges the comment. As mentioned during Telkwa Mining’s engagement with the OW (January 28, 2025), and the subsequent written responses to the OW’s questions (February 19, 2025), Telkwa Mining has not initiated discussions on this (or any) IR response with BC WLRS or ECCC. Telkwa Mining’s objective is to first receive feedback from OW, adjust IR responses based on that feedback, then present a refined response for all IR topics to BC WLRS and ECCC. Telkwa Mining will invite OW and other participating nations to all subsequent discussion with BC WLRS and ECCC. Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			TCL must identify adverse effects (loss, alteration, disruption) to each critical habitat type as identified in the Recovery Strategy using the most current critical habitat mapping and using scientifically relevant buffers regardless of current habitat disturbance status.		
OW-029	NEW	Appendix A (General); Appendix C (General); Appendix A (Section 4.7 PDF p. 34-35)	Offsetting for direct and indirect effects TCL must work with ECCC and LWRS to develop an adequate assessment following the mitigation hierarchy, including appropriate mitigation and offsetting measures (e.g., securement, habitat restoration) at agreed upon ratios 1 2. Multiple ratios may apply depending on the specifics of the impacted and offset habitat types and locations.	A) Please provide documentation of the additional communications that occurred between TML and ECCC / WLRS that led to the current offsetting activities proposed by TML in their response to the Information Request, as this is unclear to other parties. B) Please provide an updated direct and indirect effects assessment based on the above comments and an updated estimate of required offset areas based on this revised effects assessment. C1) Please provide a clear commitment to offset Project related direct and indirect effects on Telkwa caribou herd habitat based on a revised Project effects assessment (see above comments). C2) Please provide further details of the field-based assessments noted in Appendix C, including but	Telkwa Mining acknowledges the comment. A) As mentioned during Telkwa Mining's engagement with OW (January 28, 2025), and in the subsequent written responses to OW's questions (February 19, 2025), Telkwa Mining had not initiated discussions on this (or any) IR response with BC WLRS or ECCC. Telkwa Mining's objective was to first receive feedback from OW, adjust IR responses based on that feedback, and then to present a refined response for all IR topics to BC WLRS and ECCC. Since then, EAO and Telkwa Mining have invited OW and other participating Indigenous Nations to all subsequent discussion with BC WLRS and ECCC. B) Please refer to the revised effects assessment in Section 5.3 of Appendix 1 (Attachment OW-026-1). C) Please see responses to C1 through C3, below.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			Mitigation measures should be developed with scientifically defensible buffers using the most current draft of caribou critical habitat mapping, while considering the high risk to caribou given previous impacts to the landscape and the small population size of the Telkwa caribou herd, and follow the mitigation hierarchy of avoid, reduce, and compensate/offset. Offsets must be designed to deliver tangible, measurable, on-the-ground conservation outcomes for caribou that are clearly linked to the impacts predicted to remain after all other mitigation measures are applied, and result in net increase of caribou habitat, at agreed upon	not limited to: - The spatial extent of on the ground survey activities at each location; - The methods used to confirm / discount PEM / TEM mapping; and -The spatial extent of each PEM / TEM mapping polygon in which surveying was conducted. C3) Please commit to undertaking further assessments of PEM / TEM mapping, inclusive of areas not identified as moderate or high suitability habitat to confirm its absence of these features, to better understand where moderate/high suitability caribou habitat may actually be present or absent. TML should undertake further discussions with ECCC, WLRS, and Wet'suwet'en to 1) ensure that the proposed scale, extent, timing, and methods of this survey are appropriate and 2) discuss other opportunities for habitat offsetting in areas without advanced regeneration D) Please undertake further discussions with TML, ECCC, WLRS, and Wet'suwet'en to determine offsetting ratios that will be required for the Project. To inform these discussions, TML should provide further rationale and summary of possible offsetting ratios that could be used to offset Project effects. Given the current low population levels and highly disturbed landscape that the Telkwa caribou herd occupy, any further disturbance could have	Based on the work completed in September 2024, over 90% of the identified high elevation restoration offset targets were reviewed at a reconnaissance level and determined that undertaking restoration activities may cause more disturbance than allowing natural regeneration to occur on its own. Telkwa Mining reviewed the remaining 10% of high-elevation restoration candidates, with the participation of OW, during August 2025 fieldwork. The candidates surveyed in August 2025 were used to inform offsetting calculations. Further details are provided in Section 6.5 of Appendix 1 (Attachment OW-026-1). C1) Please refer to the revised effects assessment and habitat offsetting strategy in Section 5.3 and Section 6 of Appendix 1 (Attachment OW-026-1). Telkwa Mining is committed to offset Project-related direct and indirect effects on caribou habitat based on either item (B), above, or a table of effects that has been approved by regulatory bodies for the Tenas Project. C2) Please refer to Section 5.2.3.3 and Section 6.5 of Appendix 1 (Attachment OW-026-1). In addition to reconnaissance-level assessment of moderate/high suitability low elevation caribou habitat (September 2024), 66 (5.65-m radius) plots were assessed for site series and caribou habitat suitability and capability in the Project Footprint (August 2025). Based on these field observations, no adjustments were made to the TEM/PEM-

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			ratios. The temporal lag of measures needs to be clearly represented in the assessment of conservation outcomes.	increasingly dire consequences for the herd's continued existence and the proposed offsetting ratios must reflect this context. E) Please commit to providing all offsetting funds at the start of the Project, to ensure that the maximum effectiveness and benefit of offsetting activities on the Telkwa caribou herd are realized.	defined low-elevation capable winter range habitat. Recall from the Vegetation and Ecosystems Baseline Report (Appendix 4.7-A in the Project Application; Ardea Biological Consulting 2022) that the TEM occurred within the Vegetation Local Study Area (LSA; Project Footprint + 250–500 m buffer) and PEM mapping occurred in the Vegetation Regional Study Area (RSA; Project Footprint + 5 km buffer) and beyond, including the broader RSA-1 (Telkwa Caribou Herd Critical Habitat boundary). As part of the development of the TEM, 780 ecosystem plots were investigated from 1997–2019 and were used to characterize vegetation and ecosystem types (Table 3.2-2 in Appendix 4.7-A). At the mine site, 445 plots were completed; 371 of these plots were completed from 2017–2019. A detailed mapping accuracy assessment was completed for TEM polygons using the methods outlined in (Meidinger 2003). For more details related to the PEM/TEM, please refer to Appendix 4.7-A in the Project Application. C3) Telkwa Mining considers the TEM developed for the Project Footprint to be robust and adequately verified based on the extensive plot work and subsequent accuracy assessment. Telkwa Mining has no intention of conducting additional work to confirm the PEM outside the Project Footprint because this would have no impact on the Project effects assessment, and detailed ground reconnaissance would be a component of any habitat restoration projects considered in these areas.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Please refer to Section 5.2.3.3 of Appendix 1 (Attachment OW-026-1). Telkwa Mining completed field assessments, with the participation of an OW representative, of TEM/PEM-derived low-elevation capable winter range habitat and evidence of caribou use within the Project Footprint in August 2025. The fieldwork validated the use of the TEM/PEM approach, and identified limited evidence of caribou use within the Project Footprint. D) The offset ratios provided are Telkwa Mining’s suggestions and are intended for discussion. The final offset ratios for high elevation (core) and low elevation (caribou biophysical and Type 1 matrix) caribou habitat will depend on input from BC WLRS, ECCC, OW, and Wet’suwet’en house groups. Please also refer to the revised habitat offsetting strategy for updated offset ratios and corresponding rationales; see Section 6 of Appendix 1 (Attachment OW-026-1). E) Telkwa Mining will commit to a higher percentage of offsetting funds to be available at the start of the Project, however, some funds need to remain to conduct annual inspections, monitoring, and reporting activities by various groups. If need be, this annual amount can be over and above the offset amount calculated. Please also refer to the revised habitat offsetting strategy for updated offset ratios and the disbursement of funds; see Section 6 of Appendix 1 (Attachment OW-026-1). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the Rights Impact Assessment,

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-030	412		Offsetting for direct and indirect effects ECCC advises that SMC critical habitat is likely to be destroyed by the Project. In the event the Project is approved, ECCC's view is that mitigation measures, including offsetting, should be provided to address the Project's contribution to cumulative effects on the Telkwa herd. Offsetting provided should be commensurate with the risk to the Telkwa herd and its critical habitat, including the consideration of the low population number, and that the management thresholds for caribou critical habitat have already been exceeded. In addition, ECCC notes the	Please provide details of where ECCC's content edits were actioned by TML.	Telkwa Mining acknowledges the comment. Please see responses related to habitat offsetting in previous sections. Please also refer to the revised habitat offsetting strategy in Section 6 of Appendix 1 (Attachment OW-026-1). ITT IR 407 and red text in ITT IR 412 have been moved to the Effects Assessment stage by the BC EAO. Telkwa Mining suggests that OW discuss this item with the BC EAO and the technical working group. Note: there are several duplicated IR numbers (including IR 412) in the tracking table provided by BC EAO, which may be causing confusion. As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to caribou on Indigenous interests or Indigenous Nations into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			recommended edits are intended to correct inaccuracies in TCL's text (i.e., the 35% disturbance threshold does not apply to high elevation range). The ECCC review thoroughly lists the gaps and expectations. TCL did not adequately consider the comment from ECCC. The clarification on the issue of habitat type requires re-evaluation of the project impacts and subsequent assessment of adverse effects. LWRS comment on 407 also needs to be considered here.		
OW-031	417		Offsetting for direct and indirect effects TCL must work with ECCC and LWRS to develop an adequate assessment following the mitigation hierarchy, including	(See above comment regarding offsetting.)	Telkwa Mining acknowledges the comment. Please see responses related to habitat offsetting in previous sections. Please also refer to the revised habitat offsetting strategy in Section 6 of Appendix 1 (Attachment OW-026-1).

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			appropriate mitigation and offsetting measures (e.g., securement, habitat restoration) at agreed upon ratios. Multiple ratios may apply depending on the specifics of the impacted and offset habitat types and locations. LWRS agrees with ECCC comments and recommends the Proponent review the Environmental Mitigation Policy and provide an offsetting plan. Offsets must: 1) be designed to deliver tangible, measurable, on-the-ground conservation outcomes for caribou that are clearly linked to the impacts predicted to remain after all other mitigation measures are applied. 2) Result in no net loss of caribou habitat. ECCC advises that SMC		

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			critical habitat is likely to be destroyed by the Project. In the event the Project is approved, ECCC's view is that mitigation measures, including offsetting, should be provided to address the Project's contribution to cumulative effects on the Telkwa herd. Offsetting provided should be commensurate with the risk to the Telkwa herd and its critical habitat, including the consideration of the low population numbers and that the management thresholds for caribou critical habitat have already been exceeded.		
OW-032	491	Appendix B - Blasting Noise Assessment	Acoustic modeling and impacts (assessment of indirect effects) The current model is overly simplistic given values in the receiving environments. TCL must conduct acoustic	A) Please provide an updated Blasting Noise Assessment using: 1. The closest areas of BC's 2019 RSA-2-Core habitat as the discrete receptors and; 2. Modelled blasting sites chosen based on the closest potential location to the RSA-2-Core habitat.	Telkwa Mining acknowledges the comment. A) Please see Appendix A in Attachment OW-032-1. The attachments provide updated isopleth maps of maximum predicted noise levels in relation to the RSA-2 Core Habitat boundary based on Scenario 1, which considers a blasting location closest to the RSA-2 Core Habitat boundary at the beginning of mining activity. Attachment OW-032-1 also provides updated isopleth maps of maximum predicted noise levels in

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			modeling that considers terrain and atmospheric conditions to accurately assess the effects of blasting associated with pit development on caribou. This includes residential areas as well as caribou core habitat.	B) Please provide the following information regarding noise level exceedances: 1. Daytime noise levels: exceedance level at 2 km away, exceedance level at 1 km away, exceedance level at the edge of the Project footprint, and how often these levels will be exceeded (hourly, daily, weekly, etc.). Please provide all this information in table format. 2. Maximum noise levels: dB heard at closest edge of RSA-2-Core habitat, exceedance level at 2 km away, exceedance level at 1 km away, exceedance level at the edge of the project footprint, and how often these levels will be exceeded (hourly, daily, weekly, etc.). Please provide all this information in table format. 3. Nighttime noise levels: exceedance level at 2 km away, exceedance level at 1 km away, exceedance level at the edge of the project footprint, and how often these levels will be exceeded (hourly, daily, weekly, etc.). Please provide all this information in table format. C) Please incorporate the lower auditory threshold for caribou of 30 Hz into the Blasting Noise Assessment.	relation to the RSA-2 Core Habitat boundary based on Scenario 2, which considers blasting at pit floor as mining progresses. As illustrated by the figures, the maximum noise levels may exceed the target daytime noise level of 55 dBA and the caribou auditory threshold of 30 dBA up to 2 km from the blast initiation site. Responses to B1, 2B2, 2B3 and 3C are provided in Appendix A in Attachment OW-032-1. 2.B) 1. Daytime noise levels (55 dBA) and caribou auditory thresholds (30 dBA) are only exceeded up to 2 km away from the Project footprint. Daytime noise levels (55 dBA) and caribou auditory thresholds (30 dBA) are exceeded at the edge of the Project footprint. This is related to equipment operation during the Operation Phase, which could occur continuously. 2. B) 2. Maximum A-weighted noise levels are not predicted to exceed the target level of 55 dBA at 2 km away. Maximum A-weighted noise levels are predicted to exceed the target level of 55 dBA at the edge of the Project footprint and at 1 km away, encompassing a small area within the RSA-2 Core Habitat boundary. This is related to blasting, both at the upper benches of pit development, and as mining progresses, and could occur once a day throughout the Operation Phase, for a duration of approximately five minutes while the blast is detonated. Maximum linear-weighted noise levels are not predicted to exceed the target level of 120 dB within the RSA-2 Core Habitat boundary, 1 km away, or 2 km away. Maximum linear-weighted

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					noise levels are predicted to exceed the target level of 120 dB at the edge of the Project footprint, only when blasting at the upper benches of pit development, which could occur once a day at the beginning of the Operation Phase, for a duration of approximately five minutes while the blast is detonated. Blasting will be conducted in accordance with the Tenas YMD-Enhanced Explosives Management Plan (Provided in Attachment OW-008-1) in which Telkwa Mining has committed to waiting for large animals such as caribou to be clear of 700 m prior to blasting. 2. B) 3. Nighttime noise levels are not predicted to exceed the target level of 45 dBA at 2 km away. Nighttime noise levels are predicted to exceed the target level of 45 dBA at the edge of the Project footprint and only minimally (45.3 versus 45) at 1 km away. This is related to equipment operation during the Operation Phase, which could occur continuously. C) Blasting noise was modelled for the octave band with midband frequency of 31.5 Hz as this represents the lowest octave band considered by the CadnaA model and the ISO 9613-2 algorithms. This octave band includes frequencies from 22 Hz to 44 Hz, encompassing the 30 Hz threshold. Noise levels associated with 30 Hz would not be measurably different from modelled noise levels associated with the octave band with midband frequency of 31.5 Hz. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					the noise assessment to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-033	492	Appendix D - Information Requirement Response — Impact of Upgraded Recreational Access on the Telkwa Mountain Caribou Subpopulation	Recreational Access Construction of the bridge over Tenas Creek has significant potential to increase recreational access to the Telkwa mountains resulting in displacement of caribou from core habitat. This issue was pointed out to the proponent and discussed in pre-application meetings; however, I do not see mention of it in the application. EA Information Requirement: Include a description of increased access to the Telkwa mountains resulting from mine development, recommend mitigation and assess impacts to Telkwa Caribou Herd.	A) Please provide the following information regarding the Goathorn Creek Bridge: - Hours that the bridge's gates will be locked. If gates are not locked 24/7, how does the Proponent propose to restrict access? - How recreational users will contact TML personnel to receive an escort and educational engagement. - What hours these services will be available, and if recreational users will be able to cross the bridge if no TML staff are available to provide an escort/education. B1) Please meaningfully consider existing and forthcoming information from Wet'suwet'en to accurately identify impacts to caribou and develop effective, culturally appropriate mitigation measures to address those impacts; B2) Please meaningfully consider existing and forthcoming information from Wet'suwet'en to determine how to collect and/or share data on public use with OW, and determine whether (and what) further mitigations may be required as data is collected overtime; B2) A commitment to engage with OW prior the	Telkwa Mining acknowledges the comment. A) 1.The bridge gates will be electronically locked 24/7 hence the requirement for escorts. Furthermore, cameras will be positioned at gate locations to observe interactions at these locations and detect if people are accessing the property without following appropriate access protocols. 2.) As provided in section 6.5.3 Users are to contact Telkwa Mining for an escort through one or all of the following ways A) telephone, B) Web portal as part of the mine website C) In person at the Telkwa Mining Office D) email info@telkwa-mining.ca 3.) As provided in section 6.5.3 of the PAMP, recreational users will not be able to cross the bridge if no Telkwa Mining staff are present to provide an escort unless they were to ignore signage and disable the gate. A draft schedule is provided below which can be amended as required. Summer Schedule - High Season: between Canada Day and Labor Day long weekends: seven (7) days a week; inbound to Parking Area 1 every four (4) hours starting at 8:30 a.m. and ending at 20:30 p.m.; outbound from the Parking Area 2 every four (4) hours starting at 13:00 p.m. and ending at 21:00 pm.; and by request by using the company

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				Effects Assessment phase to determine how to collect and/or share data on public use with OW, and determine whether (and what) further measures regarding access may be required as data is collected overtime; C) Please commit to providing Wet'suwet'en the opportunity to co-develop educational material that will be given to users of recreational areas in caribou habitat. Engagement must ensure Wet'suwet'en perspectives and objectives are adequately integrated into the material. D) The Proponent must develop an access plan with Wet'suwet'en members to ensure members' right to enjoy and exist peacefully on the land is upheld.	website, email, sign-in sheet in Telkwa, and/o telephone at least 72 hours prior to access being required. Summer Schedule - Low Season: between Victoria Day and Canada Day long weekends and between Labour Day and Thanksgiving Day long weekends: weekends including Friday only; inbound to Parking Area 1 every four (4) hours starting at 8:30 a.m. and ending at 20:30 p.m.; outbound from the Parking Area 1 every four (4) hours starting at 13:00 p.m. and ending at 21:00 pm.; and by request only using the company website, email, office, sign-in sheet in Telkwa, and/or telephone at least 72 hours prior to access being required. Winter Schedule: between Thanksgiving Day long weekend in October and Victoria Day long weekend in May of the following year: no service between December 20 and January 5 without prior arrangement; weekends not including Friday; inbound to Parking Area 1 at 9:30 a.m. and at 13:30 p.m. and 17:30 p.m.; outbound from Parking Area 1 at 13:00 p.m. and at 17:00 p.m.; and by request only using the company website, email, sign-in sheet in Telkwa, and/or telephone at least 72 hours prior to access being required reflecting the times below. Furthermore, for any special events and/or other access requirements, arrangements can be made with Telkwa Mining for facilitating access. 3. B1) When this information is provided by the OW this will be

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					incorporated into the Tenas YMD-Enhanced Caribou Monitoring and Management Plan and the YMD-Enhanced PAMP. B2) Telkwa Mining commits to engage with the OW prior to the Project commencing construction on how to collect an share data on public use with the OW and determine when and what further measures regarding access may be required as data is collected overtime. The current plan will have a sign in sheet or system that non Telkwa Mining employees and contractors entering and exiting will be required fill out, which will also verify information on the number of people, vehicles, duration, expected activities and location of these activities. This information will be requested when reserving a spot for escort and the system will not allow a successful booking unless the information is provided. This information will be available monthly to the OW and other groups so they can see when people came and went from site. C) Telkwa Mining commits to providing Wet'suwet'en the opportunity to co-develop educational material that will be given to users of recreational areas in caribou habitat and that the engagement will ensure Wet'suwet'en perspectives and objectives are integrated into the material. This could be a condition of permit documents. Telkwa Mining envisions this to be a video presentation with an exam which can be completed as part of the reservation system with people needed to complete this review and score a minimum of 80% on the exam prior to a booking being allowed by the system. For users who just show

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					up they will be required to go through the same process in Telkwa Mining's office in Telkwa. D) As stated in Section 6.3 below of the PAMP, Telkwa Mining is committed to amending the YMD-Enhanced PAMP with Wet'suwet'en members to ensure members' right to enjoy and exist peacefully on the land is upheld. This engagement will occur once OW provides input on which members, how many and a suggested engagement strategy to accomplish this adequately. Currently there is no bridge to enable users to access areas west of Goathorn Creek. Users ford (drive through) Goathorn Creek. Telkwa Mining installing a controlled bridge access does not change the current use. Users will still be able to ford the Goathorn Creek outside of the Project Footprint. Telkwa Mining will work with the OW, Witset First Nation, Skin Tyee First Nation and Wet'suwet'en First Nation to develop procedures that meet their requests. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to access to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-034	492	Appendix D - Information Requirement Response — Impact of	Recreational Access LWRS acknowledges TCL response and requires more information. The Public Access Management	(See comment above.)	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-033.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Upgraded Recreational Access on the Telkwa Mountain Caribou Subpopulation	Plan does not include any mention of an educational component about caribou use or mitigation strategies. Rather, the plan highlights new access routes for "a broad range of transport, including horse, walking, biking, snowmobiles, quads, side by sides, motorbikes, and motorized vehicles". The plan should clearly state how new access roads will impact the Telkwa caribou herd and propose mitigation strategies.		
OW-035	NEW	2023-07-04 EAO - ORDER AMENDING SECTION 11 ORDER UNDER THE FORMER ACT AND SECTION 78(7) ORDER UNDER THE ACT Section D of	Fish and Fish Habitat Telkwa Coal Limited must conduct ground-based surveys for spawning activity or evidence of spawning activity of steelhead/rainbow trout, with a focus on smaller creeks that overlap the local study area. The	The value of Tenas Creek and Goathorn Creek as critical steelhead spawning habitat is unclear. TML must identify critical steelhead spawning habitat before the potential risks of the Project to steelhead can be determined, as per the Information Requests sent by the BC EAO on June 6, 2023.	The 2023 Spring Spawner Survey (Palmer 2024a, Attachment OW-022-1) was conducted in accordance with accepted field standards and practices for fish habitat assessments in British Columbia. The Steelhead spawning period, however, coincides with the spring freshet, during which environmental conditions such as elevated water levels and high turbidity can reduce visibility. These conditions can result in the non-detection of fish and/or spawning habitat, even when the surveys are carried out in full compliance with provincial standards. Furthermore, in some cases, freshet conditions make sites unsafe to access, and therefore data is not able to be collected.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Schedule A of the Transition Order: Tenas Project Information Requests: Fish and Fish Habitat June 6, 2023, Fish and Fish Habitat 3.3.2 Spring Spawning Survey "Suitable steelhead spawning habitat was not observed during the Spring Spawner Survey at any site, with the exception to WQS13 (Goathorn)."	objective is to identify any habitat use in the project area by adult steelhead, including migration and spawning. The spatial extent of surveys should extend from a stream's confluence with the Telkwa River or Goathorn Creek upstream to the end of fish use. Methods to employ can include spawning surveys, redd surveys, fry emergence surveys, DNA, biometrics, habitat suitability assessments, and any other methods deemed appropriate and informative.		The absence of observed Steelhead or high-quality spawning habitat during the Spring Spawner Survey does not indicate a change in habitat; instead, it highlights the inherent limitations of conducting surveys during periods of challenging environmental conditions. It is possible that steelhead spawning habitat exists in Goathorn Creek and Tenas Creek downstream from the Project. There are no barriers preventing fish, including steelhead, from accessing these creeks. While spawning habitat may have been recently assessed as poor in areas previously identified as suitable in the baseline study, this does not rule out the presence of spawning habitat elsewhere in the creeks, nor does it mean that steelhead are unable to spawn there. Telkwa Mining will continue to monitor and study the likelihood of steelhead spawning habitat existing within the entire portions of both Goathorn and Tenas Creeks that are downstream from the Project. It is expected that this monitoring and any additional surveys will be conditions of the EAC. To address the OW's comment regarding the current use of Goathorn Creek, Four Creek, Tenas Creek, and Helps Creek by Steelhead, abundance surveys will be completed in 2025. This program is comprised of one representative site per reach in each creek and will utilize three-pass depletion electrofishing to calculate abundance estimates of key species. Telkwa Mining will also conduct additional habitat surveys to identify and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					quantify any critical spawning habitat within Goathorn Creek, Four Creek, Tenas Creek, and Helps Creek in 2025. The habitat assessments will use Fish Habitat Assessment Procedure (FHAP) surveys focused on areas which could support fish spawning. Since 2022, new data has been added to the Water Model to the end of 2024. The updated models predict no Project-related exceedances of the chronic BC water quality guidelines for the protection of aquatic life, including steelhead and rainbow trout, besides those parameters in baseline monitoring that are naturally exceeding these same guidelines. As requested by the OW, Telkwa Mining will discuss with OW and the regulators on the appropriate incorporation of the results of these studies regarding Steelhead to Indigenous interests or Indigenous nations into further Project design, monitoring, mitigation, and adaptive management plans. This may occur during Project Development processes and/or be incorporated as appropriate in the development of the operational management plans. The management plans that will be in place for the Project will have measures to adapt the details of the management plans to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies or from ongoing monitoring.
OW-036	NEW	2023-07-04 EAO - ORDER AMENDING	Fish and Fish Habitat Telkwa Coal Limited must conduct ground-based	As inappropriate analyses were used to characterize the life histories of O. mykiss in the Project Area, the Proponent's assertion that they are on average resident rainbow trout is not	The concerns regarding the morphometric analysis presented in Palmer (2024a, Enclosure 1: Attachment OW-022-2) to characterize the life histories of Rainbow Trout (Oncorhynchus mykiss) within the Project area are acknowledged. To clarify, the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		SECTION 11 ORDER UNDER THE FORMER ACT AND SECTION 78(7) ORDER UNDER THE ACT Section D of Schedule A of the Transition Order: Tenas Project Information Requests: Fish and Fish Habitat June 6, 2023, Fish and Fish Habitat Section 3.5 Morphometric Analysis	surveys for spawning activity or evidence of spawning activity of steelhead/rainbow trout, with a focus on smaller creeks that overlap the local study area. The objective is to identify any habitat use in the project area by adult steelhead, including migration and spawning. The spatial extent of surveys should extend from a stream's confluence with the Telkwa River or Goathorn Creek upstream to the end of fish use. Methods to employ can include spawning surveys, redd surveys, fry emergence surveys, DNA, biometrics, habitat suitability assessments, and any other methods deemed appropriate and informative.	supported. The Proponent has not meaningfully addressed the IR and the issue of a lack of knowledge of the extent and value of the streams as critical spawning habitat for steelhead remains outstanding. TML must use an appropriate analysis to characterize the life histories of Oncorhynchus mykiss in the Project Area.	technical report does not assert the absence of either resident Rainbow Trout or migratory Steelhead life history types in Goathorn Creek or Tenas Creek. Rather, the analysis was presented as a supplementary approach to provide further insight into potential Steelhead presence, particularly given that the 2024 Spring Spawner Survey was constrained by site conditions. It is agreed that Steelhead spawning is possible within Goathorn Creek and Tenas Creek because there are no known barriers to fish movement between these systems and the Telkwa River. Additional habitat surveys that focus on identifying key Steelhead and Rainbow Trout spawning habitat features will be conducted in 2025. The objective of these surveys is to identify areas of potential spawning habitat within Goathorn Creek and Tenas Creek. As requested by the OW, Telkwa Mining will consider any forthcoming information on Steelhead and fish spawning habitat including impacts from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans. This information will be considered in subsequent Project Development processes incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-037	307	page 1-2 in Appendix M; Table 2-4 in TML Water Quality IR Response	Surface Water Quality Consider the impacts of exceeded BC water quality guidelines (WQGs), particularly to aquatic biota and resident fish populations, at a local scale rather than regional scale.	OW Recommendation The Local Study Areas (LSA) were delineated to capture all potential direct effects (e.g., erosion, off-site siltation, dilution zones from pipes or groundwater) and indirect effects of limited spatial extent (e.g., edge effects), and the Regional Study Area (RSA) was delineated to capture all direct and indirect Project affects that could affect a VC. While the Proponent argues that "the use of a LSA precludes consideration of all potential adverse effects, and would artificially and inappropriately inflate the magnitude considered in the characterization", these local effects are ALSO important to characterize as they represent impacts at local scale that contribute to cumulative effects at the RSA. The LSA also describes the immediate impacts of the Project area, which are not irrelevant as that area of impact is an ecosystem of value being affected by the Project, even if at the larger scale the local impacts are diluted. The fact that the Proponent refuses to also do an assessment at the LSA likely indicates that impacts to the VC at the LSA are larger than they would like to communicate, because they are	Telkwa Mining acknowledges the comment. Please refer to Attachment 307-1 (OW-037-1) that provides a rationale on why the RSA was used versus using the LSA as suggested which is based on precedent from other completed EA studies. The Environmental Assessment Certificate Application for the Tenas Project (May 2022) evaluated the effects on surface water quality at both the Local Study Area (LSA) and the Regional Study Area (RSA) levels, with the ultimate significance determination being made at the RSA level. This approach is consistent with guidance from the British Columbia Environmental Assessment Office (BC EAO) and is considered appropriate when cumulative effects are possible, downstream receptors could be affected, and to establish context for baseline variability. This approach results in a more complete understanding of potential effects. Since 2022, new data has been added to the Water Model to the end of 2024. The updated models predict no Project-related exceedances of the chronic BC water quality guidelines for the protection of aquatic life except for those parameters in baseline monitoring that are naturally exceeding these same guidelines downstream from the Project outside of the initial dilution zone for either the RSA or LSA. Based on this information it is not expected that Project will have significant adverse effect on the water VC.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				reduced at the RSA. In addition, based on the updated modeling results for the EAC Project Case (Table 2-4 in TML Water Quality IR Response), there are still exceedances of BC WQG in Four Creek and Tenas Creek (Appendix I_Memo_MitigationMeasures), so the rationale behind claims that there are no exceedances even with the new proposed mitigation measures is unclear. TML must assess the impacts of exceeded BC water quality guidelines (WQGs) in the LSA in addition to the RSA.	It should be noted that significance of adverse effects on surface water quality would remain as “Not Significant” even if the magnitude of the effect on water quality were changed to "High" to align with the higher affected percentage in the LSA (14%) in comparison to the RSA (2%). The assessment methodology defines a significant effect as one that is of High Magnitude, has a Regional or greater extent, and is Long-term in duration. As the effects on water quality are confined to the Local Study Area (LSA), they do not meet the required "Regional" geographic extent criterion. Because all three specific conditions are not met, the effect would still be classified as "Not Significant". In addition, Attachment 307-1 (OW-037-1) provides a rationale for why the RSA was used versus using the LSA, and provides examples of this methodology from other completed EA studies. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-038	350 and 351	Section 3, Section 4	Water Mitigation Measures and Treatment Options 1. Provide additional mitigation measures to address the significant exceedance of WQGs in	The Proponent provides viable options for reducing concentrations of selenium, sulfate, cadmium, and nitrate/nitrite including a combination of multiple treatments. In some cases (Table 9), exceedances still occur (e.g., selenium, nitrate) at the end of	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from Office of the Wet'suwet'en memo, SRK June 2025] Attachment OW-011-1. This IR response was divided in two parts, addressing first the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			frequency and duration for selenium, nitrite, sulphate and dissolved cadmium in Four Creek and Tenas Creek.	pipe, even when multiple treatments are applied, particularly from the Tenas Control Pond. While the right combination of mitigation treatments will definitely improve downstream water quality, there are impacts to local streamflow and in some cases other constituents (e.g., increases in selenium). The most concerning reductions in streamflow for both Tenas and Four Creek are during late summer months (August) and winter baseflows. It doesn't appear that these reductions in streamflow have been modelled within the Water Load Balance Model to predict how the lower flows will impact downstream WQ at prediction nodes, although reduced concentrations in surface and groundwater should help, reduced water flow could end up balancing that reduction and total constituent loading may ultimately not change much. This warrants further investigation. To resolve these issues, TML must: • Provide more information on how the reduction of water flow in the Tenas and Four Creek is involved in mitigations for reducing concentrations of selenium, sulfate, cadmium, and nitrate/nitrite; • Provide data for how this reduction is incorporated into the Water Load Balance Model to predict how the lower flows will impact water quality downstream, especially during late summer	request for more information on how the reduction of flows in Tenas and Four Creeks is accounted for in the model, then providing more information on the mitigation measures and best management practices considered in the Best Achievable Technology Assessment. Additional Information about Reduction of Flows in Tenas and Four Creeks SRK has completed an extensive update to the Water and Load Balance Model since 2022 which is provided in Attachment OW-038-1 (SRK 2025b). These changes were summarized in the introduction of this document. SRK has also completed two technical evaluations of proposed water mitigations, including the reliability and risks associated with effective treatment, in addition to the expected beneficial change in 2024-2025. These are described in the following two reports: 1) Effect of Mitigation Controls on Water Quality and Quantity of the Tenas Project (Attachment OW-038-2, SRK 2025c), which is an updated version of the memo that described the effect of mitigations (from May 2022). The updated memo includes the changes made to the Water and Load Balance Model between 2022 and 2024 (as described in the updated Water and Load Balance Model report 2025 [Attachment OW-038-1]), and 2) Tenas Project – Best Achievable Technology Assessment Report (Attachment OW-038-3, SRK 2025d). A regional groundwater model was developed for the Tenas Project's EAC Application to help quantify the potential reduction of flow in Tenas and Four creeks, including during low flow conditions. The groundwater model was developed in 2022 and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				months (August) and winter baseflows; • Provide more information on the proposed water mitigations, including the reliability and risks of each option associated with failure of effective treatment, in addition to the expected beneficial change and the expected consequences of each treatment option;	was updated in 2024 (Attachment OW-038-4, SRK 2024b). That model estimated groundwater fluxes, discharge, and recharge from the Project. Groundwater connections are incorporated into the water and load balance model based on three components: direct connections to Project infrastructure, changes to stream baseflow, and load transport to streams. The change in water levels (groundwater head) within the Management Ponds, Control Ponds, and the open pit affect the groundwater discharge rates to each downstream creek and river. The calibrated rainfall-runoff model (in the water and load balance model) included a constant unit baseflow for each major creek, which is applied to each associated prediction node. To understand the change to baseflows attributed to the mine development, the groundwater model predicted baseline baseflow and baseflow during mining at each prediction node for each scenario. The forecasted change to baseflow between baseline conditions and mining conditions were directly applied to the baseflow component for each prediction node in the water balance model. Baseflow dominates the total streamflow during winter months but represents a minor portion of the total streamflow during the open-water season, late summer flow included. Baseflow rates in the receiving environment increase or decrease, depending on location in relation to the open pit and the Management Ponds. While the water outflows from the mine site into the groundwater system and into the creeks happen instantaneously due to its relation to the water head, there is a natural lag between the timing of seepage at the source and the seepage containing contaminant particles being observed within

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					the various stream prediction nodes (because of the slow travel time of groundwater). Particle tracing within the groundwater model (Attachment OW-038-4, SRK 2024b) revealed that a small portion of seepage reaches the adjacent reach of Tenas Creek before end of mining, but that most of the seepage will not be observed until well past closure. A conservative estimate is used in the water and load balance model of 25 year lag before the particles reach the streams. The contaminant load reaching each prediction node is calculated based on the percentage of particles leaving each Management Pond, open pit or Tenas Control Pond that reach each node under steady-state conditions, taking into account the dilution of mine seepage into the groundwater system. The mitigations that affect stream flows in Four and Tenas Creek are represented by Mitigation Controls 2 and 3 in the “Effect of Mitigation Controls on Water Quality and Quantity of the Tenas Project” memo (Attachment OW-038-2, SRK 2025c), which include the thicker liners compared to those used in the Final EAC Project Case (2024). The different liners used in the 3 different scenarios is outlined as follows: Final EAC Project Case (2024): - Soil-bentonite liner (0.3m) for EMP, NMP, and WMP (excluding WMP End Wall rock); - Bituminous geomembrane liner for the Tenas Control Pond. Mitigation Control 2: - Soil-bentonite liner (0.56m) for EMP, NMP, and WMP (excluding WMP End Wall rock); - Bituminous geomembrane liner on top of soil-bentonite liner

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					(0.15m) for the Tenas Control Pond. Mitigation Control 3: - Bituminous geomembrane liner on top of soil-bentonite liner (0.3m) for EMP; - Soil-bentonite liner (0.56m) for NMP, and WMP (excluding WMP End Wall rock); - Bituminous geomembrane liner on top of soil-bentonite liner (0.15m) for the Tenas Control Pond The effects of thicker liners are two-fold: reducing groundwater seepage to the streams compared to Final EAC Project Case (2024) and reducing contaminant load transported into the groundwater system pathways due to reduced seepage. Figure 1 1 illustrate the effect on flow in Tenas Creek (WQS04) and in Four Creek (WQS03_DS) due to the effect of thicker liners. In both cases, thicker liners cause a greater percent reduction in creek flows. Figure 1 2 shows the expected reduction in selenium concentrations if thicker liners are used. The reduction in concentrations is expected to be more significant for Four Creek. Note that the effects on flow and on concentrations do not occur at the same time because of the groundwater travel time delay the arrival of management and control pond water by about 25 years. Additional Information about Proposed Mitigation Measures and Best Management Practices: The risks and beneficial effects of water mitigation controls were evaluated using the water and load balance model for the Tenas Project (Attachment OW-038-1, SRK 2025b). Table 1 1 shows a

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					summary of mitigation control measures that were considered as part of the water and load balance evaluation. The mitigation controls can be categorized either as source control measures/best management practices (BMPs) or as best achievable technologies (BATs). This distinction is relevant because BC ENV has issued guidance on how candidate BATs must be evaluated (BC ENV 2024). That guidance states that BMPs must be evaluated separately and prior to a BAT assessment. In other words, a mine operation should first implement BMPs, which include source control measures such as mine rock covers or inundation of mine rock as well as operational practices that are carried out on a day-to-day basis such as the use of blast-hole liners. Only after BMPs have been considered and included as part of the Project description can BATs be considered. BATs are technologies that require construction of site infrastructure and implementation of water treatment equipment – i.e., typically more conventional pump and tank-based water treatment options. Best Management Practices as Mitigation Control Measures (see also Attachment OW-038-2) Through the development and design of the Tenas Project, TML has made efforts to include as many source control measures and BMPs into the Base Case as are practically achievable to manage water quality within and downstream of the Project Area, including: § Inundation of potentially acid generating (PAG) rock in the management ponds on site to prevent potential Acid Rock

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Drainage, § Lining of the management and control ponds to reduce seepage and groundwater recharge, § Progressive reclamation and covering of non-potential acid generating rock (non-PAG) backfilled into the open pit, § Construction of dam/butresses and backfills (and any potential external permanent piles and stockpiles) using a bottom-up construction methodology, § Attenuation of treated effluent in Tenas Control Pond, § Pacing of treated surface water discharge to the open water season, § Erosion prevention in collection and diversion channels, § Sediment control in sedimentation/control ponds, and § Clean (non-contact) water diversions to route water around Project activities. In addition to these, three other BMPs that had not previously been considered were evaluated in the water and load balance model study, namely (see Table 1 1): § MC1: Improve the robustness of the water covers in the management ponds and reduce loadings from waste rock by increasing the site water inventory during freshet, § MC4: Increase of process water intake to CPP plant, and § MC5: Addition of blasthole liners. Of these three, the addition of blasthole liners (MC5) was found to be suitable and feasible as a water quality mitigation measure for the Tenas Project, and TML therefore committed to using liners for the future mine operation. The two other BMPs, improving the robustness of the water cover (MC1) and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					increasing process water intake to CPP plant (MC4) were not considered to be suitable because they would (or could) reduce streamflow in Four Creek in the open-water season months (MC1) or would not lead to any notable improvement in the quality or quantity of discharge from the site (MC4). Blasthole liners work by reducing the amount of blasting residuals (undetonated ammonium nitrate fuel oil (ANFO) explosives) that dissolved into the mine contact water and thereby increases ammonia and nitrate concentrations. Undetonated ANFO is one of the main sources of nitrogen (nitrate, nitrite, and ammonium) in contact water at the mine site. Loadings of residual nitrogen species that leach from the rock into the mine water can be reduced if blasthole liners (long plastic bags that fit into the blasthole) are inserted as holes are loaded with explosives. The primary purpose of the liners is to prevent water from contacting and dissolving the ANFO explosive prior to blasting. For this mitigation control, the model assumes a total ANFO loss (and dissolution in mine water) of 1.25% when blasthole liners are used compared to 2% loss when liners are not used, which corresponds to a 32% reduction in ammonia, nitrate, and nitrite loadings. The use of blasthole liners increases the cost of mining because of the time it takes to insert liners into the blasthole before loading the explosives as well as the cost of the liners. However, there are no notable operational risks associated with the use of liners, only benefits. Best Achievable Technologies as Mitigation Control Measures (also see Attachment OW-038-2)

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					As discussed above, a BAT assessment was completed for the Project after review and selection of BMPs. The BAT assessment methodology followed guidance issued by the BC Ministry of Environment and Climate Change Strategy (BC ENV) in November 2024. The purpose of the BAT assessment was to identify technologies that are best suited for managing or mitigating identified Parameters of Concern (POCs) in modelled groundwater seepages and surface water discharge of treated effluent from the Project. POCs included nitrate, nitrite, sulphate, aluminum, cadmium, cobalt, copper, iron, nickel, zinc, molybdenum, and selenium. The BAT assessment is required to consider all possible technologies that potentially could remove one or more POCs. The BAT assessment for the Tenas Project identified 24 different technologies that potentially could be implemented. BC ENV recognizes that even though a technology theoretically could remove one or more POCs, there may be other reasons why it would not be suitable for treating water at a mine site. The BAT methodology lists the following reasons why a technology can be considered unfeasible: § Inability to achieve environmental criteria: – For example, a technology may remove some nitrate or metals but not enough to meet anticipated water quality effluent limits or downstream objectives. § Lack of existing commercial applications: – Technologies considered as BATs must, at a minimum, have a demonstration system operating at near full-scale in the same industry and under similar site-specific conditions. BC ENV's

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					guidance states that technologies considered for an Environmental Assessment Certificate application must have a Technology Readiness Level of 7, 8, or 9 to be considered potentially feasible. § Operational complexity: – This criterion considers several factors which may include, but are not limited to operator attendance requirement, chemical requirements, ease of process control, level of automation, level of expertise required to operate the system, maintenance requirements, and downtime expectations (for maintenance and repairs). After evaluating the feasibility of the 24 identified technologies, nine were found to be potentially feasible and carried on to a more detailed assessment: 1. Passive/Active Flocculation. 2. In-situ Active Gravel Bed Reactor (GBR). 3. Membrane Filtration + Moving Bed Bioreactor (MBBR). 4. Membrane Filtration + MBBR + High Density Sludge Lime. 5. Membrane Filtration + MBBR + Sulphide. 6. Membrane Filtration + MBBR + Ferric. 7. Membrane Filtration + MBBR + Ion Exchange. 8. Zero Liquid Discharge. 9. Modified Liners in Management and Control Pond. In addition to these nine, the Base Case with only BMPs included (i.e., the case with no additional BATs implemented) were also considered for comparison. BC ENV's guidance requires that the following general categories are used to evaluate BATs:

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					§ Reliability. § Control-effectiveness. § Environmental impacts, and § Cost effectiveness. Table 1 2 shows the criteria included in each of the categories, and how much importance (or weight) is assigned to each in the final assessment. TML added the evaluation category “Adherence to Yintah Management Directives” to formally include at least some direct consideration of first nations interests. The evaluation categories in Table 1 2 include reliability, risk, and expected benefits, which were referenced in the review comment. Risk and robustness are included in the reliability category. BC ENV described the ‘risk assessment’ criterion as follows: “Risk Assessment - Conduct a risk assessment for each technology to identify the potential risks associated with the implementation, operation, and maintenance of the technology. These risks may include but are not limited to the likelihood of process failure, environmental and human health risks resulting from process failure, as well as risks associated with secondary waste production (by-products) that may impact the environment and human health.” BC ENV describes the ‘robustness’ criterion as follows: “Robustness - means consistent and reliable performance under various conditions over the technology operational life. Evaluate technologies based on their ability to maintain effectiveness and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					performance under the fluctuations in operating conditions such as effluent quality (physical and chemical characteristics) and quantity (flow).” The expected beneficial water quality changes associated with water treatment technologies were evaluated as part of the control-effectiveness category. Additional information on other assessment criteria listed in Table 1 2 that were not specifically referenced in the review comment are included in the BAT assessment report in Attachment OW-038-3. From a water treatment and water quality protection perspective, the risk profile for the project is low. The updated water quality model results indicates that all water quality parameters in receiving waters downstream of the Project are expected to remain below chronic BC water quality guidelines (except for copper, which is naturally elevated in background waters). Therefore, if water treatment were to be implemented and subsequently fail it is unlikely that the lack of water treatment would adversely affect water quality in downstream waters since concentrations are expected to remain below BC water quality guidelines even without any water treatment. As discussed above, the BAT assessment weighted the potential beneficial effects of implementing various treatment options versus the risk, costs, and general consequences associated with each option. The multiple-accounts analysis (MAA) evaluation (Table 1 3) shows the scores assigned to the expected beneficial changes (pollutant reduction, toxicity reduction, and robustness categories) as well as scores assigned for reliability and risks (robustness and risk assessment categories). The

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					categories are scored on a scale from 1 to 5, where 1 represents a poor score (poor expected performance, low reliability, or high risk) and 5 represents a good score (expected to perform well, highly reliable, or low risk). Most of the technologies considered achieved scores of 3 or 4 (out of 5) for the risk assessment and robustness (i.e., reliability) categories. This means that reliability and risks associated with the different options are somewhat similar. The pollutant reduction category, on the other hand, shows that there is a greater different in expected beneficial effects with scores ranging from 1 to 4.5. However, the better performance comes at a cost with lower scores for cost-effectiveness and environmental and socio-cultural impacts. The following was concluded based on the assessment of Best Achievable Technologies for the Tenas Project: § The Base Case option is a highly rated and feasible option for protecting downstream water quality without the need for any further BMPs or technologies to be incorporated. § In-situ Active GBRs with the Base Case and Passive/Active flocculation with the Base Case are also highly rated and feasible options that should be retained as contingency options during permitting if water quality predictions for the Project differ substantially from actual conditions observed during the development of the Project and water quality monitoring results are trending toward exceedances of the WQGs. § To improve on the technology readiness level of the In-situ

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Active GBR technology, TML should develop a Pilot In-situ Active GBR within the Coal Processing Plant (CPP) Sedimentation Pond or alternate. § Active tank-based water treatment options with the Base Case are less suitable but feasible and should be retained as contingency options during permitting if water quality predictions for the Project differ substantially from actual conditions observed during the development of the Project and water quality monitoring results are trending towards exceedances of the WQGs. § Modification of management and control pond liners with the Base Case is less suitable but feasible and should be retained as a contingency option for the WMP during permitting if water quality predictions for the Project differ substantially from actual conditions observed during the development of the Project and water quality monitoring results are trending towards exceedances of the WQGs. Additional details concerning the two studies cited in the above response are available in Attachments OW-038-2 and OW-038-3. Finally, to address the last point of this IR, Telkwa Mining has carefully considered the reduction in flows and is not considering any mitigation that would induce further reduction in flows beyond what is shown in the Final EAC Project Case (2024). In addition, no exceedances above BC WQG has been shown to occur, outside of already elevated background concentrations such as copper. The current model results (in the Final EAC Project Case [2024]) showing reduction in flows from baseline is

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					currently assessed by SLR Consulting for its effects on fisheries. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans.
OW-039	350 and 351		Water Mitigation Measures and Treatment Options 2. Provide design alternative treatment options which are capable of meeting WQGs near appropriately sited discharge locations. Describe the reliability, control-effectiveness, and treatment efficiency of each mitigation option including the currently proposed option -- Reduce the seepages through the management pond liners by 90% and assume low flow conditions (modified alternate proposed option – refer to BC ENV Best Achievable Technology	The reliability and risks of each option are not discussed, and very little information is provided on situations where the mitigation option may be less effective/ ineffective (i.e., high or low run off conditions, liner failure, etc.). The water treatment plan option (Control 5) appears to be one of the most effective options, particularly when combined with other options. However, the design details of the water treatment plant have not been developed (which the proponent acknowledged in the document), and the reductions in constituent concentrations are only assumed. This would require additional storage and appropriate treatment rates, along with additional energy and waste disposal costs. As water treatment, in combination with other approaches, is the most effective way of reducing exceedances from the ponds, this option should be pursued but TML must provide more information on the details of that process (including detailed operations of the treatment facility over time, energy and water use,	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from Office of the Wet'suwet'en memo, SRK June 2025] Attachment OW-011-1. The majority of the information requested by Office of the Wet'suwet'en is included in the 2025 Best Achievable Technology (BAT) assessment report prepared by SRK consulting for TML (SRK 2025d and Attachment OW-038-3). The BAT assessment was conducted in parallel with a water quality model study that also looked at implementation of mitigations controls (i.e., Best Management Practices, or BMPs in the mitigation report (SRK2025b or Attachment OW-038-2)). In the BAT assessment, all possible water treatment alternatives are evaluated at a conceptual level and are scored and ranked according to various performance, reliability, environmental impact (including energy consumption), and cost criteria in accordance with 2024 guidance issued by the BC Ministry of Environment and Parks. The BAT assessment specifically evaluates suitability and risks associated with water treatment technologies. For example, the assessment concluded that in-situ gravel bed reactors (GBRs),

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			(BAT) guidance. BAT assessments are required prior to the development of Initial Dilution Zones (IDZs) – also refer to BC IDZ development guidance.	and efficiency of treatments, etc.). TML must provide further information on alternative treatment plans and outcomes that describe how the water treatment facility would be designed, what standards would be used, the operation, and the duration.	active and passive flocculation, and active water treatment options should be incorporated into the development plan as contingency measures for the Tenas Project in case parameter concentrations in future discharges are higher than modelled by the water and load balance model. As discussed in the response to OW-038, the risk associated with treatment processes that may be less effective than presumed is low because BC water quality guidelines prescribed for downstream receiving waters are expected to be met even if no water treatment is implemented. As also discussed in response to OW-038, the active water treatment plant options score better (scores of 2.5 to 4.5) than best management practices alone (score of 1) for treatment performance. However, the active water treatment plant options have considerable drawbacks that do not make up for their better treatment performance, and active water treatment plants are therefore not the preferred option to go forward with for this Project when evaluating holistically all aspects that need to be considered when ranking a particular technology. Nonetheless, TML has committed to including active water treatment options as contingencies in case the best management practices do not perform as well as expected or in case the mine water quality has higher parameter concentrations than modelled. Active water treatment, active/passive flocculation and/or In-situ Active GBRs will be implemented via a trigger action response plan that will include the monitoring of parameters of concern in the management and control ponds, at the end of the pipe, in the receiving environment, and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					groundwater seepages. If monitoring data indicates that one of these contingencies will be needed to avoid significant adverse effects to the surface/groundwater Valued Components it will be implemented at that point. Detailed design information requested in this review comment associated with active water treatment will be provided as part of permitting process for the two contingency options recommended by the BAT as it is outside the requirements of a BC environmental assessment. As recommended by the BAT report in Attachment OW-038-2) an active water treatment plant is not the highest ranked option to pursue and is being maintained as contingency option that will be implemented as required based on a Trigger Action Response Plan (TARP), which will be developed for permitting. The highest ranked options are to (1) continue with the existing Base Case (also called Final EAC Project Case 2024) with best management practices incorporated (2) use passive or active flocculation to remove suspended solids, (3) implement In-situ Active GBRs in the management ponds in addition to the BMPs incorporated in the Base Case. TML has committed to developing a pilot In-situ Active GBR in the Coal Processing Plant Sedimentation Pond or alternative pond to improve this technology's TRL to at least an 8 for the targeted Parameters of Concern prior to the end of Year 4 of the Operation Phase. The reduction in POC concentrations that can be achieved by different treatment technologies are generally very well understood. Most technologies are operating at many different mine and/or industrial sites all over the world. True site-specific

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					performance testing can only be performed once the mine water from the Tenas Project becomes available. Until that happens, the technology performance estimates will be based on reliable data from other sites. As discussed in the response to OW-038, TML considered 24 alternative treatment options in the BAT assessment (Attachment OW-038-3). The preferred options were to proceed with (1) the Base Case that includes best management practices, (2) use passive or active flocculation to remove suspended solids, (3) active In-situ GBRs, and finally (4) active water treatment, most likely using reverse osmosis and moving bed bioreactors with high density sludge lime treatment. The design of each of these control measures would begin with the development of a detailed design basis, which would specify the flow rates, water quality, and temperature of the water to be treated, how much water would need to be treated in each month, and what effluent concentrations would have to be achieved. Based on this design basis, engineers will proceed with preliminary designs, which will be reviewed at 30%, 60%, and 90% complete stages. Following these reviews, issued for tender designs will be submitted to water treatment equipment companies who will issue proposals for manufacture, supply, and construction of the water treatment facilities. At that stage, a final design for construction is completed. Design standards to be used can be specified in the design basis, or they can be defined by each equipment supplier as part of the proposal. The company supplying the active water treatment equipment would be responsible for commissioning the active water

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					treatment system, but TML would be responsible for operating it for the life of the mine and potentially beyond into the Post-Closure phase. According to the updated water quality model results, active water treatment is not expected to be necessary during the operating phase of the mine or following closure as model results show no water quality guideline exceedances in the Receiving Environment under the Base Case (Final EAC Project Case 2024, as presented in Attachment OW-038-1). Active water treatment should therefore not be necessary. However, TML will develop a TARP that specifies criteria for when and under what circumstances active water treatment would be implemented despite the expectation that no treatment is needed based on the modelling work completed. As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans
OW-040	356	Appendix F, Section 4.10.3-4.10.4; Attachment IR 356-1 (This attachment located in App F has no information, not reviewed); "Final	Pond Liner Design and Surface Water Quality Have a QP run three new WLBM scenarios. Add a new node to the WLBM in Goathorn Creek, 100m downstream of the confluence with the tributary into which the effluent is discharged. For	We are unable to find the documents containing the results of this IR response, "Final EA Water and Load Balance results", or Attachment IR 356-1 as the IR response does not provide further information regarding where these documents are located. We are unable to find any documents with that name in the review materials provided to us and therefore could not review the IR. Please provide these documents, including figures for	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Please refer to Attachment OW-038-1 for the Updated Water and Load Balance Model report (SRK, 2025) and refer to Attachment OW-040-1 for Updated Figures 2-2 through 2-4 with corrected connections for Four, Tenas, and Goathorn Creeks.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		EA Water and Load Balance Report"(could not locate, not reviewed)	the 3 scenarios listed above, for each node where a parameter is predicted to exceed a chronic BC WQG PAL, each graph, show the chronic BC WQG for the most sensitive use or value.	each of the requested scenarios in the IR (Tributary receiving discharge above confluence with Goathorn Creek, and Goathorn Creek below confluence with tributary receiving discharge); projected water quality from baseline through to post-closure; and updated figures from the WLBM report (Fig 2.2-2.4 of App 4.3) that showed incorrect connections of the three creeks (Four Creek, Tenas Creek, Goathorn Creek).	As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans.
OW-041	NEW	Appendix F, Section 4.18; "Final EA Water and Load Balance Report"(could not locate, not reviewed)	Water and Load Balance Model Have a QP add additional model nodes to represent conditions at: • Tributary receiving discharge above confluence with Goathorn Creek • Goathorn Creek below confluence with tributary receiving discharge and provide WQ results for these nodes	We are unable to find the documents containing the results of this IR response, "Final EA Water and Load Balance results", or Attachment IR 356-1 as the IR response does not provide further information regarding where these documents are located. We are unable to find any documents with that name in the review materials provided to us and therefore could not review the IR. Please provide these documents, including figures for each of the requested scenarios in the IR (Tributary receiving discharge above confluence with Goathorn Creek, and Goathorn Creek below confluence with tributary receiving discharge); projected water quality from baseline through to post-closure; and updated figures from the WLBM report (Fig 2.2-2.4 of App 4.3) that showed incorrect	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Please refer to Attachment OW-038-1 for the Updated Water and Load Balance Model report (SRK, 2025) and refer to Attachment OW-040-1 for Updated Figures 2-2 through 2-4 with corrected connections for Four, Tenas, and Goathorn Creeks. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				connections of the three creeks (Four Creek, Tenas Creek, Goathorn Creek).	
OW-042	NEW	Appendix F, Section 4.18.2; Attachment IR 515-3 (not reviewed), "Final EA Water and Load Balance Report"(could not locate, not reviewed)	Water and Load Balance Model Have a QP clarify if the background water quality inputs used in the model were annual median values or if monthly (or seasonal) median values were used. If so, provide values and ranges. If not, rerun models to do so	Reporting the use of different time scales is troublesome, especially in a region with high seasonal variability. The caching of all "open water" months into one "summer season" is not appropriate as there are very different climate and ecosystem processes influencing or influenced by spring vs summer vs fall water quality dynamics. The use of one seasonal value may be skewed by over-represented high or low values that occur during more months, and therefore not representative of periods exhibiting seasonally low or high values. Monthly values would be more appropriate to capture full seasonal variability. Please provide this information. In addition, we were unable to fully review this IR because we could not locate the referenced document "Final EA Water and Load Balance Report". Please provide this information.	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. TML agrees with the reviewers that seasonal background baseline parameter concentrations may be skewed by specific months within the baseline dataset that is available. However, some months contain only a few datapoints (3), which is the minimum statistical sample size from which to calculate representative percentiles for each month, for each parameter and within each creek. However, to investigate an answer this IR and as the minimum sample size of 3 was achieved for all months, monthly seasonal background baseline concentrations were modelled for each parameter used in the model (see Attachment OW-42-1) and compared to the seasonal background baseline concentrations used in the Final EAC Project Case (2024). Model results from the two scenarios were also compared to the BC water quality guidelines applicable for each stream. As suggested by the information request, the use of background monthly averages rather than background seasonal averages increases the modelled variability in the modelled results for the receiving environment. Table 1 4 shows maximum monthly modelled results that exceeds the water quality guideline calculated for the respective creeks for both model cases

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					(seasonal background concentrations [Final EAC Project Case 2024] and monthly background concentrations). In both cases, dissolved cobalt exceeds in Four Creek as the main load of cobalt to the creek is coming from the Project. Similarly for both cases, dissolved copper was modelled to exceed water quality guideline in Tenas and Goathorn Creek. Total aluminum only exceeds the water quality guidelines under the monthly background concentration case in Four, Tenas and Goathorn Creeks. Similarly, total iron and total beryllium also exceed water quality guideline in Tenas and Four Creeks, respectively. Both dissolved copper and total aluminum are naturally elevated in the background baseline dataset and are often found in exceedance of the BC Water Quality Guidelines, as highlighted by the baseline study. The water quality model results that use monthly or seasonal background concentrations indicates that the load coming from Project represents often a few percents only (<5%) of the total load for the parameters that exceed water quality guidelines in the creeks and rivers. Therefore, the effluent from site is not expected to cause any measurable increase in the naturally elevated background concentrations. Note that total Beryllium was further examined, and it was determined that the indicated exceedances are due to higher detection limits (0.0001 mg/L to 0.0015mg/L) that are close to or above the water quality guideline for total beryllium (0.00013mg/L). These elevated detection limits are biasing the results and showing artificial exceedances. In fact, beryllium concentrations was never measured above detection limit in the baseline dataset and no beryllium load comes from site.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					The parameters listed in Table 1 4 have already been identified as Parameters of Concerns in the BAT assessment (except for total beryllium, which is always below the analytical detection limit). Therefore, options for removing these constituents from site water before it is discharged have already been evaluated and TML has committed to implementing the recommendations made in the BAT assessment. TML has also committed to continue developing the water quality baseline dataset to improve the characterization of monthly/seasonal conditions such that a greater range of background conditions could be incorporated in the next revision of the WLBM during permitting. The monitoring program proposed will have reference sites above where the Project is expected to have any effects and naturally occurring monthly exceedances at these locations will be able to be understood in the context of measured values downstream where the Projects is expected to have an influence on parameter concentrations. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans.
OW-043	NEW	20241115 TML Water Quality IR Response-posted.pdf (pages 5-8);	Water and Load Balance Model Table 6.2-1 of the Discharge Management Plan lists many surface discharges that are not	The organization of various ponds and their connectivity, as well as the lack of data associated with each pond is an obvious source of confusion in the application. This theme arises in many comments throughout the proponent’s IR	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Attachment OW-043-1 provides the map of Sedimentation ponds

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Appendix F, Section 4.5	incorporated into the WLBM. For all other discharges, indicate where each is characterized in the Application including water quality predictions, discharges, mitigations, and residual effects	response. Discharges from sedimentation ponds (excluding Tenas Control Pond/North Management Pond and Rail Infrastructure Pond) are directed towards natural ground. The Proponent plans to convey this water along natural flow pathways to eventually reach downstream watercourses. Despite use of pumps and other structures for controlled release, there is risk of overflow and higher amounts of release during high rain events, which may increase downstream erosion potential. The Proponent must provide a clear map of the location and connectivity of each pond along with an associated table that includes all the requested information from the IR.	not included in the Final EAC Project Case (2024) Water and Load Balance Model as requested and demonstrates that the sedimentation ponds are not readily connected to one another nor the Tenas Control Pond/North Management Pond. Attachment OW-043-2 provides the modelled water discharges, water quality predictions, operational period, mitigations, and residual effects associated with erosion and sediment control for the sedimentation ponds not included in the Final EAC Project Case (2024) Water and Load Balance Model. TSS is not modelled from any pond but rather is a source control design requirement of each pond (ponds have been designed large enough for expected material) so that no pond will release higher than an average of 35 mg/L during a 1 in 10 year storm event at the end of pipe and survive a 1 in 200 year event as required by the regulations. By the time this water reaches an actual water course via overland route through vegetation the TSS levels will be much lower than end of pipe levels thanks to natural attenuation by vegetation along the discharge route. The sedimentation ponds are 100% controlled by pumping to a velocity reducing non-erosional structure like a concrete box which will slow water flows to a level that can then flow into the armored emergency spillway which reduces flows even further through the spillway itself. Water then flows to an apron discharge structure that finally discharges to the surrounding environment to ensure water velocities do not cause erosion in the receiving environment.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					As a contingency to potential erosion and sediment control, a risk assessment will be performed with the OW for the likely discharge path for overland flow and if additional erosion sediment control measures are identified to be added such as silt fencing, ability to place floc blocks in storm events will be incorporated. This can be done immediately. If during this review, the engineered discharge system and/or sedimentation ponds also require modification to further reduce potential erosion and sediment control these can be completed. Another contingency will be the ability to install pump back systems in these sedimentation ponds to divert flows to the Tenas Control Pond, if necessary, where TSS levels are expected to be addressed by the large settling time available in this pond plus contingent flocculation/coagulation facilities which again can be done immediately. A final contingency would be secure an active mechanical system that can treat higher TSS inflow water to meet regulatory guidelines which again be done quickly as these systems are readily available within the province. Telkwa Mining will provide an updated discharge management plan during the permitting process for OW and regulatory agencies to review and provide feedback on. During the permitting process, Telkwa Mining will provide detailed plans for the required EMA authorization applications including discharge management plans for the OW and regulatory agencies to review and provide input. As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					additional sedimentation ponds to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-044	NEW	Appendix F, Section 4.53	Water and Load Balance Model Follow up comment to above: The discharge of effluent from sedimentation ponds to the receiving environment does not follow best management practices. Erosion resulting from the discharge has the potential to increase the primary POPC (TSS) to receiving water. The cumulative effects of these additional discharges to the receiving environment have not been accounted for in the IDZ study and need to be quantified.	Note that an IDZ will not be considered during permitting without an adequate BAT assessment. Given that a new BAT assessment has been performed with alternative treatment options, the IDZ study would need to be redone to account for water quality differences derived from various different treatment options. The comment does not address the need to also evaluate cumulative effects around the IDZ. In addition, the proposed frequency of monitoring for exceedances is inadequate given the risk to downstream fish. These ponds will be monitored monthly to evaluate toxicity results against authorized limits for lethality of Rainbow Trout. If exceedances exist, a number of actions are proposed to reduce exceedance, but given the frequency of monitoring (monthly) and the amount of time required for implementation of the proposed actions, it is possible exceedances (and downstream negative effects) could persist for a substantial amount of time (months) before any resolution. This presents a considerable prolonged threat to fish and ecosystem health. TML must correct these discrepancies.	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-044-1 for the Updated 2025 IDZ report (SRK 2025e). The report updates the IDZ assessment based on latest findings of Best Achievable Technology (BAT) assessment and updated effluent discharge information from the Water and Load Balance (WLB) model for the Project (Attachments OW-038-1 and OW-038-3). The assessment was carried out following the Technical Guidance 11 (TG11) produced by the BC Ministry of Environment and Parks. The IDZ is in Goathorn Creek below the confluence with a tributary that receives Project discharge from the Tenas Control Pond (TCP) and North Management Pond (NMP) during operation and post closure, respectively. This also includes discharge from the sewage treatment plant during operation. Three cases were defined based on conservative assumptions considering the in-stream flow and water quality of Goathorn Creek, and discharge rate and quality of Project effluent, using a combination of monthly maximum or average water quality concentrations with typical source terms along with mean flow or 7Q10 low-flows during effluent release period (OW-044-01), according to the following Table 1 5: Parameters identified as POCs in the BAT assessment and considered in this study are listed below: § Nitrogen Nutrients: Nitrate, Nitrite

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					§ Sulphate § Metals: Aluminum (total), Cobalt (dissolved), Copper (dissolved), Iron (total), Nickel (dissolved), Zinc (dissolved) § Oxyanions: Molybdenum (total), Selenium (total). The modeled water quality of each POC in the Goathorn Creek was compared with the IDZ evaluation criteria for flow occupied within the IDZ and its length and width, based on TG11 guidance. For the worst case, nitrite and selenium do not meet WQG after complete mixing and aluminum exceeds the IDZ criterion for 100 m length during operation, while aluminum and selenium do not meet WQG after complete mixing in post-closure. This case is very conservative and unlikely to occur during very dry periods. Emphasis was placed upon the reasonable worst case and the expected case, which are conservative but provides realistic evaluation scenario. The results are summarized below. During Operation: - IDZ criteria to meet applicable WQGs are satisfied for nitrate, nitrite, sulphate, aluminum, cobalt, iron, nickel, zinc and molybdenum for the reasonable worst and expected cases. - The IDZ extent of selenium exceeds the TG11 guidance (100 m length) for the reasonable worst case (153 m length), but meets the guidance for the expected case. WQG is exceeded for dissolved copper due to background concentration higher than the WQG, but the effluent concentration reaches background concentration after complete mixing. During-Post Closure: - POCs including nitrate, nitrite, cobalt, molybdenum, nickel and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					zinc do not register an IDZ, as the effluent concentrations are below the corresponding WQGs for the IDZ cases. - IDZ criteria based on TG11 guidance is met for sulfate, aluminum, iron and selenium for the reasonable worst and expected cases. The guidance is exceeded for dissolved copper with background concentration higher than the WQG, but remains close to the background level after complete mixing. The analyses of this study provided a range for spatial extent of IDZ for conditions anticipated for worst to expected cases as outlined in TG11. Based on the reasonable worst case and the expected case, a minimum IDZ length of 153 m and 44 m would be needed during operation and post-closure, respectively, to meet the instream WQGs of the POCs. While there are other potential treatment options provided in the BAT (Attachment OW-038-3) these are only contingencies. The Final EAC Project Case (2024) does not have any parameter exceedances beyond the edge of the dilution zone besides baseline parameters that are already in exceedance. If in the future monitoring and the trigger action response plans indicate that a water treatment contingency needs to be implemented, a revised IDZ will be submitted as part of the notification for construction. As illustrated by Attachment OW-043-1, the sedimentation ponds are not part of the WLBM and do not contribute to cumulative effects within the IDZ in Goathorn as their flows are either not directed towards Goathorn Creek's IDZ area or the pond is not operational when discharge is occurring from the Tenas Control Pond or from the North Management Pond.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Furthermore, the sedimentation pond flows not included in the Project's WLBM are orders of magnitude lower than what is expected from the Tenas Control/North Management Pond. Finally, the ponds have been designed to not exceed a maximum average TSS concentration of 35 mg/L at the end of pipe. Final Permit documents from the government will provide the required frequency of monitoring and what parameters need to be measured when the ponds are both flowing or not flowing. As a contingency to potential erosion and sediment control a risk assessment will be performed with the OW for the likely discharge path for overland flow and if additional erosion a sediment control measures are identified to be added such as silt fencing, ability to place floc blocks in storm events these will be incorporated which can be done immediately. If during this review, it is identified that the engineered discharge system and/or sedimentation ponds also require modification to further reduce potential erosion and sediment control these, these modifications can be completed. Another contingency will be the ability to install pump back systems in these sedimentation ponds to divert flows to the Tenas Control Pond if necessary where TSS levels are expected to be addressed by the large settling time available in this ponds. Additional contingent flocculation/coagulation facilities will also have the ability to be done immediately. A final contingency would be secure an active mechanical system that can treat higher TSS inflow water to meet regulatory guidelines. TML will provide an updated discharge management plan during

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					the permitting process for OW and regulatory agencies to review and provide feedback on.
OW-045	NEW		Selenium Data Have a qualified professional identify lentic areas in the receiving environment which may receive selenium from mine operations, and ensure that background concentrations of selenium in water, sediment, invertebrate, and fish tissues are collected and compiled in those lentic areas.	The concern here is sedimentation and conversion of selenium species, so there may be opportunities for this in micro-lentic environments such as back channels and pool environments along the stream course, but according to the proponent in this local study and regional study region there are no lentic environments.	Telkwa Mining acknowledges that the comment is closed, and no further response is required based on the OW information.
OW-046	176	20241115 TML Water Quality IR Response-posted.pdf (pages 20-30); Appendix I (all)	Alternative Treatment Options Provide conceptual design of alternative treatment options, mitigation measures, and management structures that can prevent the discharge of water that is not suitable for release to the environment (e.g., does not meet BC WQGs or	However, there are no actual plans or outcomes developed that describe how the water treatment facility would be designed or operate, some of the benefits are based on assumed targets met through treatment. This is acceptable but should be fleshed out further, and it should be confirmed that these targets can actually be met if this is considered a feasible option. The Proponent is also assuming the water quality treatment would persist past the end of closure as the model shows results out to 2100. Additional information on water treatment facility is	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from Office of the Wet'suwet'en memo, SRK June 2025] Attachment OW-011-1. Water treatment methods for reducing selenium and nitrate-nitrite were considered in the BAT assessment (Attachment OW-038-3) and include either an active In-situ gravel bed reactor (GBR) or anaerobic moving bed bioreactors (MBBR). The operation of a GBR is described in the BAT assessment report. A GBR is a pond or reservoir that has been backfilled with coarse rock/gravel, covered by an insulating layer (soil and/or organics)

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			another objective established by BC ENV)	needed (design, standards, operation and duration) and should not be assumed if this is considered as an option, in conjunction with other mitigation strategies (it is included on the list of combined best options). There are also effects on streamflow in Four and Tenas Creek, which should be explored more with the water load balance model. Goat Creek was not included in the model outputs, although this is acknowledged by the authors. Impacts on Goat Creek should be included in additional assessment of further mitigation strategies.	and fitted with injection and extraction wells. The operation of a GBR is illustrated in Figure 1 3. Mine water flowing to the injection wells is dosed with a source of easily degradable organic carbon such as methanol or glucose and other nutrients as required. Inside the GBR, microorganisms degrade the organic carbon. For the Tenas Project, the GBRs would be constructed within the water management ponds using the rock that is already planned to be placed and submerged in the ponds. The treatment system would be operated by pumping mine contact water to the injection wells and dosing the water with a source of organic carbon (shown as amendment delivery system in Figure 1 3). The degradation process of carbon consumes oxygen and oxidizes species such as nitrate, ferric iron (Fe3+), selenate (SeO42-), and sulphate (SO42-) and produces reduced constituents such as ferrous iron (Fe2+), selenite or elemental selenium (SeO32-, Se0) and sulphide (S2-). Sulphide can form insoluble precipitates with dissolved metals such as copper, lead, cadmium, nickel, and zinc, which will be removed in the process. These precipitates will be permanently kept below water at the bottom of the management ponds and are not expected to re-enter the environment due to redox conditions presents. The mining industry is in the second decade of adopting GBRs. A full-scale GBR with a treatment capacity of 20,000 m3/day has been constructed at the Rainy River Mine in Ontario and currently operates as primary water treatment for the removal of copper and nitrate. At two coal mines in the Elk Valley in BC, saturated

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					rockfill reactors (SRFs) – a variant of GBRs – are currently used to remove selenium and nitrate from mine water. Figure 1 5 shows a simplified schematic of an anaerobic MBBR process. Feed water is pumped to the anaerobic bioreactor where organic carbon and nutrients are added. The bioreactor provides sufficient residence time for anaerobic microbes to degrade the organic carbon and complete the reduction process. A post treatment stage consisting of an aerobic bioreactor that removes residual organic carbon and reduced species produced by the anaerobic bioreactor (such as sulphides) treats the effluent from the anaerobic bioreactor. A solid-liquid separation step such as a clarifier, pond and/or filter may be required to remove residual biosolids. From the post treatment stage, the treated water flows to an effluent tank and from there it is discharged to the receiving environment. Anaerobic bioreactor processes are common and conventional processes for removal of selenium and nitrate from mine water. For nitrate removal, it is the only process in common use. If anaerobic biological treatment were to be implemented for the Tenas Project, both nitrate and selenium would be targeted by the process. However, conventional anaerobic biological treatment would likely not be able to remove the selenium concentrations in untreated effluent that are generally modelled to be less than 0.020 mg/L and often less than 0.010 mg/L. Anaerobic biological treatment can generally only be relied upon to achieve a selenium concentration of 0.010 mg/L. Therefore, a membrane filtration stage would be required to pre-concentrate

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					the untreated discharge before it is treated by the anaerobic biological. For the Tenas Project, the MBBR process would be operated by pumping mine water from the Tenas Control Pond directly to the treatment plant and then discharging the treated water. The assumed water treatment performance is based on knowledge of treatment processes that operate at similar sites. Therefore, both the estimates or assumed performances of the treatment processes and the limitations and potential risks associated with treatment processes are based on real-life examples and are therefore reliable for deciding what treatment processes or Best Management Practices are likely to be most suitable for the Tenas Project. However, as discussed in the BAT report (Attachment 6), estimated treatment performances must be verified by site-specific tests. Therefore, a key recommendation, which was adopted by TML, is to initiate pilot trials on site to verify the assumed performance of the selected treatment processes. The updated water quality model scenario that evaluated water treatment options did assume that water treatment would continue until year 2100. However, the updated water quality model results shows that there would be no exceedances of water quality guidelines in the receiving environment even if no treatment is used during the mine’s operations and post-closure phases. The detailed design information requested by in the review comment will be provided as part of permitting for the two contingency options recommended by the BAT. Detailed design

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					is outside the requirements of an environmental assessment. Implementation and operation of an active water treatment systems will be based on a trigger action response plan developed during permitting. The trigger action response plan will identify appropriate early trigger concentrations or concentration trends in the end of the pipe discharge, in the management and control ponds, and groundwater seepages that will cause TML to begin implementing and operating the treatment systems. The highest rank options are to continue with the existing Base Case with Best Management Practices incorporated (Final EAC Project Case [2024]) or implement an active In-situ GBR in the management ponds. TML has committed to developing a pilot active In-situ GBR in the CPP Sedimentation Pond or alternate pond to improve this technology's TRL to at least an 8 for the targeted Parameters of Concern prior to the end of Year 4 of the Operation Phase. As discussed above, in 2025, two studies were completed that evaluated the effects of implementing best management practices and best achievable water treatment technologies (SRK 2025d - Attachment OW-038-2; SRK 2025c - Attachment OW-038-3). Both studies made use of updated water quality model results that included potential effects on streamflow in Four and Tenas Creek and potential effects on Goathorn Creek was also included in the model assessment – see Attachment OW-038-2 for direct impact on Goathorn streamflow. As requested by the OW, Telkwa Mining will discuss appropriate

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					incorporation of the results of forthcoming information related to additional sedimentation ponds to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-047	154, 157, 161	App Pa- Memo Geoscience IR_round2_respon ses SRK.pdf (pages 17-18)	Water Quality Modelling 1. Prepare a sensitivity within the WLBM to evaluate how a 4-meter thickness of PAG rock left exposed in a management pond during a period of early closure would affect water quality.	We are concerned that the Proponent dismissed this request saying that under properly managed scenarios this would not be a concern. However, it doesn't provide information on the effects of exposed PAG to water quality under scenarios where the management pond techniques fail, such as failure of a pond dam or failure of the pumping system to work as designed. The Proponent must provide this information and include scenarios in the water quality model for estimating impacts where management actions fail, to provide a clear picture of the downstream impacts of PAG under less-than-ideal conditions, but conditions that could possibly occur if there are situations where proper management cannot occur (failure of pumping system or pond dam, or some other instance where a 2m cover of water cannot be maintained).	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from Office of the Wet'suwet'en memo, SRK June 2025] Attachment OW-011-1. Under typical operations, SRK has tested a variety of climate conditions to verify whether water cover could be maintained during operations and in closure through Water and Load Balance Modelling (Attachment OW-038-1). Of note, a scenario considering 3 consecutive 1/200 dry year were applied in the WLBM during the years when water demand is highest (2040-2043). The higher water demand is due to the highest volume of PAG being placed in the West Management Pond during that period and the water is needed to fill the voids contained in the PAG. Water cover under this scenario could be maintained during that time at 0.5m, which was deemed acceptable for operational purposes (higher amount of water covering the PAG layer would prevent safe PAG dumping in the management pond), and up to the maximum water level of 1.0 m. Another scenario considered stochastic climate conditions throughout the life of mine and in post-closure to also test whether water cover could be maintained. Results show that water cover could be maintained throughout operations and in long-term closure (see results in Attachment OW-038-1).

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					In addition to water balance modelling under relevant climate scenarios, other contingencies exist that would allow to maintain water cover in the ponds: - Water contained in Tenas Control Pond (operating capacity up to 850,000m3 with an additional contingency storage of 210,300 m3 to manage large storm events) can be used to top up any management pond that would need it instead of discharging during the open water season (May until October). - Seepage from the Pit during operations can be redirected to a different management pond when needed. - Channel 02 (C02) capturing unimpacted runoffs North of the backfill could be redirected to any management pond were it needed. - Water contained in the voids from the NAG/OVB cover (above the PAG layer) in the management ponds can be pumped to other management ponds when needed (volume of water for NMP, EMP and WMP is 0.840, 3.7 and 7.6 million m3 respectively). In case of a pump failure, similar contingencies will be relied upon for the relatively short period of time (likely no more than a few days) it would take to repair or replace the pump, including: - Gravity seepage from backfill (instead of pumping) can be established to provide extra water cover for any of the active management pond (i.e. management pond with active PAG placement) - Channel 02 can be redirected by gravity to EMP, which in turn can overflow into NMP - The Project will operate a network of pumps for conveying water between all three management ponds, which adds redundancy

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					to the system. In a worst-case scenario, where a pump would have to be replaced and if a spare pump is not kept on site, a rental pump could be mobilized to site in less than one to two weeks. A lack of pumping for such short durations would not lead to the loss of water cover in any of the management pond below the PAG level. This was illustrated by Figure 1 5 (scenarios with or without pumping from TCP to WMP, which requires the most amount of water to fill PAG voids), which shows that even without pumping from TCP, water cover can be maintained in WMP. Dam breaches are very rare occurrences, but plans need to be in place in the very unlikely event that it happens. A dam breach is an extremely serious event that can be extremely hazardous to personnel and the environment. That said, the risk associated with a detrimental increase in loadings from PAG materials temporarily exposed following a dam breach is very low to negligible, for the following reasons: § Following a dam breach, priority would be given to repairing the breach and restoring the function of the dam. There is no credible scenario where this would not occur. § Metal leaching from exposed PAG material is similar to exposed non-acid generating (NAG) material until the PAG begins to produce acid rock drainage (ARD). § For the PAG material excavated at the Tenas Project, it is estimated that material must be exposed for 3 to 5 years before any ARD begins to develop. § There is no credible scenario where PAG material would be left

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					exposed for over 3 years following a dam breach to generate ARD. Therefore, such a scenario will not be modelled. § Permit conditions that state that PAG must not be exposed to air for more than a given number of months (six months, say) are common and such conditions are enforced by Provincial regulators. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to additional sedimentation ponds to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-048	154, 157, 161	Appendix E of Appendix 4.3-A	Water Quality Modelling 2. Provide a sensitivity in the water quality model to allow PAG exposures on pit walls to understand how exposure of PAG may affect downstream water quality.	We were unable to review this IR responses as we were unable to find the supporting information. Please provide this information.	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. The sensitivity requested in the IR# 154-2 included the following request: IR 154 b): “Provide a sensitivity in the water quality model to allow PAG exposures on pit wall to understand how exposure of PAG may affect downstream water quality.” A model sensitivity scenario was developed in this response to address this IR and is described below. Introduction In the current mine plan, pit walls are proposed to be covered

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					gradually as mining progresses. It was determined that the only probable scenario where pit walls remain uncovered would be if mining stopped unexpectedly. In the unlikely event that mining stops during operations, it is plausible that some of the pit walls would be exposed for an extended period. Geochemical testing (SRK 2024c) indicates that several of the rock units exposed in the pit walls are potentially acid generating (PAG) and will produce acidity when all of the neutralizing minerals (e.g., carbonates) are consumed. Acidic drainage from the pit walls could therefore develop if they are left uncovered and the wall rock continues to oxidize. A conservative model scenario was developed considering operations to stop at the end of the construction of the East management Pont (EMP – Year 8 in the mine plan), as it represents the largest exposed pit wall surface area that would remain exposed if no other mitigation measures were implemented prior to the unplanned cessation of operations. It was assumed that it would take 15 years to resume operations and all pit wall surfaces that were not covered prior to Year 8 would remain uncovered during this period. If mining stops at that time, a pit lake would start forming in the backfill collecting different inflows including the runoff from meteoric water flowing over the uncovered pit wall areas. The following subsections describe the geochemical conceptual model, model development and the water quality results for the geochemical pit lake model. Pit Lake Geochemical Conceptual Mining of the Tenas Project will result in open pit walls that are exposed to atmospheric oxygen, which would continue to occur if

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					they remain uncovered due to mining stopping unexpectedly. When exposed to oxygen, sulfides that are present in the open pit wall rock will oxidize according to reaction 1 (Rxn 1) producing sulfate, acidity, ferrous iron, and release of trace chalcophile elements. $\text{FeS}_2(\text{s}) + 7/2 \text{O}_2(\text{g}) + \text{H}_2\text{O}(\text{l}) \leftrightarrow \text{Fe}^{2+}(\text{aq}) + 2\text{SO}_4^{2-}(\text{aq}) + 2\text{H}^+(\text{aq}) \text{ (Rxn 1)}$ Under oxidizing conditions, ferrous iron liberated during sulfide oxidation will subsequently oxidize to ferric iron in neutral pH producing additional acidity according to the following reaction: $\text{Fe}^{2+}(\text{aq}) + 1/4 \text{O}_2(\text{g}) + 2 \text{H}^+(\text{aq}) \leftrightarrow \text{Fe}(\text{OH})_3(\text{s}) + 2\text{H}^+(\text{aq}) \text{ (Rxn 2)}$ Although oxidation of mine rock for the Tenas Project will release acidity, acidic conditions are not predicted to occur immediately since these materials also contain carbonate minerals that will neutralize the acid according to the following reactions: $\text{CaCO}_3(\text{s}) + \text{H}^+(\text{aq}) \leftrightarrow \text{HCO}_3^-(\text{aq}) + \text{Ca}^{2+}(\text{aq}) \text{ (Rxn 3)}$ $\text{CaCO}_3(\text{s}) + 2\text{H}^+(\text{aq}) \leftrightarrow \text{H}_2\text{CO}_3(\text{aq}) + \text{Ca}^{2+}(\text{aq}) \text{ (Rxn 4)}$ Depletion calculations (SRK 2024c) indicate that the lag times to acid generation are on the order of years (>5 years based on the average bulk rock properties). The lag time to acid generation prediction based on HCTs was confirmed by the barrel testing results. Barrel 6, which is a composite sample of rock from Zones 6 and 7, became acid generating in October 2023, four years after the barrel program was initiated. SRK (2024c) indicated that these zones were non-PAG based on their average bulk geochemical properties. However, the weighted barrel 6's NPR (0.5) was more closely aligned with the minimum and P5 NPR

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					observed for these zones (see Table 4 in SRK (2024c)). The lag times to the onset of acid generation based on the Zone 6 and 7 minimum NPRs ranged from 3 to 5 years. To provide a conservative prediction of pit lake water quality, onset of acidic conditions of pit wall PAG rock was assumed to commence in Year 4 of the model. Once mining stops, a lake will form as the pit fills with water, which will reduce the exposure of pit walls to atmospheric oxygen. Submerged wall rock will become isolated from atmospheric oxygen minimizing oxidation of inundated wall rock. A high wall will exist above the pit lake composed of approximately 30% of PAG-rock which will be acid generating once acid neutralizing minerals are consumed; the remainder of the pit walls are composed of non-PAG rock and overburden. It is assumed that the overburden and the non-PAG rock will be weathered containing limited sulfide and will not produce acidic conditions. Soluble oxidation products will be flushed from exposed open pit wall surfaces in the high wall by meteoric water contacting and mix together with other inflows (e.g., groundwater inflow) in the pit lake (Figure 1 6). If the pit lake remains alkaline, several secondary mineral species will become supersaturated in the pit lake and precipitate from solution. Sorption of other element species will also occur which can also limit concentrations of these constituents. If the lake becomes acidic, the solubility of several dissolved species (e.g., sulfate) will increase. Mass will also be lost from the pit lake through advective outflows.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Geochemical Pit Lake Model Development and Inputs A geochemical model was developed in the publicly available speciation and mass transfer code PHREEQC v.3 (Parkhurst and Appelo 1999) to evaluate pit lake water quality if mining stopped at the end of the PAG placement in the East Management Pond (EMP) in 2029. It was assumed that it would take 15 years to resume operations and all pit wall surfaces that were not covered prior to Year 8 would remain uncovered during this period. Water balance modelling indicates that a lake will form in the mined-out pit if operations were to cease in Year 8 of the mine plan. Based on an average climate scenario, the open pit will require 15 years to reach its maximum storage capacity of 34 Mm3 from pit wall runoff, groundwater inflows, direct precipitation, and other upstream catchments such as non-contact runoff and backfill seepage. Once the pit lake has reached its maximum water storage capacity, approximately 450,000 m3/year is modelled to discharge to the West Management Pond, which eventually would discharge to Goathorn Creek on top of the regular discharge from the Tenas Project. The geochemical model was developed to account for mixing of water flowing over the different zones of the pit walls, as well as the mixing of different water sources within the pit lake (e.g., groundwater inflows, etc.) The following assumptions were included in the water balance model to simulate these conditions: Catchments in the water balance model (SRK 2025b) for 2029 (Year 8) were assumed to be constant for the remainder of the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					scenario simulation, as mining is assumed to have stopped. Water from the Tenas Control Pond and the unimpacted catchment captured by the channel C02 around the East Management Pond would be diverted towards the pit lake during freshet, instead of into Four Creek, to expedite flooding of the pit to minimize oxidation of exposed wall surfaces. Groundwater inflows were considered constant based on prior groundwater modelling (SRK 2024b). The water quality model was set up using annual timesteps over the shut-down period of 16 years. At each timestep, inflows to the pit were assigned a source term water quality and mixed based on their relative proportions using Equation 1 (EQ1): $C_{lake} = \frac{(V_{lake,t_i} \times C_{lake,t_i}) + \sum_{i=1}^n [Q_i \times C_i - C_{lake,t-1} \times Q_{out}]}{(V_{lake,t_{i+1}}) - E_{lake,t_i}} \quad \text{Eq 1}$ Where: Clake: predicted concentration in the pit lake Vlake, ti: volume of the pit lake at time i Vlake, ti+1: volume of the pit lake at the subsequent timestep Elake, ti: evaporation from the pit lake at time i Ci: concentration of each inflow to the pit lake at time i Qi: inflow volume to the pit lake from input source i Clake,t-1: concentration of the pit lake at the previous timestep Qout: outflow from the pit lake Following mixing, supersaturated mineral phases were identified and selected for equilibration in the model based on commonly observed secondary mineral phases at mine sites (SRK 2024a). Sorption to ferrihydrite was considered using the default values of Dzombak and Morel (1990) which may limit parameters that

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					form oxyanions (e.g. arsenic and selenium) and other trace elements from persisting in solution, should ferrihydrite precipitate in the pit lake. The lake was assumed to be fully mixed and in equilibrium with the atmosphere under oxidizing conditions. To account for this in the model, the redox potential (Eh) was fixed at 550 millivolts (pe=10). After each timestep, the solution was saved and brought forward to the next timestep as the input for existing lake chemistry. Exposed wall rock surfaces will produce oxidative load that will be flushed by meteoric water. An annual wall drainage water quality was estimated by calculating the mass released from each stratigraphic zone using Equation 2: $C_{j,t} = (L_j \times M_t) / Q_t$ Eq 2 Where: C_{j,t} is the concentration of parameter j at time t L_j is the scaled field barrel release rate of parameter j M_t is the cumulative reactive mass of rock exposed along pit walls at time t Q_t is the volume of water in contact with the pit walls at time t prorated to the surface area of each zone The predicted water qualities for each stratigraphic zone were subsequently mixed in their relative proportions determined based on the site wide water balance model. As noted above, SRK (2024c) indicates that PAG rock will produce acidity after neutralizing minerals have been consumed by acid produced through sulfide oxidation. The timing to onset of acidic conditions

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					is dependent on the available neutralization potential and rock sulfide concentrations and is variable by zone (see SRK 2024c). In the wall rock runoff source term derivation, all PAG zones were assumed to become acidic after four years. This represents the minimum time to acid onset for the average bulk properties of PAG rock in Zone 4 (SRK 2024c) and provides a conservative estimate of the wall rock runoff since the timing to the onset of acidic conditions is longer for all other stratigraphic zones and these are therefore assumed to become acidic much sooner than they would in reality. The predicted wall rock annual concentrations using Equation 2 were subsequently equilibrated using the geochemical modeling code PHREEQC to evaluate if the concentrations would be constrained through precipitation of secondary minerals and adsorption surfaces. The model was set up to calculate water quality for the following constituents: General Chemistry: pH, alkalinity Major Ions: calcium, magnesium, sodium, potassium, sulfate, chloride Trace Elements (dissolved): aluminum, antimony, arsenic, barium, boron, cadmium, chromium, cobalt, copper, iron, lead, lithium, manganese, mercury, molybdenum, nickel, phosphorus, selenium, strontium, thallium, tin, uranium, vanadium and zinc. Total metals concentrations were calculated based on the assumption of a maximum TSS discharge of 35 mg/L (SRK 2024a and SRK 2025b), and proportions of TSS comprised by various elements based on whole rock analysis for non-PAG and PAG rock. Total element concentrations were calculated by adding

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					dissolved and particulate concentrations. The following additional inputs and assumptions were included in the pit lake geochemical model: A damaged rock zone depth of 2m and a fracture frequency of 10% was used to calculate the reactive mass from blasted surfaces. A damaged rock zone depth of 0.1m and a fracture frequency of 10% was used to calculate the reactive mass load from free dig areas. Water balance model flows recharging the pit lake (i.e., direct precipitation, pumped flows from TCP, unimpacted catchment runoff from channel C02) were based on an average climate scenario (SRK 2025b). Yearly average water quality model results for Tenas Control Pond (in 2029) (SRK 2025b) were used to represent the quality of water pumped from the Tenas Control Pond to the pit lake. Background surface water and groundwater quality for unimpacted catchments and groundwater inflows (SRK 2025b), respectively, were used to represent the quality of these sources to the pit lake. Backfill inflow and load were not considered in this scenario as it was considered insignificant (no seepage yet from backfill, and small amount of rock volume in backfill) Load from talus on the pit benches was not included in the model. An alkalinity of 75 mg/L was assumed for non-PAG rock pit wall runoff, as well as for the Tenas Control Pond and C02 inflows. The fully-mixed equilibrated concentrations were modelled

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					between 2029 and 2045 (16 years in total). Pit Lake Model Results The pit lake model results show that the pit lake water does not become acidic after 16 years, despite the acidification of the PAG zones in the pit wall. This is due to the relatively low contribution of PAG zones (30%) in the total pit wall runoff inflow. Additionally, the proportion of wall rock runoff to other pit lake inflows decreases from 20% to less than 10% as the pit lake floods. After 16 years, concentrations of most parameters begin to reach steady-state. An increase in concentrations of sulfate as well as some metals were observed over the modelled period, such as iron, cadmium, cobalt, dissolved nickel and zinc, due to the acidification of the PAG zones in the pit wall. Other metals decreased over time (e.g. arsenic from sorption to precipitated ferrihydrite). Copper and aluminum also decreased over time, though the decrease in concentrations was less pronounced than for arsenic. pH remained around 8.5 throughout the simulation, with a slight decrease (<0.2 pH units) over time, which would be explained by the acidification of the pit wall runoffs in Year 4 of the Pit Lake model. Trends over time for all dissolved and totals parameter concentrations can be found in Attachment OW-048-1. The predicted pit lake water quality in 2045 (Year 16 of the Pit Lake model simulation) is presented in Table 1 6. Predicted concentrations are compared against water quality guidelines for Goathorn Creek since this will be the tributary the lake will be dewatered to when mining resumes. The following constituents were screened to be parameters of concern (POCs) based on the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					comparison to water quality guidelines in Goathorn Creek (Table 1 6): sulfate, total aluminum, total chromium, dissolved cobalt, total iron, total molybdenum, dissolved nickel, total selenium, total thallium and dissolved zinc. These parameters had been identified previously as POCs in the Best Achievable Technology Assessment (BAT) [SRK 2025d] . The source of these parameters is the acidification of the PAG zones in the pit wall after four years of being left exposed. However, because of the small contribution of pit wall runoff to the total inflows, the pit lake water remains neutral (pH ~8.5) throughout the simulation. Pit Lake Dewatering Evaluation For operations to resume, the pit lake would need to be dewatered. To evaluate the impact of dewatering on Goathorn Creek during the open water season, three different dewatering scenarios were included in mass balance calculations with the following inputs: - Seasonal background 50th percentile concentrations for Goathorn Creek (open-water season [SRK 2025b]) - Water quality model results for the pit lake in 2045 (Year 16). - Pre-mining Goathorn Creek flows calculated by the rainfall-runoff model in the water balance (SRK 2025b) - Four different pit lake discharge rates (4 scenarios) of 5,000, 10,000, 15,000, and 30,000 m3/d during the open-water season (May until October) Model results for the above modelled scenarios are summarized in Table 1 7 to Tabe 1 11, and represent the maximum monthly concentration after mixing with streamflow in Goathorn Creek.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					The model results showed a few exceedances of water quality guidelines in all four discharge rate scenarios, including dissolved cobalt, dissolved copper, dissolved nickel, total selenium, total thallium, and dissolved zinc. Of note, the dissolved copper exceedance is expected to be driven by high background concentrations, as highlighted by SRK (2025c), and the discharge from the pit lake contributes very marginal load to the creek (i.e. less than 1% of load in the stream). The only other exceedance that occurs for all months during the open water season is dissolved cobalt (under the highest discharge rate of 30,000 m3/d), but the remainder of the exceedances are expected in the fall, mainly in September, when dilution capacity is reduced. Detailed exceedances for each month are provided in Table 1 8 to Tabe 1 11 for each discharge rate scenario. These results indicate that a variable discharge rate would be preferred to minimize any exceedances during the open-water season. A detailed discharge management plan would be developed, and the discharge rate at which the pit lake is dewatered would take into account the available dilution capacity in the stream, as well as available contingencies in order to resume Operations. Several contingencies are available to further mitigate these potential exceedances: - Variable discharge rates, with increasing discharge rates during peak based on available dilution capacity in the stream. - Use dilution from other sources, such as water from TCP, as well as unimpacted water from C02 channel to mix with the pit lake effluent to lower the impact of the dewatering discharge from the pit lake into the stream.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					- In the very unlikely possibility that the pit lake became acidic, despite this model scenario results, lime could be considered to manage pH and other problematic metal concentrations. As requested by OW, TML will discuss appropriate incorporation of the results of forthcoming information related to additional Project scenarios to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-049	174	App Pa- Section 2.7 (incorrectly listed under IR 154 and 164); SRK 2022d (Section 2.1 and 4.4)	Discharge management Plan - Calcite Precipitation 1. What are the uncertainty and gaps around the current assessment that calcite precipitation is not expected to occur downstream of the proposed project footprint based on current observations and baseline concentrations? Please describe how the baseline observations and related conclusions relate to the projected load from the mine and propose recommendations to address these uncertainties	1. The response to the IR states that the estimated SI do not suggest calcite precipitation, but detailed discussion is not in the reference. They do not specify what additional monitoring data is required for site-specific calculation of site-specific SIs for calcite. Is TML referring to monitoring data from this post-project operations, or baseline data? It is unclear where in the referenced SRK (2022d) document they specifically address calcite, as the term “calcite” only appears once in the document. TML must update the Discharge Management Plan and provide further information on how operation and a post-closure increase in conductivity in ponds and the receiving environment will affect the SI for calcite and predictions for precipitation. 2. Higher pCO₂ in groundwater will be more likely to precipitate calcite at possible groundwater	Telkwa Mining acknowledges the comment. Please see Attachment OW-049-1. 1. It appears an incorrect reference was provided in the original response since a detailed evaluation of calcite precipitation was documented in SRK (2022) and calcite is mentioned multiple times throughout the intended reference. This documented is titled “Tenas Project – Calcite Precipitation Evaluation” and is provided in Attachment A of Attachment OW-049-1. A detailed discussion of the calculations is provided in Section 3 and a discussion of the receiving environment results is provided in Section 4.4 (Calcite Precipitation Within Receiving Waters) and Section 5 (Summary and Recommendations). SRK (2022) indicated that downstream receptors are theoretically supersaturated with respect to calcite (i.e., SI_{calcite} > 0) but there is no visible evidence of calcite formation in these receptors. This means the site specific SI_{calcite} must be > 0 for calcite to form. A site-specific SI_{calcite} can be used as a predictive value to determine if calcite will form in the future, or

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			and gaps. 2. Please update the calcite conceptual model provided in App 13.5K to included seepage pathways through groundwater or provide a rationale for its omission. 3. Provide clarifications on the mechanisms and likelihood of calcite precipitation in the immediate downstream environment including all pathways (i.e., surface and groundwater) below end-of-pipe discharge location in Goathorn Creek. 4. Provide details of the calcite monitoring and management plan to prevent onset of calcite precipitation downstream of the project discharge and contingency measures to be implemented if specific triggers on the mine site are reached.	seepage locations (contact with atmosphere). Some accounting for this should be included in the conceptual model. 3. Within the referenced SRK 2022d (Tenas Project Water and Load Balance Modeling Report REV1), we cannot find discussion of calcite precipitation, including mechanisms, contributing factors, predictions, etc. The response to the IR states that the estimated SI do not suggest calcite precipitation, but detailed discussion on this topic is not in the reference. According to the IR response, “predictions provided in SRK (2022d) indicate that calcite is not expected to form in downstream tributaries since predicted alkalinity, calcium and magnesium concentrations are like existing conditions”. However, there are multiple examples of increases in alkalinity and magnesium (in particular) in the load model. Therefore, TML must explore conditions in terms of potential for calcite precipitation. 4. There is no plan, other than including calcite in the surface water quality monitoring program. If calcite formation is observed, then they will develop a mitigation plan. This plan will likely include mitigation using antiscalants. The proponent does not discuss this option further but	in other tributaries. A site specific SI calcite can be derived by using surface water quality monitoring results. Monitoring results are needed in multiple locations where calcite precipitation is occurring versus not occurring to converge on the site-specific value when calcite formation occurs. This data becomes available during the operations phase of the Project. 2. SRK agrees that seepage will equilibrate with atmospheric gases when it daylights and this has the potential to result in supersaturation and the precipitation of calcite at these locations. This process is already included in the conceptual model. Please see the third paragraph of Section 2.1 of Attachment A of Attachment OW-049-1. SRK understood the original request was to account for precipitation along the groundwater pathways. In the context of the Tenas project, this is not expected to occur because the groundwater pathways are not in equilibrium with atmospheric gases and based on experience at other coal mines in British Columbia, calcite precipitation occurs after the seepage has equilibrated with atmospheric gases in surface water and not in groundwater. 3. The information requested is provided in the section referenced in response 1 of this information request response. 4. Telkwa Mining plans to develop a calcite monitoring and management plan. The plan will consist of evaluation of saturation indices at downstream monitoring locations during the Operation Phase and visual inspection of streambed sediments for evidence of calcite precipitation. If calcite precipitation is identified, Telkwa Mining will submit Mine’s Act

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				should include considerations and possible impacts and interactions of the use of antiscalant for reducing calcite precipitation considering the high background conditions of aluminum in these watersheds	and Environmental Management Act permit amendment applications to implement treatment to prevent calcite from precipitating. Antiscalant addition to the water entering the Tenas Control Pond is the likely treatment technology as it is currently being used with success at other mine sites in BC. Infrastructure will be present at the Tenas Control Pond for the addition of flocculant/coagulants to react to TSS and this infrastructure will be designed and constructed to also allow for the addition of antiscalant. If treatment for calcite is required, Telkwa Mining will submit Environmental Management Act (EMA) and Mine's Act (MA) permit amendment applications to the Ministry of Environment & Parks (ENV) and the Ministry of Mine's and Critical Minerals (MCM) to use antiscalant. An evaluation of the effects of antiscalant on downstream receptors is a requirement of the permit amendment application. This will include an evaluation of the effect of antiscalant to surface water and the influence of how preventing calcite from precipitating will change dissolved constituents. However, calcite is known to co-precipitate with divalent cations since they substitute for calcium (a divalent cation) in the crystal lattice during mineral precipitation. Aluminum is a trivalent ion and therefore will have a lower preponderance to be incorporated in the calcite. Therefore, treatment of calcite is expected to result in limited changes to aluminum concentrations.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Telkwa Mining will provide an updated discharge management plan during the permitting process for OW and regulatory agencies to review and provide feedback on. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to potential calcite precipitation to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-050	181	Appendix Q Section 2.4.2.2.a	Dam Safety and Analysis b. Indicate what evaluation of possible environmental impacts due to the release of the contents of the North, West or East Management Ponds was used as a basis for selection of Consequence Classification. The environmental impacts should be consistent with the current understanding of the project (PAG tailings, etc.) and include appropriate references to	Given the likelihood of major long-term deterioration of critical steelhead spawning habitat in Tenas and Goathorn Creeks, a 'Very High' risk classification should be used for a breach of the North Dam or Tenas Dam.	Telkwa Mining acknowledges the comment. Please refer to IR response for 181 in Attachment OW-050-1. Telkwa Mining clarifies that all dams have now been reclassified with an "Extreme" risk classification, which is the highest classification available under the Canadian Dam guidelines. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to dam classification to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			the sources of information considered.		
OW-051	498	Appendix L, page 1-2	The Tenas Coal Project does not consider the environmental flow needs (EFN) of these ecosystems	The Project addressed EFN risk and calculated for each downstream node based on modelled discharge and project water use, but the Proponent hasn't described how/if they will manage flows to avoid high risk levels and maintain environmental flow needs (reduction of <10% of mean average by season) during operation. Please provide this information. To help OW better assess how TML is protecting the Environmental Flow Needs, provide details on if and how, TML will manage flows to avoid high risk levels and maintain environmental flow needs (reduction of <10% of mean average by season) during operation.	The Project addressed EFN risk and calculated predicted changes in average flows for each downstream node based on modelled discharges and Project water use. Additionally, Telkwa Mining will carry out robust monitoring programs to verify actual effects of the Project compared to modelled values. Four Creek at the most northerly prediction node may have water flow reductions greater than what fish habitat can sustain based on current information. However, Telkwa Mining will continue during the permitting phase to develop a detailed application with compensation and fish habitat loss. This will be provided to the OW for review. For other nodes associated with Four Creek the modelled flow reduction is less than the provincial guideline of 10% of where effects to fish habitat are expected. However, Telkwa Mining will have the ability to pump water from the Potable Water Storage Pond during potential low flows in summer and winter to ensure reductions due to the Project stay less than 10% to support fish habitat in Four Creek. This will be supported by a real time flow monitoring system that will be installed in the same location where the culvert that blocks fish passage upstream. Furthermore, SLR will be completing an updated EFN Assessment approach that will include a review regarding if/how flow reductions will be managed to mitigate potential effects to

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					aquatic environments. As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to EFN to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent Project Development processes or incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-052	500	Appendix L- Memo IR responses ITT498, 500-504, and 520 Palmer	How can TC monitor and offset for loss of fish production when they haven't measured it?	Fish abundance estimates for Tenas Creek and Goathorn Creek have not yet been reported. TML must provide fish abundance estimates for Tenas Creek and Goathorn Creek.	It is important to clarify the distinction between fish production and fish abundance. Fish production - refers to the rate at which new fish biomass is generated within a population over time, primarily through individual growth and reproduction. It provides insight to how rapidly a population is replenishing itself. Fish production is a dynamic and complex parameter and is best assessed using variables that influence production – such as fish abundance and food availability.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Food availability can be partially assessed through abundance of benthic invertebrates. Benthic invertebrate surveys were presented in the Project’s baseline report (Attachment OW-052-1). Fish abundance - represents the number of fish present in a specific area at a given time, offering a snapshot of the status of the population. To supplement the information presented in the EAC application, an additional fish abundance monitoring program in Tenas Creek and Goathorn Creek will be completed in 2025. This program is comprised of one representative site per reach in each creek and will utilize three- pass depletion electrofishing to calculate abundance estimates of key species. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish abundance to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-053	501	Appendix L- Memo IR responses ITT498, 500-504, and 520 Palmer	Offsetting projects have a documented 63% failure rate, how will TC ensure that theirs is not one of those?	The conceptual offsetting plan does not provide sufficient information to give confidence of its feasibility and effectiveness at offsetting predicted HADDs. To address these issues, OW recommends that TML conduct more studies to accurately map where and how fish habitat is being used, especially for trout species. This will include analyzing how decreasing winter baseline flows by 2.7% (Goathorn), 7.6% (Tenas) and 24% (Four) will impact those population-limiting habitats, and how exceeding water quality guidelines in Four and Tenas Creek will further degrade the available habitat. Additionally, TML should explore the feasibility for an alternate location for planned offsetting activities away from the 1.5 km section of lower Goathorn Creek, which is already very high value steelhead spawning habitat. Instead, plan to improve a lower quality habitat, such as: • Creating additional overwintering habitat and addressing connectivity issues for Four Creek to restore damage from logging and road building; • Adding additional off-channel habitat to lower quality and heavily logged reaches of upper Goathorn Creek and its tributaries; and/or	Department of Fisheries and Oceans (DFO) Harmful Alteration Destruction and/or Disruption (HADD) permit applications for Four Creek, Tenas Creek, and Goathorn Creek, and potential offsetting plans will be provided to OW for review and comment prior to submission to DFO. Telkwa Mining encourages the OW to become involved in field assessments and the development of potential fish habitat offsetting options for Goathorn Creek, Helps Creek, and Four Creek during the summer 2025 field program. Under the Fisheries Act, proponents are required to provide a Letter of Credit to guarantee the implementation of offsetting measures for fish habitat. The Letter of Credit is provided to Fisheries and Oceans Canada, and the proponent remains responsible until it is confirmed that the offsetting goals have been fully met. These measure, once implemented, must be monitored over several years to ensure they are effective and sustainable. An updated offsetting program will be shared and developed during the permitting process that will aim to: • Create additional overwintering habitat and addressing connectivity issues for Four Creek to restore damage from logging and road building;

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				Addressing severe habitat impacts due to agriculture in Helps and Hubert Creeks.	• Add additional off-channel habitat to lower quality and heavily logged reaches of upper Goathorn Creek and its tributaries; and/or • Addressing severe habitat impacts due to agriculture in Helps Creek. Any potential offsetting will be approved by DFO and designed in collaboration with the OW for indigenous knowledge and input, as well as professional biologists and professional engineers/geoscientists that are experienced in habitat restoration. This will occur during the permitting process. Part of the design process will involve conducting studies and analysis to characterize physical processes that pose a risk to offsetting (e.g., flood magnitudes, sediment transport dynamics, groundwater-surface water interactions). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish habitat offsetting to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-054	502	Appendix L- Memo IR responses ITT498, 500-504, and 520 Palmer	Who will manage WQ and structural issues after the 25-year post-closure period?	None	Thank you. Telkwa Mining acknowledges that the comment is closed, and no further response is required.
OW-055	503	Appendix L- Memo IR responses ITT498, 500-504, and 520 Palmer	Most of the data on fish community and habitat usage is from the 1980s, and their own data shows that it may have changed. Why didn't they survey more than 9 sites in two years?	There have been insufficient modern surveys to determine the importance of the Project Area to Chinook salmon, pink salmon, bull trout, coho salmon, and steelhead. TML must conduct sufficient additional surveys to determine the importance of the Project Area to Chinook salmon, pink salmon, bull trout, coho salmon, and steelhead.	The comment raised regarding the apparent discrepancies between historical and current fish community data within the Project area is acknowledged. While it is true that Chinook Salmon (<i>Oncorhynchus tshawtscha</i>), Pink Salmon (<i>Oncorhynchus gorbuscha</i>), and Bull Trout (<i>Salvelinus confluentus</i>) were not observed during recent surveys, this absence should not be interpreted as definitive evidence of a shift in community composition or the loss of these species from the system. These species are anadromous which means that their presence in freshwater systems is typically limited to specific life stages – primarily adult spawning migrations. The timing and frequency of these migrations can vary significantly by species and watershed. For example, Pink Salmon exhibit a strict two-year spawning cycle, meaning that surveys conducted in off- cycle years would not detect their presence. Similarly, spawning runs can be missed if surveys do not align precisely with the timing of fish migration and spawning activity. Therefore, the lack of recent observations is more likely attributed to survey timing and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					interannual variability rather than a true absence of these species. There are no known barriers between the Telkwa River, Goathorn Creek, and Tenas Creek that would prevent fish passage. Therefore, it remains reasonable that these systems continue to provide accessible habitat for anadromous species, including Steelhead (<i>Oncorhynchus mykiss</i>), Bull Trout, Chinook Salmon, and Pink Salmon. It is understood that additional data is being requested to further characterize the presence and habitat use of fall-spawning salmonids. Even though the data in the Application is sufficient for the EA process, Telkwa Mining has planned a targeted fall spawner survey program in 2025. This program will include systematic bank walks throughout the spawning window for Chinook Salmon, Pink Salmon, and Bull Trout. Site selection for these surveys will be informed by the results of the proposed summer habitat assessments, ensuring that efforts are focused on areas with the highest potential for spawning activity. It is important to note that Steelhead spawning occurs in the spring and will therefore require a separate survey. However, given the low success rate of previous spawning surveys, Telkwa Mining believes it is more appropriate that a spawning habitat survey be conducted instead.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to modern fish surveys to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project.
OW-056	504	Appendix L- Memo IR responses ITT498, 500-504, and 520 Palmer TML IR Response - Palmer_Steelhead BCEAO IR Response_2024 TML IR Response - Palmer_Tenas 2023 Steelhead IR_Nov 2023_v0.3	Where is critical steelhead spawning areas in the project area, and how will they protect them?	Steelhead critical spawning habitat has not been identified.	The Steelhead Memorandum (Palmer 2024a), Attachment OW-022-1 concludes that Steelhead (<i>Oncorhynchus mykiss</i>) spawning likely occurs in the lower reaches of both Goathorn and Tenas Creeks. This also aligns with previously reported data within the Application from Bustard. The concerns raised regarding the analysis presented in Palmer (2024a), Attachment OW-022-1 are acknowledged, and it is important to note that the report does not assert the absence of either life history type within these systems. It is maintained that the presence of Steelhead in Goathorn and Tenas Creeks should be assumed, given the absence of barriers to fish passage from the Telkwa River into these creeks. To supplement the current information and data and to respond to the OW's request to identify areas of potential Steelhead spawning habitat with in Goathorn and Tenas Creeks, additional spawner surveys that focus on identifying key Steelhead and Rainbow Trout spawning habitat features will be conducted in

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					2025. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to steelhead critical spawning habitat to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. Since the information is forthcoming, it will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the development of the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-057	NEW	Engagement and Effects Assessment	NA	Moving forward, TML should commit to more meaningful integration of Wet'suwet'en knowledge and concerns in the EA and to more clearly explain how input and knowledge from OW/Wet'suwet'en will be carried into the assessment and project planning.	Telkwa Mining acknowledges the comment. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-058	NEW	Engagement and Effects Assessment	NA	Provide responses to all outstanding Wet'suwet'en information requests such that all gaps and issues are meaningfully and accurately addressed.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-059	NEW	Engagement and Effects Assessment	NA	Establish a more robust and consistent co-managed Issues Tracking Table where all Wet'suwet'en concerns and issues can be logged and carried forward in a systematic way as the assessment progresses.	Telkwa Mining acknowledges the comment, Telkwa Mining is will use this tracking table that was co developed by the OW, Telkwa Mining, and various consultants.
OW-060	NEW	Engagement and Effects Assessment	NA	Identify VCs and impacts that are specific to Wet'suwet'en.	Telkwa Mining acknowledges the comment. Please refer to Attachments OW-060-1 and OW-060-2 for a summary of Valued Components (VCs) and impacts that have been communicated to Telkwa Mining by the OW since the Tenas Project's BC Environmental Assessment Certificate Application process started in 2017. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-061	NEW	Engagement and Effects Assessment	NA	Analyze impacts holistically so that any significant linkages between VCs and impacts meaningfully considered in the assessment.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-062	NEW	Engagement and Effects Assessment	NA	Ensure all impacts to Wet'suwet'en values are meaningfully considered in the context of cumulative pressures. This includes considering how the current baseline has been, and will be,	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-062-1. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				impacted by all past, present, and likely future projects and how the Wet'suwet'en values and resources may be sensitive to further pressures, including the Project. The Project itself and associated accommodation measures should be developed in consideration of this context.	informs Project design, monitoring, mitigation, and adaptive management plans.
OW-063	NEW	Engagement and Effects Assessment	NA	Adapt Project components and mitigation measures in a way that meaningfully resolves Wet'suwet'en concerns about impacts to all VCs. To this end, TML must: Develop all mitigation, offsetting, monitoring, and adaptive management and response plans for review by OW.	Telkwa Mining acknowledges the comment. Please refer to Attachments OW-060-1 and OW-060-2 that provide the current list of proposed offsets, mitigations, and management plans for review and feedback. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-064	NEW	Engagement and Effects Assessment	NA	Provide a table that clearly presents all mitigation measures and management plans by mid-March 2025, so that the measures and plans can be considered in OW's Rights Impact Assessment (RIA). The table should present all VCs, impact pathways, and associated mitigation measures proposed by TML to avoid, mitigate, offset, or compensate for each impact. The table must be updated as engagement on mitigation measures progresses and will be used in OW's RIA to assess the effectiveness of the mitigation measures and	Telkwa Mining acknowledges the comment. Please refer to Attachments OW-060-1 and OW-060-2 that provides the current list of proposed offsets, mitigations, and management plans for review and feedback. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				the severity of any residual impacts to the priority rights identified by the Wet'suwet'en.	
OW-065	NEW	Engagement and Effects Assessment	NA	The Proponent and EAO must work collaboratively with OW to develop a clear work plan aimed at: -Achieving consensus about the significance of Project and cumulative impacts to all VCs of importance to Wet'suwet'en identified in forthcoming OW studies and engagement processes, including but not limited to the Wet'suwet'en RIA, CUS, and WWS and information related to cumulative pressures on Wet'suwet'en rights and interests.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response. Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-066	NEW	Engagement and Effects Assessment	NA	Ensuring the Wet'suwet'en Assessment and Decision-making processes adequately inform EAO's decision making processes and reporting, specifically in the EAO's assessment report and Sustainability Recommendation.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response.
OW-067	NEW	Engagement and Effects Assessment	NA	Developing Project Certificate Conditions aimed at enforcing mitigation requirements that address concerns if the Project moves forward.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response.
OW-068	NEW	Engagement and Effects Assessment	NA	The EAO must also commit to reflecting OW's findings from the RIA in the assessment report.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-069	NEW	Engagement and Effects Assessment	NA	The EAO must commit to respecting Wet'suwet'en's consent process and must not proceed with the Project unless the Houses grant consent.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response.
OW-070	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	N/A - comment only	Telkwa Mining acknowledges the comment. Please refer to Attachments OW-060-1 and OW-60-2 that provides the current list of proposed offsets, mitigations, and management plans for review and feedback. As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-071	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and	Culture and Rights	N/A - comment only	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-071-1 that provides a summary of how the OW have provided input into the Tenas Project's EA process between 2017 and 2022.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.			
OW-072	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land	Culture and Rights	N/A - comment only	Telkwa Mining acknowledges the reviewer's comment. Telkwa Mining defers to the EAO to provide a response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		and Resource Use.			
OW-073	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Specifically, the Proponent and EAO must: -Integrate existing and forthcoming information from OW and the Houses on an ongoing basis to ensure consensus about Project impacts to rights and culture and develop robust mitigation measures in advance of the EAO's effects assessment phase.	Telkwa Mining acknowledges the reviewer's comment. Telkwa Mining defers to the EAO to provide a response. Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-074	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment;	Culture and Rights	Ensure impacts to Culture and Rights identified in forthcoming OW studies and engagement processes, including the Wet'suwet'en RIA, CUS, and CWB Study, are adequately addressed.	Telkwa Mining acknowledges the reviewer's comment. Telkwa Mining defers to the EAO to provide a response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		•Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.			
OW-075	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Integrate any forthcoming information from OW reviews and from Wet'suwet'en Assessment process on TML's Public Access Management Plan to ensure Wet'suwet'en concerns are addressed and members are able to access the culturally important areas.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-033. Telkwa Mining defers to the EAO to provide additional response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-076	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Provide the information requested in IR 492 ITT IR (LWRS, ECCC) related to access to the Goathorn Creek Bridge;	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-033. Telkwa Mining defers to the EAO to provide additional response.
OW-077	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources	Culture and Rights	Ensure all impacts to Wet'suwet'en Culture and Rights are considered in the context of cumulative pressures. This includes considering how the current baseline has been, and will be, impacted by all past, present, and likely future projects and how the current practice of Wet'suwet'en Culture and Rights is sensitive to further pressures. The Project itself and associated accommodation measures should be developed in consideration of this context.	Telkwa Mining acknowledges the reviewer's comment. Telkwa Mining defers to the EAO to provide a response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.			
OW-078	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Consider impacts within a 100 m LSA and examine Wet'suwet'en traditional knowledge and any OW studies to determine sites/areas of cultural importance that could be impacted by the Project.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA into Project design, monitoring, mitigation, and adaptive management plans for sites and areas of cultural importance.
OW-079	NEW	Culture and Rights	Culture and Rights	Conduct field surveys of areas surrounding Culturally Modified Trees in the Project footprint prior to construction.	Telkwa Mining acknowledges the comment. Telkwa Mining will ensure processes are in place to identify and respond to CMTs as part of the YMB-Enhanced Heritage Resources Management Plan

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		- Section 11: Wet'suwet'en Rights and Interests Assessment; - Section 6: Visual Resources Assessment; - Section 7: Heritage Effects Assessment; and - Section 6: Land and Resource Use.			(Attachment OW-079-1), "If avoidance is not possible, prior to alteration of any post-1846 CMTs, the OW will be consulted to determine, if necessary, the preferred mitigation measures." As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-080	NEW	Culture and Rights - Section 11: Wet'suwet'en Rights and Interests Assessment; - Section 6: Visual Resources Assessment; - Section 7: Heritage Effects Assessment; and	Culture and Rights	Develop Chance Find Procedure for Heritage resources acceptable to the House Groups – including protocols and expectations for burial sites.	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-080-1 for the current DRAFT Chance Find Procedure for feedback by the House Groups and the OW.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 6: Land and Resource Use.			
OW-081	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Develop a Chance Find Procedure for Traditional Use Sites/Cultural Use Sites acceptable to the House Groups.	Telkwa Mining acknowledges the comment. See above response to comment ID OW-081.
OW-082	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests	Culture and Rights	Identify any other protocols or ceremonies that need to be respected and followed (e.g. prior to construction, in the event of a wildlife mortality etc.)	Telkwa Mining acknowledges the comment. As the Project progresses, Telkwa Mining will continue to engage with the OW to identify appropriate protocols and ceremonies to be followed during Project development.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.			
OW-083	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Identify impact pathways of concern associated with sensory impacts (sight, smell, noise, vibrations) and develop OW priority mitigations for those impacts.	Telkwa Mining acknowledges the comment. As the Project progresses, Telkwa Mining will continue to engage with the OW on proposed mitigations to appropriately support their consideration and integration into the ongoing development and implementation of management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-084	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Determine monitoring needs for Culture, Rights, and Heritage develop a monitoring plan with the proponent – including requirements for monitoring post-operations.	Telkwa Mining acknowledges the comment. As the Project progresses, Telkwa Mining will continue to engage with the OW on proposed monitoring needs so that these can be appropriately integrated into the ongoing development and implementation of management and monitoring plans. Telkwa Mining is continuing to work with the OW on reclamation and closure planning, which includes post-operations monitoring.
OW-085	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources	Culture and Rights	Incorporate Wet'suwet'en protocols and access needs into the Public Access Management Plan with a goal of protecting Wet'suwet'en Culture and Rights. TML should work with OW to determine how the restricted areas of the Project may impact travel corridors for Wet'suwet'en people.	Telkwa Mining acknowledges the comment. As the Project progresses, Telkwa Mining will continue to engage with the OW on Wet'suwet'en protocols and access needs so that they can be appropriately integrated into ongoing development and implementation of management plans and monitoring plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.			
OW-086	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Revise the Visual Resources Management plan to Wet'suwet'en-specific visual management strategies.	Telkwa Mining acknowledges the comment. As the Project progresses, Telkwa Mining will continue to engage with the OW on proposed mitigations to appropriately support their consideration and integration into the ongoing development and implementation of management plans.
OW-087	NEW	Socio-Economic Conditions:	Socio-Economic Conditions	TML must adapt Project components and mitigation measures in a way that meaningfully resolves the gaps and issues noted in this Report and in	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response. Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		- Section 5 Chapter 1: The Labour Market; -Section 5 Chapter 2: Economic Development; -Section 6 Chapter 1: Demographics; - Section 6 Chapter 2 Infrastructure and Services; -Section 6 Chapter 5: Community Well-being; and - Section 8 Chapter 1: Human Health.		forthcoming material from OW and the Houses, including potential reviews of TML responses and supplemental material, as well as the studies to be produced as part of the Wet'suwet'en Assessment process. TML must also implement Indigenous health frameworks and Wet'suwet'en-defined mitigation measures.	appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-088	NEW	Socio-Economic Conditions: - Section 5 Chapter 1: The Labour Market; -Section 5	Socio-Economic Conditions	To do this, the EAO must evaluate the effects of socio-economic and health/wellbeing changes in a way that accounts for Wet'suwet'en values, indicators, and thresholds and that uses community data to inform the analysis. Impacts to Indigenous health and wellbeing should be	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 2: Economic Development; -Section 6 Chapter 1: Demographics; - Section 6 Chapter 2 Infrastructure and Services; -Section 6 Chapter 5: Community Well-being; and - Section 8 Chapter 1: Human Health.		assessed in a holistic fashion where interactions between VCs and pathways	
OW-089	NEW	Socio-Economic Conditions: - Section 5 Chapter 1: The Labour Market; -Section 5 Chapter 2: Economic Development; -Section 6	Socio-Economic Conditions	OW requires further work to determine the following: Whether disproportionately impacted communities have been appropriately and adequately engaged; What disproportionate impacts to distinct populations will result from the Project; and How to monitor and respond to these impacts	Telkwa Mining acknowledges the comment. Please refer to Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 1: Demographics; - Section 6 Chapter 2 Infrastructure and Services; -Section 6 Chapter 5: Community Well-being; and - Section 8 Chapter 1: Human Health.		through mitigation measures and adaptive management plans.	
OW-090	NEW	Socio-Economic Conditions: - Section 5 Chapter 1: The Labour Market; -Section 5 Chapter 2: Economic Development; -Section 6 Chapter 1: Demographics; - Section 6 Chapter 2	Socio-Economic Conditions	Determine how negative effects will be considered, as it is possible for potentially negative socio-economic effects to be turned into positive effects with appropriate planning, such as funding into socio-economic programs to offset potential risks from the project. A Wet'suwet'en-specific labour market analysis should inform the development of employment targets and education and training funding commitments that may be negotiated as part of any formal agreement. A more thorough cumulative effects analysis should be used that uses a pre-contact or pre-industrial baseline and that considers all past, present, and likely future effects.	Telkwa Mining acknowledges the comment. Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Infrastructure and Services; -Section 6 Chapter 5: Community Well-being; and - Section 8 Chapter 1: Human Health.			
OW-091	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources	NA	For all Valued Components related to the natural environment, the Proponent and the EAO must: -Commit to integrating the findings of applicable Wet'suwet'en-led studies and other information sources into Project assessments, mitigation measures, and sustainability recommendations, including but not limited to the forthcoming RIA, CUS, and CWB Study, on: -Cumulative effects into Project mitigation and monitoring strategies; and -A pre-disturbance baseline that accounts for legacy impacts (which are largely discounted in the current CEA).	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and CWB Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and the OW.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-092	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to integrating the findings of applicable Wet'suwet'en-led studies and other information sources, including but not limited to information on: -Wet'suwet'en knowledge on impact pathways, significance, and mitigation measures;	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and CWB Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and the OW.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-093	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to integrating the findings of applicable Wet'suwet'en-led studies and other information sources, including but not limited to information on: -Species of cultural importance to Wet'suwet'en that are currently missing from the Proponent's assessment, including beaver, mountain goat, grouse, bog cranberry, Lowbush berry, red cedar, yellow cedar, common juniper, rocky mountain juniper, skunk cabbage, and nodding onion; -Potential changes in use by House members of species of cultural importance to Wet'suwet'en	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, Cultural Use Study, and Cultural Wellbeing Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and the OW. The Proponent remains committed to continued engagement during permitting and implementation to ensure values important to the OW and House members are considered through project design, mitigation, and monitoring.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		that are currently missing from the Proponent's assessment, including beaver, mountain goat, bog cranberry, Lowbush berry, red cedar, yellow cedar, common juniper, rocky mountain juniper, skunk cabbage, nodding onion, and grouse.	
OW-094	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Update the direct and indirect effects assessments related to caribou as outlined in greater detail in OW's responses to IRs 418 ITT IR (LWRS and ECCC). The updated effects assessment must include: -Impacts to the entire Critical Habitat area (RSA-1), including impacts to moderate and high suitability low elevation winter habitat AND Type 1 matrix habitats.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		-A clear rationale for the Proponent’s statement that the direct and indirect effects of the Project will not worsen existing conditions in disturbed areas for the Telkwa Caribou Herd, and how the loss of potential natural regeneration of disturbed areas <40 years old by 2050 is being accounted for. -Scenarios where: -The total disturbance is calculated from existing, permanent disturbances in the Critical Habitat area. All burns and cut blocks are assumed to eventually provide habitat and are not included in the total disturbance; and -The Project's total disturbance is added to the existing above disturbance. -A calculation of the area of these habitats that will be indirectly affected regardless of current caribou presence/absence. -Updated version of the effects assessment that includes the area of direct and indirect effects within RSA-1 and RSA-2-Core regardless of the current habitat disturbance status.	

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-095	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Undertake a complete cumulative effects assessment for listed birds' species	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-097-1. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 9: Avian Species.			
OW-096	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Undertake a cumulative effects assessment with more fulsome consideration of climate change and its associated additive effects.	Telkwa Mining acknowledges the comment. Telkwa Mining recognizes the importance of climate change and acknowledges the concern raised regarding its potential influence on vegetation, wildlife, avian, and terrain/soils resources. A project-specific Greenhouse Gas (GHG) analysis was completed and is included in the Environmental Assessment, which evaluates emissions in the context of BC's climate change targets. This analysis quantifies emissions, including the Project's potential positive or negative effects on carbon sinks with discussion of effects of the Project on vegetation and terrestrial resources. It discusses future scenarios and proposes mitigation measures accordingly. The vegetation, wildlife, avian, and terrain and soils Valued Components cumulative effects assessments are based on current ecosystem conditions, with consideration of habitat function and species use. While climate change is expected to affect ecosystems over time, these effects are predicted to be gradual, regionally variable, and subject to considerable uncertainty at the local scale of the Tenas Project in terms of their manifestation and the responses of these VCs to ecosystem change. The incremental contribution of the Project is not expected to materially alter regional climate-related trends, nor do the uncertain effects of future climate change alter the significance conclusions of the cumulative effects assessments,

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			which are grounded in known effects and predictable changes in ecosystem conditions. With respect to the Atmospheric Environment VC, which includes dust, noise, and other local air quality parameters, climate change is not expected to materially influence these project-related effects and the GHG analysis addresses quantification of emissions. The effects of the Project on Atmospheric Environment parameters are driven by project activities and mitigated through standard design measures, operational controls, and monitoring. As such, the cumulative effects assessment for this VC reflects the localized, short-term nature of the potential effects that are independent of the effects of climate change. Telkwa Mining has proposed mitigation measures and adaptive management strategies that allow for response to observed environmental changes over time, including those that may be attributable to climate-driven shifts in ecosystem conditions. These approaches will be refined during permitting and implementation in collaboration with regulators and Indigenous groups. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-097	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Undertake a project residual effects assessment that accurately accounts for indirect impacts on wildlife (especially for caribou) and avian species.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029, which refer to an updated assessment for caribou, including both direct and indirect effects. A comprehensive residual effects assessment for avian species, including indirect effects, was conducted, and is documented in Chapter 9 (Avian Species Valued Component; Attachment OW-097-1) of the Tenas Project's Environmental Assessment Certificate (EAC) Application. This assessment explicitly considered indirect impacts—such as habitat fragmentation, edge effects, and sensory disturbance—on migratory breeding birds, listed bird species, and raptors. These were evaluated under the “change in habitat” indicator, which includes both direct and indirect disturbance. Given that these indirect effects were fully integrated into the methods, results, and significance determination for each subcomponent, no further assessment is required at this time. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 9: Avian Species.			
OW-098	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to opportunities for House members to cooperatively undertake and participate in: pre-clearing surveys for sensitive wildlife habitats (e.g. dens, stick nests); pre-clearing surveys to allow House members access to culturally important plants and collect seeds for reclamation activities; determining the locations of western toad crossing locations and monitoring the effectiveness of mitigation measures; and adaptive management decision making.	Telkwa Mining acknowledges that the comment and welcomes the opportunity to include House and OW members to cooperatively undertake and participate in: -pre-clearing surveys for sensitive wildlife habitats (e.g. dens, stick nests); -pre-clearing surveys to allow House members access to culturally important plants and collect seeds for reclamation activities; -determining the locations of western toad crossing locations and monitoring the effectiveness of mitigation measures; and -adaptive management decision making. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-099	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to fully and appropriately offsetting impacts to the natural environment to fully mitigate project effects (e.g. loss of habitat for Species at Risk, loss of wetlands).	Telkwa Mining acknowledges the comment. Telkwa Mining will appropriately assess impacts to the natural environment to mitigate potential Project effects following guidance from Federal Policy on Wetland Conservation (Government of Canada (GoC) 1991), the Proposed Species at Risk Act Policies and Guidelines (GoC 2016) and the Policy for applying measures to offset harmful impacts to fish and fish habitat (GoC 2025). As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-100	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	For caribou, the Proponent should, in relation to the IR from BC EAO from Oct 6, 2022: -Provide all information requested in OW's attached response to the IR from BC EAO; -Commit to offset Project related direct and indirect effects on Telkwa caribou herd habitat based on the revised Project effects assessment as requested in this and other comments;	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-101	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Provide further details of the field-based assessments noted in Appendix C including, but not limited to: -The spatial extent of on the ground survey activities at each location; -The methods used to confirm / discount PEM / TEM mapping; and -The spatial extent of each PEM / TEM mapping polygon in which surveying was conducted.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029. In the Vegetation and Ecosystems Baseline Report (Appendix 4.7-A in the Project Application; Ardea Biological Consulting 2022, Attachment OW-029-2) the TEM occurred within the Vegetation Local Study Area (LSA; Project footprint + 250–500 m buffer) and PEM mapping occurred in the Vegetation Regional Study Area (RSA; Project footprint + 5 km buffer) and beyond, including the broader RSA-1 (Telkwa Caribou Herd Critical Habitat boundary). As part of the development of the TEM, 780 ecosystem plots were investigated from 1997–2019 and were used to characterize vegetation and ecosystem types (Table 3.2-2 in Appendix 4.7-A, Attachment OW-029-2). At the mine site, 445 plots were completed; 371 of these plots were completed from 2017–2019. A detailed mapping accuracy assessment was completed for TEM polygons using the methods outlined in (Meidinger 2003).

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			For more details related to the PEM/TEM, please refer to Appendix 4.7-A in the EAC Project Application, Attachment OW-029-2. Further information on additional verification of low-elevation capable winter range habitat (August 2024 fieldwork), which was classified using PEM/TEM mapping, is provided in Attachment OW-029-1. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study and further engagement into Project design, monitoring, mitigation, and adaptive management plans.
OW-102	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to undertaking further assessments of PEM / TEM mapping, inclusive of areas not identified as moderate or high suitability habitat to confirm its absence of these features, to better understand where moderate/high suitability caribou habitat may actually be present or absent. TML should undertake further discussions with ECCC, WLRS, and Wet'suwet'en to 1) ensure that the proposed scale, extent, timing, and methods of this survey are appropriate and 2) discuss other opportunities for habitat offsetting in areas without advanced regeneration.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-103	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Provide details of the further actions that will be undertaken to identify other possible high-elevation restoration offsets. OW expects this will include ground truthing additional areas, undertaking further discussions with TML, ECCC, WLRS, and Wet'suwet'en to determine the location of other possible suitable high-elevation restoration offset locations.	Telkwa Mining acknowledges the comment. Based on the work completed in September 2024, over 90% of the identified high elevation restoration offset targets were reviewed at a reconnaissance level and determined that undertaking restoration activities may cause more disturbance than allowing natural regeneration to occur on its own. Telkwa Mining reviewed the remaining 10% of high-elevation restoration candidates, with the participation of OW, during August 2025 fieldwork. The candidates surveyed in August 2025 were used to inform offsetting calculations. Further details are provided in Section 6.5

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			of Appendix 1 (Attachment OW-026-1). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the Rights Impact Assessment (RIA), Cultural Use Study (CUS), and Cultural Wellbeing (CWB) Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and OW.
OW-104	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2:	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Undertake further discussions with TML, ECCC, WLRS, and Wet'suwet'en to determine offsetting ratios that will be required for the Project that reflect the current dire context of low population levels of the Telkwa caribou herd and highly disturbed landscape that the herd occupies.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-105	NEW	Environment Section 4 Chapter 1: Atmospheric	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to providing all offsetting funds at the start of the Project, to ensure that the maximum	Telkwa Mining acknowledges the comment. Please see responses to comment ID OW-029.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		effectiveness and benefit of offsetting activities on the Telkwa caribou herd are realized.	

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-106	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to updating acoustic models to account for terrain and atmospheric conditions to assess impacts on caribou and their habitat, and include mapping showing the extent of biologically relevant thresholds for caribou (i.e. 30 Hz at 30 dB). In specific, TML must: -Provide the information requested in OW's response to 491 ITT IR (ECCC, LWRS); -Provide an updated Blasting Noise Assessment where modelled blasting sites are chosen based on the closest potential location to the RSA-2-Core habitat; -Update the maps provided in the Proponent's assessment to account for the blasting noise reassessment; and -Incorporate the lower auditory threshold for caribou into the Blasting Noise Assessment.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-032.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 9: Avian Species.			
OW-107	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Update baseline studies (opportunities should be explored for more recent baseline data collection or at a minimum, updating of habitat models based on recent disturbances).	Telkwa Mining acknowledges the comment. Based on a review of field activities that have occurred since terrestrial baseline activities were completed in 2018 it was determined by Independent Qualified Professionals that baseline data was still valid and did not required to be updated. In response to OW concerns, Telkwa Mining assessed habitat capability for caribou in the area and searched for evidence of use during September 2024 and August 2025 field programs. Habitat capability of low-elevation winter range, which was classified using TEM/PEM mapping, was assessed in 66 (5.65-m radius) plots based on site series and caribou habitat suitability and capability across the Project Footprint. The fieldwork validated the use of the TEM/PEM approach, and identified limited evidence of caribou use within the Project Footprint. Additional details are provided in Section 5.2.3.3 of Appendix 1 (Attachment OW-026-1). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the Rights Impact Assessment, CUS, and Wellbeing Study and further engagement into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-108	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Extend the time allotted for post-closure monitoring to ensure that desired restoration endpoints are met and Project predictions are confirmed (i.e. suitable habitat is restored and effects are minimized).	Telkwa Mining acknowledges the comment. Please refer to BC EAO EAC Application - Tenas Project, Section 13.0, Chapter 15.0 Reclamation and Closure Plan, May 2022, Version 1.0 (Attachment OW-063-1) . Telkwa Mining has included 29 follow-up visits over a period of 60 years to undertake post-closure monitoring to ensure that desired restoration endpoints are met and Project predictions are confirmed (i.e. suitable habitat is restored and effects are minimized). Based on the experience of Qualified Professionals this is sufficient time for this type of monitoring. Water monitoring may continue in some form for 100 years based on bonding requirements determined during development of the Project. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-109	The comment raised regarding the apparent discrepancies between historical and current fish community data within the Project area is acknowledge	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources	For Fish and Fish Habitat	Conduct sufficient additional surveys to determine the importance of the Project Area to Chinook salmon, pink salmon, bull trout, coho salmon, and steelhead.	Telkwa Mining acknowledges the comment. Please see Attachment OW-022-1. The comment raised regarding the apparent discrepancies between historical and current fish community data within the Project area is acknowledged. While it is true that Chinook Salmon, Pink Salmon, and Bull Trout were not observed during recent surveys, this absence should not be interpreted as definitive evidence of a shift in community composition or the loss of these species from the system. These species are anadromous which means that their presence in freshwater systems is typically limited to specific life stages – primarily adult spawning migrations. The timing and frequency of these migrations can vary significantly by species and watershed. For example, Pink Salmon exhibit a strict two-year spawning cycle, meaning that surveys conducted in off- cycle years would not detect their presence. Similarly, spawning runs can be missed if surveys do not align precisely with the timing of fish migration and spawning activity. Therefore, the lack of recent

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	dged. While it is true that Chinook Salmon, Pink Salmon, and Bull Trout were not observed during recent surveys, this absence should not be interpreted as definitive evidence of a shift in community composition or the	Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			observations is more likely attributed to survey timing and interannual variability rather than a true absence of these species. There are no known barriers between the Telkwa River, Goathorn Creek, and Tenas Creek that would prevent fish passage. Therefore, it remains reasonable that these systems continue to provide accessible habitat for anadromous species, including Steelhead, Bull Trout, Chinook Salmon, and Pink Salmon. It is understood that additional data is being requested to further characterize the presence and habitat use of fall-spawning salmonids. Even though the data in the Application is sufficient for the EA process, Telkwa Mining has planned a targeted fall spawner survey program in 2025. This program will include systematic bank walks throughout the spawning window for Chinook Salmon, Pink Salmon, and Bull Trout. Site selection for these surveys will be informed by the results of the proposed summer habitat assessments, ensuring that efforts are focused on areas with the highest potential for spawning activity. It is important to note that Steelhead spawning occurs in the spring and will therefore require a separate survey. However, given the low success rate of previous spawning surveys, Telkwa Mining it is more appropriate that a spawning habitat survey be conducted instead.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	loss of these species from the system. These species are anadromous which means that their presence in freshwater systems is typically limited to specific life stages – primarily adult spawning migrations. The timing				As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to modern fish surveys to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from the OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	and frequency of these migration s can vary significant ly by species and watershe d. For example, Pink Salmon exhibit a strict two- year spawning cycle, meaning that surveys conducte d in off- cycle years would not detect				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	their presence. Similarly, spawning runs can be missed if surveys do not align precisely with the timing of fish migration and spawning activity. Therefore, the lack of recent observations is more likely attributed to survey timing and				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	interannual variability rather than a true absence of these species. There are no known barriers between the Telkwa River, Goathorn Creek, and Tenas Creek that would prevent fish passage. Therefore, it remains reasonable				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	e that these systems continue to provide accessible habitat for anadromous species, including Steelhead, Bull Trout, Chinook Salmon, and Pink Salmon. It is understood that additional data is being requested to further				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	characterize the presence and habitat use of fall-spawning salmonids . Even though the data in the Application is sufficient for the EA process, Telkwa Mining has planned a targeted fall spawner survey program in 2025.				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	This program will include systematic bank walks throughout the spawning window for Chinook Salmon, Pink Salmon, and Bull Trout. Site selection for these surveys will be informed by the results of the proposed summer				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	habitat assessments, ensuring that efforts are focused on areas with the highest potential for spawning activity. It is important to note that Steelhead spawning occurs in the spring and will therefore require a separate survey.				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	However, given the low success rate of previous spawning surveys, Telkwa Mining it is more appropriate that a spawning habitat survey be conducted instead. As requested by OW, Telkwa Mining will discuss appropriate				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	incorporat ion of the results of forthcomi ng informatio n related to modern fish surveys to Indigenou s interests or Indigenou s nations into Project design, monitorin g, mitigation , and adaptive managem ent plans. The informatio				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	n will be considere d in subseque nt regulatory or Project Developm ent processes and incorporat ed as appropriat e in the operation al managem ent plans for the Project. The managem ent plans that will be in place for the				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-110	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife	For Fish and Fish Habitat	Identify critical steelhead spawning habitat before the potential risks of the project to steelhead can be determined, as per the Information Requests sent by the BC EAO on June 6, 2023; -TML must use an appropriate analysis to characterize the life histories of <i>Oncorhynchus mykiss</i> in the Project Area; the Proponent's assertion that they are, on average, a resident rainbow trout population is not supported.	The Steelhead Memorandum (Palmer 2024a, Attachment OW-022-1) concludes that Steelhead spawning likely occurs in the lower reaches of both Goathorn Creek and Tenas Creek. This also aligns with previously reported data within the Application from Bustard. The concerns raised regarding the analysis presented in Palmer (2024a, Attachment OW-022-1) are acknowledged and it is important to note that the report does not assert the absence of either life history type within these systems. It is maintained that the presence of Steelhead in Goathorn Creek and Tenas Creek should be assumed, given the absence of barriers to fish passage from the Telkwa River into these creeks. To supplement the current information and data and to respond to the OW's request to identify areas of potential Steelhead spawning habitat within Goathorn Creek and Tenas Creek, additional spawner surveys that focus on identifying key Steelhead and Rainbow Trout spawning habitat features will be conducted in 2025. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to steelhead critical spawning habitat to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 9: Avian Species.			management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-111	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4	For Fish and Fish Habitat	Provide fish abundance estimates for Tenas Creek and Goathorn Creek.	It is important to clarify the distinction between fish production and fish abundance. • Fish production refers to the rate at which new fish biomass is generated within a population over time, primarily through individual growth and reproduction. It provides insight to how rapidly a population is replenishing itself. Fish production is a dynamic and complex parameter and is best assessed using variables that influence production, such as fish abundance and food availability. Food availability can be partially assessed through abundance of benthic invertebrates. Benthic invertebrate surveys were presented in the Project's baseline report (Attachment OW-052-1). • Fish abundance represents the number of fish present in a specific area at a given time, offering a snapshot of the status of the population. To supplement the information presented in the EAC application, an additional fish abundance monitoring program in Tenas Creek

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			and Goathorn Creek will be completed in 2025. This program is comprised of one representative site per reach in each creek and will utilize three- pass depletion electrofishing to calculate abundance estimates of key species. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish abundance to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-112	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment	For Fish and Fish Habitat	With direction from OW and the Houses, conduct more studies to accurately map where and how fish habitat is being used, especially for trout species: -This will include analyzing how decreasing winter baseline flows by 2.7% (Goathorn), 7.6% (Tenas) and 24% (Four) will impact those population-limiting habitats, and how exceeding water quality	The comment raised regarding the apparent discrepancies between historical and current fish community data within the Project area is acknowledged. While it is true that Chinook Salmon, Pink Salmon, and Bull Trout were not observed during recent surveys, this absence should not be interpreted as definitive evidence of a shift in community composition or the loss of these species from the system. These species are anadromous which means that their presence

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		guidelines in Four and Tenas Creek will further degrade the available habitat; -The estimates of altered habitat identified through these analyses should be listed as a HADD and included in expanded mitigation and offsetting plans.	in freshwater systems is typically limited to specific life stages – primarily adult spawning migrations. The timing and frequency of these migrations can vary significantly by species and watershed. For example, Pink Salmon exhibit a strict two-year spawning cycle, meaning that surveys conducted in off- cycle years would not detect their presence. Similarly, spawning runs can be missed if surveys do not align precisely with the timing of fish migration and spawning activity. Therefore, the lack of recent observations is more likely attributed to survey timing and interannual variability rather than a true absence of these species. There are no known barriers between the Telkwa River, Goathorn Creek, and Tenas Creek that would prevent fish passage. Therefore, it remains reasonable that these systems continue to provide accessible habitat for anadromous species, including Steelhead, Bull Trout, Chinook Salmon, and Pink Salmon. It is understood that additional data is being requested to further characterize the presence and habitat use of fall-spawning salmonids. Even though the data in the Application is sufficient for the EA process, Telkwa Mining has planned a targeted fall spawner survey program in 2025. This program will include systematic bank walks throughout the spawning window for Chinook Salmon, Pink Salmon, and Bull Trout. Site selection for these surveys will be informed by the results of the proposed summer habitat assessments, ensuring that efforts are focused on areas with the highest potential for spawning activity.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					It is important to note that Steelhead spawning occurs in the spring and will therefore require a separate survey. However, given the low success rate of previous spawning surveys, Telkwa Mining it is more appropriate that a spawning habitat survey be conducted instead. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to modern fish surveys to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-113	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial	For Fish and Fish Habitat	With direction from OW and the Houses, explore the feasibility for an alternate location for planned offsetting activities away from the 1.5 km section of lower Goathorn Creek, which is already very high value steelhead spawning habitat. Instead, plan to improve a lower quality habitat, such as: -Creating additional overwintering habitat and	The offsetting options proposed by the OW will be reviewed and further evaluated. Telkwa Mining would like to work through options with OW during the DFO permitting process. There is concern with restoring connectivity between Four Creek and Goathorn Creek as it could potentially impact the isolated, self-sustaining population of Dolly Varden (<i>Salvelinus malma</i>) upstream of the hanging culvert in Four Creek. The Rainbow Trout from Goathorn Creek could aggressively displace the Dolly

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		addressing connectivity issues for Four Creek to restore damage from logging and road building; -Adding additional off-channel habitat to lower quality and heavily logged reaches of upper Goathorn Creek and its tributaries; -Addressing severe habitat impacts due to agriculture in Helps and Hubert Creeks.	Varden population present in Four Creek (Nonis et al. 2023, Taniguchi et al. 2000). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish habitat offsetting to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-114	NEW	Environment Section 4 Chapter 1: Atmospheric Environment	For Fish and Fish Habitat	Provide more details for the offsetting plan that are standard in offsetting plans included in the EA process: -An estimation of the area of habitat or fish	The fish habitat offsetting plan will prioritize fish species native to Tenas Creek, Goathorn Creek, and Four Creek, which may include Rainbow Trout and Dolly Varden. Potential offsetting options will undergo comprehensive review, including ground-based site investigations ecological suitability, hydrological

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		production that would be created by the proposed project for comparison to the proposed HADD; -Identify species that would be targeted by offsetting; and -Conduct ground investigations of the site to examine it for suitability for this plan.	stability, and long-term viability. The offsetting will be based on a robust estimation of the area of habitat or fish production that will be created by the proposed Project for comparison to the proposed HADD. To obtain a Fisheries Act Authorization, the offsetting plan must include a detailed, construction- ready design. This includes geographic coordinates, site plans, habitat function objectives, and a monitoring strategy to ensure the offsetting measures achieve their intended ecological outcomes (DFO 2019). Habitat loss estimates within the Project footprint will continue to be refined throughout permitting to inform the final calculation of required habitat offsetting. In accordance with federal guidance documents, a conservative offsetting ratio of 2:1 will be applied – meaning that for every 100m² of habitat lost, 200 m² of new or restored habitat must be created (DFO 2022). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish habitat offsetting to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. Since the information is forthcoming, it will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the development of the operational management plans for the Project. The management

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from the OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-115	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4	NA	Resolve misalignment of Proponent monitoring post-Project closure (50 years) and contaminant life cycles (> 100 years). Monitoring should also include tissue contaminant levels to assess safety for consumption and potential bioaccumulation.	Telkwa Mining acknowledges that the comment is closed, and no further response is required.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-116	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4	NA	Provide more up-to-date and detailed baseline information on fish and fish habitat in environmental conditions representative of typical conditions. Assumptions on impacts, or a lack thereof, to fish and fish habitat are based on extremely flawed and incomplete studies. Studies should occur in all potentially affected watercourses and occur across multiple seasons;	Telkwa Mining acknowledges the comment. Please see Attachment OW-022-1 . The comment raised regarding the apparent discrepancies between historical and current fish community data within the Project area is acknowledged. While it is true that Chinook Salmon, Pink Salmon, and Bull Trout were not observed during recent surveys, this absence should not be interpreted as definitive evidence of a shift in community composition or the loss of these species from the system. These species are anadromous which means that their presence in freshwater systems is typically limited to specific life stages – primarily adult spawning migrations. The timing and frequency of these migrations can vary significantly by species and watershed. For example, Pink Salmon exhibit a strict two-year spawning cycle, meaning that surveys conducted in off- cycle years would not detect their presence. Similarly, spawning runs can be missed if surveys do not align precisely with the timing of fish migration and spawning activity. Therefore, the lack of recent

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			observations is more likely attributed to survey timing and interannual variability rather than a true absence of these species. There are no known barriers between the Telkwa River, Goathorn Creek, and Tenas Creek that would prevent fish passage. Therefore, it remains reasonable that these systems continue to provide accessible habitat for anadromous species, including Steelhead, Bull Trout, Chinook Salmon, and Pink Salmon. It is understood that additional data is being requested to further characterize the presence and habitat use of fall-spawning salmonids. Even though the data in the Application is sufficient for the EA process, Telkwa Mining has planned a targeted fall spawner survey program in 2025. This program will include systematic bank walks throughout the spawning window for Chinook Salmon, Pink Salmon, and Bull Trout. Site selection for these surveys will be informed by the results of the proposed summer habitat assessments, ensuring that efforts are focused on areas with the highest potential for spawning activity. It is important to note that Steelhead spawning occurs in the spring and will therefore require a separate survey. However, given the low success rate of previous Steelhead spawning surveys, it is more appropriate that a spawning habitat survey be conducted instead. As requested by OW, Telkwa Mining will discuss appropriate

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					incorporation of the results of forthcoming information related to modern fish surveys to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-117	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7:	NA	Develop high quality restoration plans for assessment by OW and the Houses, including design of the plan, the selection of species, development of measurable indicators for restoration success and clearly defined objectives including ecosystem productivity. The Proponent should commit to undertake restoration activities until objectives are achieved.	Under the Fisheries Act, proponents are required to provide a Letter of Credit to guarantee the implementation of offsetting measures for fish habitat. The Letter of Credit is provided to Fisheries and Oceans Canada, and the proponent remains responsible until it is confirmed that the offsetting goals have been fully met. These measure, once implemented, must be monitored over several years to ensure they are effective and sustainable. An updated offsetting program will be shared and developed during the permitting process that will aim to: • Create additional overwintering habitat and addressing connectivity issues for Four Creek to restore damage from logging and road building; • Add additional off-channel habitat to lower quality and heavily logged reaches of upper Goathorn Creek and its tributaries; and/or • Addressing severe habitat impacts due to agriculture in Helps Creek. Any potential offsetting will be approved by the DFO and designed in collaboration with the OW to provide indigenous knowledge and input, as well as professional biologists and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			professional engineers/geoscientists that are experienced in habitat restoration. This will occur during the permitting process. Part of the design process will involve conducting studies and analysis to characterize physical processes that pose a risk to offsetting (e.g., flood magnitudes, sediment transport dynamics, groundwater-surface water interactions). As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish habitat offsetting to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-118	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4	NA	Commit to appropriate planning for contaminant areas, which requires a proactive approach to mitigating contaminant leakage (rather than attempting to mitigate once problems have been identified);	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Telkwa Mining is committed to developing detailed liner designs, construction methodologies and monitoring to ensure that the liner systems installed for the management and control ponds limit seepage to the modelled values provided in the Final Water and Load Balance Report. Please refer to Attachment OW-118-1 for the Liner Design memo completed by SRK. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-119	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4	NA	Plan for the cases of catastrophic failures, including the quantification of potential impacts to fish and fish habitat;	As part of the Tenas Project's Environmental Assessment Certificate (EAC) Application, a Dam Breach Assessment was completed by SRK (Attachment OW-119-1). The assessment modelled two critical failure scenarios (sunny-day and rainy-day) of West, North, East and Tenas Dams to identify the local and regional impacts of water and sediment released into receiving watercourses. Effects to fish and fish habitat were provided in the EA Application and included: • Scouring of channel bed and banks, • Displacement of fish, • Degradation of spawning habitat, • Release of acidic or metal-laden water and acid-generating (PAG) substrates, and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			The mapped disturbance area is estimated to be less than 10 km² and restoration is considered feasible. To address this comment from the OW, Telkwa Mining will prepare a technical memorandum during Project development. The memorandum will discuss available existing importation including fluvial geomorphology, hydrology, habitat mapping, water quality and biological monitoring to outline unplanned post-breach restoration strategies. The memorandum will also discuss potential emergency protocols that address aquatic impacts and ecological resilience. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to quantification of catastrophic failures on fish and fish habitat to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-120	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4	NA	Consider the appropriateness of water and load balance models and correct seepage migration rates and timing of peak contaminant concentrations;	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. SRK is addressing the last part of this IR related to “Consider the appropriateness of water and load balance models and correct seepage migration rates and timing of peak contaminant concentrations;”. SRK uses standard and accepted practices that integrate inputs

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			from regional groundwater models into the water and load balance model to represent the changes from mine activity to the stream flow and water quality, combining groundwater inputs and rainfall runoff model for each creek. More information on how these are linked together can be found in IR OW-038 and in Attachment OW-038-1. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-121	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2:	NA	Consider potential impacts to Wet'suwet'en health and safety through the bioaccumulation of contaminants (e.g., selenium) through aquatic food webs into non-anadromous fish such as rainbow trout.	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-121-1 which provides the Human Health Risk Assessment completed for the EAC application which indicates a low risk for Indigenous peoples health. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-122	NEW	Environment Section 4 Chapter 1: Atmospheric	Surface Water, Ground Water, and Aquatic Resources	Provide the cited document in Appendix D: "SRK 2024a" (page 16), which is missing from the end of	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		the document under "References". Appendix A-Water and Load Balance Model Report.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-039. Please refer to Attachment OW-038-1 for the Final Water and Load Balance Report. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-123	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife	Surface Water, Ground Water, and Aquatic Resources	Update the Discharge Management Plan - Calcite Precipitation document to include -How operation and a post-closure increase in conductivity in ponds and the receiving environment affect the Saturation Indices (SI) for calcite, and predictions for precipitation; -Accounting for higher pCO₂ in groundwater, which is more likely to precipitate calcite; -Further accounting for increased calcite precipitation in instances where alkalinity and magnesium in the water increase; and -A separate calcite monitoring and management plan, which considers possible impacts and interactions of the use of antiscalants for reducing calcite precipitation, considering the high background conditions of aluminum in these watersheds.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-049.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 9: Avian Species.			
OW-124	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation	Surface Water, Ground Water, and Aquatic Resources	Provide additional information and figures for the Water and Load Balance Model Report that we have not been able to locate, including: -Final figures presented in “Attachment IR 356-1 as the attachment with that name at the end of App F contains no information; -Figures for each of the requested scenarios in the IR (Tributary receiving discharge above confluence with Goathorn Creek, and Goathorn Creek below confluence with tributary receiving discharge) and projected water quality from baseline through to post-closure; -Updated figures from the WLBM report (Fig 2.2-2.4 of App 4.3) that originally showed incorrect connections of the three creeks (Four Creek, Tenas Creek, Goathorn Creek); and -TML’s response to the IR, labelled “Final EA Water and Load Balance results”, or Attachment IR 356-1.	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Please see responses to comment IDs OW-040 and OW-041. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-125	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat	Surface Water, Ground Water, and Aquatic Resources	Use climate change predictions in the understanding of potential impacts throughout the operation and post-closure periods (e.g., changes in flow and changes in stream temperature due to changes in flow and air temperature).	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Climate change is included in the Water and Load Balance model for the Project using modelled climate rate of change to precipitation and temperature as inputs to the WLBM, according to the latest IPCC report (AR6) and latest available GCMs (global circulation models), as described in Attachments OW-125-1 and OW-038-1. It also includes climate change impacts to runoff (in the streams) and evaporation. An excerpt from the report (Attachment OW-125-1) describing the work follows: “This climate change assessment was based on results from GCMs included in CMIP6 and the corresponding IPCC Sixth Assessment Report (AR6) (Masson-Delmotte, 2021).” “Climate change scenarios for RCP4.5, RCP6.5 and RCP8.5 were evaluated for the Project Area. The effects of the RCP4.5 scenario were used to generate mean annual and monthly temperature and precipitation correction factors, which also affect runoff and evaporation rates...” Climate (daily precipitation and temperature) was adjusted in the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			WLBM until the end of the model simulation (2100) with adjustment factors as described in Attachment OW-038-1. Further, climate inputs are drivers of the streamflow modeling in the water balance model, through the rainfall-runoff models for each stream. Effects of climate change on streamflow is therefore carried forward through the adjustments to temperature and precipitation. Change in temperature in the streams was evaluated in a mass balance approach, external to the WLBM, based on baseline temperature data for Goathorn Creek and assuming that temperature for the effluent water is equal to the air temperature (corresponding to the maximum air temperature from the WLBM). The maximum air temperature from the WLBM accounts for climate change. The use of air temperature as a proxy for effluent temperature is considered conservative and therefore the change in temperature recorded in the creek is expected to be conservative as well. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-126	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4	Surface Water, Ground Water, and Aquatic Resources	Resolve outstanding technical questions regarding PAG Rock management and seepage including: -If PAG rock is to be submerged prior to the onset of ARD/ML, why would seepage tailings facilities contain the products of ARD/ML?	Telkwa Mining acknowledges the comment. 1. As provided in Attachment OW-049-1, rock will oxidize prior to placement in the management pond. Stored oxidation products from weathering of the rock prior to placement in the management ponds will be flushed during placement. The flushed oxidation products can dissolve in water stored in the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		-How much seepage is expected out of tailings facilities, both in groundwater and in surface water?	management ponds. However, this is not acid rock drainage (ARD). It is weathering prior to the onset of acidic conditions. The PAG management strategy is to place rock in the management ponds prior to the onset of acidic conditions. If acidic conditions occur, this will result in increased element leaching and acidity that would require treatment prior to discharge. Once the rock is submerged and no longer in contact with atmospheric oxygen, oxidation of the rock will be very limited. This will result in limited weathering product production and prevent acidic conditions from occurring. Water covers have been used extensively at numerous mines as a successful mitigation strategy for the prevention of ARD. 2. Attachment OW-049-1 provides seepage and surface water discharges from the management ponds over the life of the Project. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-127	NEW	Accidents, Malfunctions, And Effects of	Accidents and Malfunctions	The assessment of impacts from accidents and malfunctions requires a more thorough, Indigenous-centered and community-informed	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Accidents and Malfunctions in the EAC Application consistent with the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.		analysis of the proximity and sensitivity of Indigenous values to accidents and malfunctions. This assessment also requires inputs from Wet'suwet'en to determine the sensitivity of Indigenous values using appropriate indicators, measures, and thresholds for impacts. Such values may include, but are not limited to: The assessment of impacts from accidents and malfunctions requires a more thorough, Indigenous-centered and community-informed analysis of the proximity and sensitivity of Indigenous values to accidents and malfunctions. This assessment also requires inputs from Wet'suwet'en to determine the sensitivity of Indigenous values using appropriate indicators, measures, and thresholds for impacts. Such values may include, but are not limited to: Waterbodies, including aquifers, lakes, rivers, creeks, and marine areas of value to Indigenous communities, Fish, Wildlife, Plant resources, Traditional economy and resource use, Rare ecosystems, Travel corridors, harvesting site access, and important environmental sites, Agriculture, Wellbeing, Cultural sites, Heritage resources, Governance and stewardship, Indigenous Rights.	Application Information Requirements issued by the EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-128	NEW	Accidents, Malfunctions,	Accidents and Malfunctions	Provide more information on the duration and magnitude of effects due to hazardous spills on	Telkwa Mining acknowledges the comment.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.		land and water, including science-based evidence of the duration of remediation and restoration processes for all potential spill volumes.	Please refer to EAO EAC Application, S9.0 Accidents and Malfunctions, May 2022, Version 1.0. S9.0, which provides an assessment of both the duration and magnitude of spills (Attachment OW-020-2). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-129	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Provide more community-based information on the duration and magnitude of impacts due to perceived contamination for its ability to cause avoidance and hence adversely affect traditional resource, land, and water use and rights.	Telkwa Mining acknowledges the comment from OW. Telkwa Mining undertook the assessment of Accidents and Malfunctions in the EAC Application consistent with the Application Information Requirements issued by the EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-130	NEW	Accidents, Malfunctions, And Effects of	Accidents and Malfunctions	Provide evidence of the likelihood and implications of altered terrestrial and aquatic wildlife population dynamics in the event of a hazardous spill on land	Telkwa Mining acknowledges the comment. Please refer to EAO EAC Application, S9.0 Accidents and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.		or water, and of the magnitude and duration of impacts to these resources.	Malfunctions, May 2022, Version 1.0. S9.0, which provides an assessment of both the likelihood and implication of hazardous spills on terrestrial and aquatic species (Attachment OW-020-2). Telkwa Mining undertook the assessment of Accidents and Malfunctions in the EAC Application consistent with the Application Information Requirements issued by the EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-131	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Provide a more thorough, systematic analysis of the likeliness and effectiveness of mitigation measures to address impacts from all potential accident and malfunction scenarios.	Telkwa Mining acknowledges the comment. Monitoring programs will measure the effectiveness of mitigation measures, as described within each management plan. Adaptive management plans are included that provide a strategy to apply in the event that original predictions of effects and mitigation effectiveness are not as expected. Various plans included with the EAC Application address risks related to accidents and malfunctions, including the Mine Emergency Response Plan (Attachment OW-008-1) and the Fuel Management and Spill Control Plan (Chapter 7.0 in Section 13.0, Management Plans of the EAC; Attachment OW-008-1). Note that these plans are required as part of the Mines Act/Environmental Management Act permitting process, which occurs after the environmental assessment.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-132	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Provide Statistical modelling of accident scenarios and of the likely effectiveness and duration of remediation processes.	Telkwa Mining acknowledges the comment. Telkwa Mining has conducted the assessment in the EAC Application consistent with the Application Information Requirements issued by the EAO. Additional information for the consequence of an embankment breach is provided in Appendix 1.0-AA (Attachment OW-119-1), Overview of Project Proponent Description, of the EAC Application modelling for the downstream. The release of water and materials from the Tenas Control Pond is considered the worst-case scenario, in which the volume of water released could be up to the combined maximum storage in the three management ponds. The primary portion of the management ponds have been designed with upstream and downstream slopes of H:V (slope ratio horizontal to vertical) 2.5H:1V and 3H:1V, respectively. A toe buttress structure of 5.5H:1V has been added to the management and control pond embankments on the downstream side that are higher than 6 m and it is placed at roughly 50% of the height of the main embankment. Integrated stability analyses for the management pond and Tenas Control Pond embankment structures are discussed in S1.0 of the EAC Application. The structures have been designed to meet a minimum static FOS of 1.60 versus the guideline value of 1.50 and a pseudo-static FOS of 1.05, which matches the guideline

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					value in accordance with suggested stability design criteria (Hawley and Cuning 2017). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-133	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Provide evaluation of impacts related to water flow and level in the context of climate scenarios, showing how the impacts of climate change may affect the outcomes of accidents and malfunctions.	Telkwa Mining acknowledges the comment. The design of the ponds considered both low flow and dry climate conditions using a water balance model over a long period of time. Please refer to Attachment 350-1 (OW-038-1). As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-134	NEW	Accidents, Malfunctions, And Effects of The Environment	Accidents and Malfunctions	Provide more detailed information regarding impacts in various Project phases.	Telkwa Mining acknowledges the comment. Telkwa Mining acknowledges the comment from OW. Telkwa Mining undertook the assessment of Accidents and Malfunctions in the EAC Application consistent with the Application Information Requirements issued by the EAO (2020). Please refer

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.			to Attachment OW-020-2 that explains the duration and magnitude of effects of hazardous spills on land and water and impacts in various Project phases. As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-135	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Provide evaluation of risks due to accidents and malfunctions in the context of cumulative impacts to Wet'suwet'en rights and interests	Telkwa Mining acknowledges the comment. A risk assessment was completed by Telkwa Mining in collaboration with a Qualified Professional. The assessment undertaken was consistent with the Application Information Requirements established by the EAO (2020). It included consideration of the context of the Project, which incorporates all past and present effects to date. As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-136	NEW	Accidents, Malfunctions, And Effects of The	Accidents and Malfunctions	A summary table should be provided that presents all characterizations for each of the event types and associated VC interactions, so that all characterizations can be considered together.	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-136-1 that provides the summary table requested by the OW.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.			
OW-137	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Additionally, response plans should be developed in close collaboration with Indigenous communities and should include responses and adaptive management strategies that account for Indigenous needs and perspectives. OW requires more consent-based involvement in developing environmental management and monitoring	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and CWB Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and the OW.
OW-138	NEW	General	NA	N/A - comment only	Telkwa Mining acknowledges the comment. Telkwa Mining will work with the EAO, the OW and House Groups to meaningfully address Wet'suwet'en concerns, including adapting Project components and mitigation measures where appropriate. This is inclusive of all outstanding issues and information requests

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					outlined in the OW Environmental Assessment Status Report On Telkwa Mining Limited's Tenas Coal Mine (issued March 12, 2025) and in the OW's comments on recent IR responses regarding caribou under comments IDs OW-026 and 029 and aquatic resources under comments comment IDs OW-035 to OW-056. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and CWB Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and the OW.
OW-139	NEW	General	NA	N/A - comment only	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-059.
OW-140	NEW	Appendix D - Information Requirement Response — Impact of Upgraded Recreational Access on the Telkwa Mountain Caribou Subpopulation	Recreational Access Construction of the bridge over Tenas Creek has significant potential to increase recreational access to the Telkwa mountains resulting in displacement of caribou from core habitat. This issue was pointed out to the proponent and discussed in pre-application meetings; however, I do not see	As noted in greater detail in our IR responses, we request documentation of the additional communications that occurred between TML, ECCC, and WLRS that lead to the identification and characterization of impacts and responses. We also request that this be done for all current and future IRs related to this Project as this will provide the necessary context and transparency that OW needs to track and evaluate how the Proponent is addressing OW and other intervenor concerns.	Telkwa Mining acknowledges the comment. This request was in relation to the Project Access Management Plan. In summary, Telkwa Mining did not meet with either ECCC or WLRS on this plan. Discussions were held with BC Recreation and Parks to ensure that access was maintained to Hunter's Basin for the public. In total, Telkwa Mining held three meetings with BC Recreation and Parks with one of these meetings consisting of both Parks and a representative from the not-for-profit society BV Backpackers.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			mention of it in the application. EA Information Requirement: Include a description of increased access to the Telkwa mountains resulting from mine development, recommend mitigation and assess impacts to Telkwa Caribou Herd.		
OW-141	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs. P. 2	GHG	Please revise the GHG emissions assessment to provide a cumulative estimate of total project-related GHG emissions over all relevant project phases, including: 1. Construction, 2. Operations (with expected emissions per year), 3. Reclamation and closure, and 4. Post-closure care and maintenance (as applicable). Where appropriate, clearly identify key assumptions and expected trends in emissions across project phases. Consider presenting the data graphically (e.g., a bar chart of annual emissions by year) to support clarity and interpretation.	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project planning and development. Please refer to BC EAO EAC Application - Tenas Project, Section 4.0 Environmental Affects Assessment, Chapter 1 Atmospheric Environment Valued Component, Section 6.2 for the Cumulative Effects Assessment (Attachment OW-141-1). While all phases of the Project have the potential to result in effects to the Atmospheric Environment VC, the Operation Phase is expected to have the greatest effects. Therefore, the assessment focused on the Operation Phase. Predicted effects associated with the Operation Phase encompass any potential

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					effects during the Construction, Decommissioning and Reclamation, and Post-closure phases, and are effectively captured through the assessment of the Operation Phase. Please refer to BC EAO EAC Application - Tenas Project, 4.1-B Air Quality Report. for the Air Quality modelling assumptions (Attachment OW-141-2). In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addresses the outstanding items identified related to GHG, please see Attachment OW-141-3 Sections 2.0 and 3.0 as requested by Points 1 through 4. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-142	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs, general	GHG	Please clarify whether Scope 3 emissions were considered in the GHG assessment. If they were not: 1. Provide a rationale for their exclusion and describe any assumptions regarding coal end-use. 2. Consider including a qualitative or order-of-magnitude estimate of downstream emissions (e.g., based on emissions per tonne of coal combusted for metallurgical purposes). 3. Discuss the implications of downstream	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project development. In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addressed the outstanding items identified related to GHG, please see

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				emissions for climate policy alignment, especially under evolving net-zero transition expectations and CleanBC industrial climate policy.	Attachment OW-141-3 Sections 1.3, and 2.1 which covers Alignment with CleanBC Industrial Emissions Policy. The Project aligns with provincial and national goals. as requested by Point 1. Please see Attachment OW-141-3 Section 2.3, Table 4 covers Scope 3 emissions including those from the downstream use of coal as requested by Point 2. Please see Attachment OW-141-3 Section 3.4 as requested by Point 3.
OW-143	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs, p. 2	GHG	Please revise the submission to: 1. Describe how project emissions align with the BC government's GHG emissions reduction plans for the mining or industrial sector (as applicable). 2. Identify whether the emissions from this project have been accounted for within sectoral carbon budgets or policy assumptions under CleanBC. 3. Discuss potential trade-offs or implications for other projects or sectors if this project proceeds with the current emissions profile.	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project development. In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addressed the outstanding items identified related to GHG, please see Attachment OW-141-3 Sections 1.3, 2.1, and 2.5 for context and the implementation of BC OBPS, as requested by Point 1. Please see Attachment OW-141-3, where monitoring and continuous improvement covered in Section 5.0, as requested by Point 2. Please see Attachment OW-141-3, the Project's emissions will

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					count toward the provincial total. By proactively adopting a combination of emissions reductions option 5 (Section 4.0), the Project helps manage cumulative emissions risk. The low emission intensity of the project will be used to compare other projects in the sector, as requested by Point 3.
OW-144	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs, p. 2	GHG	Please revise the submission to provide a clear and specific net-zero or decarbonization plan for the project. This should include: - Interim emissions reduction milestones (e.g., 2030, 2040), - Measures and technologies that will be implemented to reduce emissions over time, - Key decision points or updates (e.g., incorporation of new technologies or regulatory changes), - Plans for monitoring progress and adapting if targets are not met. 5. Where possible, provide this information in a dedicated decarbonization planning section or through an attached Net-Zero Transition Plan consistent with CleanBC guidance.	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project development. In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addressed the outstanding items identified related to GHG, please see Attachment OW-141-3 Section 3, Figure 6, as requested by Point 1. Please see Attachment OW-141-3 where emission reduction technologies are discussed in Section 4.0, as requested by Point 2. Please see Attachment OW-141-3 where monitoring and continuous improvement covered in Section 5.0, as requested by Points 3 and 4. Please see Attachment OW-141-3, the dedicated

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					decarbonization planning section provided in Section 4.0 and Appendix B in Attachment OW-143-1, as requested by Point 5.
OW-145	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs, general	GHG	Please revise the GHG mitigation section to include an adaptive management framework that: 1. Defines key indicators to monitor the effectiveness of mitigation measures, 2. Identifies thresholds or targets that would trigger corrective actions, 3. Describes a process for regularly reviewing and updating mitigation plans (e.g., in response to new technologies or updated policy guidance), 4. Includes engagement with regulators, Wet'suwet'en, and/or stakeholders in monitoring and updates.	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project development. In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addressed the outstanding items identified related to GHG, please see Attachment OW-141-3, Section 5.0 as requested by Points 1 through 4.
OW-146	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs, p. 3	GHG	Please revise the submission to: 1. Provide a quantitative estimate of carbon sink loss due to clearing and land disturbance, including GHGs released from soil and vegetation during project development. 2. Estimate the GHG sequestration potential of proposed reclamation activities (e.g., afforestation, revegetation, restorative agriculture), including timelines for achieving pre-disturbance equivalency. 3. Discuss the time lag between carbon loss and sequestration, and its implications for the project's overall GHG profile.	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project development. In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addresses the outstanding items identified related to GHG. Please see Attachment OW-141-3. Section 3.6 includes estimates of carbon sources and sinks including Table 8 and Figure 5 for sequestration loss and a discussion of sequestration/recovery

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				4. Consider and describe potential offset strategies, including culturally relevant offsets, to address residual or interim emissions that cannot be mitigated immediately through reclamation.	during reclamation and closure, as requested by Points 1, 2, and 3. Please see Attachment OW-141-3. Facilities that operate below their regulated benchmark may generate surplus units or credits that can be sold. Limited use of carbon offsets is also permitted for compliance, but they need to meet the requirements specified in the regulations. The Project is expected to be a covered facility under the BC OBPS, as outlined in the 2025 CleanBC Industrial Incentive Program. See Section 3.6, as requested by Point 4.
OW-147	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+)	GBA+	Please revise the submission to: 1. Add more information regarding the location of the interviews with service organizations, if there interviews were conducted on-site. 2. if the interviews were conducted virtually, revise the title from "Field Research" to "Community Outreach with Service Providers" to accurately reflect the methodology. 2. Add the information about the mission and activities of each listed organization in Table 1 on p. 6. 3. Add the titles of organizations the interviewees represent and their location.	Telkwa Mining acknowledges the comment. 1) The interviews were conducted in person at the service organization locations in Smithers and Houston. 2) Information about the activities of each organization interviewed were added to Table 1 in the Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). 3) The titles of the organization that the interviewees represent and their locations are available in Appendix A1 in the Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-2). As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-148	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 17, pp. 20-24	GBA+	Please revise the submission to: 1. Add relevant information from the interviews to the sections that rely on grey literature. 2. If no information was gathered from the interviews of a particular topic, this should be stated explicitly. 3. Supplement secondary data with interview data where applicable. 4. Indicate when no relevant information from interviews was obtained. 5. Incorporate the input from multiple interviewees consistently throughout the report where applicable.	Telkwa Mining acknowledges the comment. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that, as additional information is provided by OW, the information may inform conclusions on the Project and potentially on the proposed conditions, including management plans. The Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1) presents all information obtained during interviews where relevant, available, and appropriate. The absence of interview-based information on a particular subject indicates that no related input was available. A list of interview questions used during the field work is provided in Appendix A3 in the report provided in the Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-149	NEW	2025 03 04 LTR - TML - Transition order Schedule A	GBA+	Please add a plan for prioritizing the hiring and training of Indigenous peoples, including Indigenous women, into high-paying skilled jobs.	Telkwa Mining acknowledges the comment. Telkwa Mining will focus on equity deserving groups including Indigenous Peoples and women for additional support via mentorship and career

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		section C point 3 Effects (GBA+)		The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	discussions to facilitate moving these groups into skilled, technical, and/or supervisory positions. The support will focus on training and assigning dedicated mentors to these employees when they are employed by the Project. As the Project develops, a plan will be developed collaboratively with identified groups to ensure equity deserving groups have the best opportunities for progressing and/or obtaining skilled, technical, and/or supervisory positions with the Project. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP (Attachment OW-008-1). Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-150	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 27	GBA+	On p. 27, please add the acknowledgement of how challenges related to household duties and childcare are more exacerbated for Indigenous women. 2. On p. 27, include a plan that addresses the promotion of employment opportunities and training for women in their workforce. 3. On p. 27, add the acknowledgement that hiring and promotion of Indigenous peoples and women are the project's priorities.	Telkwa Mining acknowledges the comment. Acknowledgement of how Indigenous women experience challenges related to household duties and childcare more acutely than others is added to Section 3.1 in the Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). During Project development, a plan will be developed collaboratively with the identified groups including Indigenous

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	women to ensure equity-deserving groups understand what employment opportunities are available, including training and career progression. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP (Attachment OW-008-1). Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-151	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 28	GBA+	In the section Community Infrastructure and Services on p. 28, please add the breakdown of on-reserve Indigenous communities versus off-reserve Indigenous communities. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use	Telkwa Mining acknowledges the comment. Details of on-reserve and off-reserve Indigenous populations and infrastructure as well as services available on reserve are included in the 2022 EAC Application submission (Attachment OW-151-1 and OW-151-2). Telkwa Mining welcomes further details on the distinct challenges experienced by individuals living on-reserve compared to those living off-reserve to support appropriate information being made available to inform decisions by OW and EAO on the Project.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining is committed to working with the OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that, as additional information is provided by OW, that information may inform conclusions on the Project and the proposed conditions, including management plans.
OW-152	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 29	GBA+	Please revise the Housing section on p. 29 to be reframed in a way that addresses local/regional contexts. In addition, this section needs to include the comparison between the provinces if required. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully	Telkwa Mining acknowledges the comment. Relevant information regarding the local/regional contexts of housing conditions in Smithers, Telkwa, Houston, and Witset are provided in Section 2.5.2 in the Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the Project and proposed conditions, including management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-153	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 30	GBA+	In section Crime and Public Safety on p. 30, please add a statement that provides evidence demonstrating the lower risks associated with the absence of work camps for this project. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully	Telkwa Mining acknowledges the comment. A statement providing evidence demonstrating the lower risks associated with the absence of work camps has been added to Section 3.3 in the Revised Tenas EA Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1). Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the Project and potentially proposed conditions, including management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-154	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 31	GBA+	On p. 31, add other socioeconomic impacts related to resource extraction projects, which disproportionately affect Indigenous women, such as an increase in sex work, sexually related criminal offences, and unsafe sexual transactions. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining acknowledges the comment. Other socioeconomic impacts related to resource extraction projects on women and girls, including Indigenous women and girls, are noted in Section 3.3, Crime and Public Safety, of the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report(Attachment OW-005-1). The section identifies binge drinking, drug use, and unsafe sexual practices, increased rates of sexual assault and sexually transmitted infections as socioeconomic impacts associated with work camps and long shifts that occurred in resource communities. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward to the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the project and proposed conditions, including management plans.
OW-155	NEW	2025 03 04 LTR - TML - Transition	GBA+	The Community Health and Wellbeing section on p. 32 needs to be reframed in a way that addresses	Telkwa Mining acknowledges the comment. The local/regional context is covered in Section 4.2.1 in S6.0-C5 of the 2022 EAC

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		order Schedule A section C point 3 Effects (GBA+), p. 32		local/regional contexts. In addition, this section needs to include the comparison between the provinces if required. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Application submission (Attachment OW-155-1), where existing community health and well-being indicators such as the Community Well-being Index for Smithers, Telkwa, Houston, and Witset are discussed. Section 3.4 in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report provides analysis of Project effects on equity-deserving groups (Attachment OW-005-1). Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the project and proposed conditions, including management plans."
OW-156	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 33	GBA+	On p. 33, please revise the assessment of impacts of food security on vulnerable groups such as women and seniors by including all affected populations in the assessment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in	Telkwa Mining acknowledges the comment. The local/regional context is covered in Section 2.7.2 on Food Security in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1). The section also describes the existing conditions for low-income households, people with disabilities and people with moderate to severe mental health challenges, which could include women and seniors. Section

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	3.4.2 on Food Security in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1), identifies an increase in housing costs as a key project-related driver of food insecurity and makes a clear cross-reference to the cost-of-living effects section that precedes it. The cost-of-living section clearly identifies the vulnerable groups noted by the reviewer as being potentially at risk of food insecurity. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the project and proposed conditions, including management plans."
OW-157	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 34	GBA+	Please revise the submission to provide the contextual basis for the statement regarding socioeconomic issues experienced by Indigenous peoples on p. 34 or remove the sentence. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML	Telkwa Mining acknowledges the comment. Other socioeconomic impacts related to resource extraction projects on women and girls, including Indigenous women and girls, are noted in Section 3.3, Crime and Public Safety, of the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1). The section identifies binge drinking, drug use, and unsafe sexual practices, increased rates of sexual assault and sexually transmitted infections as socioeconomic impacts associated with work camps and long shifts that occurred in resource communities. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project. Telkwa Mining

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	recognizes that as additional information is provided by OW, that information may inform conclusions on the Project and proposed conditions, including management plans.
OW-158	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 36	GBA+	Please revise the submission to so that it includes consideration of development of a Gender and Culture Safety Plan in conjunction with the Wet'suwet'en in addition to Bathurst Resources Ltd. intersectional corporate policies. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures.	Telkwa Mining acknowledges the comment. Telkwa Mining is committed to developing a gender and culture management plan in collaboration with various equity-deserving groups including OW during the development of the Project. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-159	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 40	GBA+	On p. 40, please provide enhanced strategies for identifying and reducing barriers faced by equity-deserving groups in employment and training by incorporating implementation plans, response mechanisms, and accountability measures where gaps are identified. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully	Telkwa Mining acknowledges the comment. Enhanced strategies will be developed as part of management plan development during the development of the Project to identify and reduce barriers faced by equity-deserving groups. The plan will be developed collaboratively with identified groups, especially Indigenous Peoples, and women, to ensure equity-deserving groups have an equal, real, and identified opportunities for progressing and/or obtaining skilled, technical, and/or supervisory positions with the Project. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Project Environmental Assessment Certificate. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the Project and potentially proposed conditions, including management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-160	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 41	GBA+	Please revise the submission to: 1. On p. 41, provide clarification to the statement about the incentives to Indigenous groups to encourage the development of additional housing stock/supply and elaborate on the nature of the incentives. 2. On p. 41, provide clarification to the statement about consideration of the equity-deserving populations in any housing developed by Telkwa Mining. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully	Telkwa Mining acknowledges the comment. Telkwa Mining is committed to providing \$1 million to support housing initiatives contingent on obtaining \$3 million in additional funding to assist with the same initiatives from government and nongovernment sources. Specific housing activities will be selected based on a ranking system to be developed in collaboration with local Indigenous and community groups. At least one of the criteria will be aimed at ensuring representation of equity-deserving populations in the selection process. This has been updated in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1). Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-161	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 44	GBA+	On p. 44, please include the clarification regarding the funding and its duration in the statement about developing and implementing Community Engagement Programs as part of the Socio-economic Management Plan (SEMP).	Telkwa Mining acknowledges the comment. Telkwa Mining will fund community engagement programs for employees, local communities, and other interested parties during the Construction, Operation, and Decommissioning and Reclamation phases of the Project (approximately 25 years). The community engagement program at a high-level will be part of the role profile for the Mine Manager, Indigenous Superintendent, and Environmental Coordinator. Twice a year, presentations will be delivered with various Indigenous Nations and stakeholders to provide Project updates, gather feedback, and answer questions. The same information will be posted on the Project's website and will be part of the annual report to regulatory agencies. Furthermore, Telkwa Mining will maintain an open-door policy for any groups that wish to engage with the Project. This has been updated in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1). Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. As requested by OW, Telkwa Mining will consider any

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-162	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 46	GBA+	Please revise the submission to: 1. On p. 4, include the clarification regarding the funding and its duration in the statement about supporting Telkwa Elementary and Witset School with breakfast for students during the Project Operation phase.	Telkwa Mining acknowledges the comment. Telkwa Mining will provide support and funding for breakfast programs at Telkwa Elementary and Witset School during the Project Operation phase (approximately 20 years), contingent on securing government and nongovernment partners to assist with 50% of the delivery of these programs. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. This has been updated in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report(Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-163	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 47	GBA+	Please revise the submission to: 1. On p. 47, expand the focus on training opportunities for under-represented groups by adding the training for employment advancement.	Telkwa Mining acknowledges the comment. This has been updated in the Revised Tenas Project Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the Project and potentially proposed conditions, including management plans.
OW-164	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 49	GBA+	Please revise the submission to: 1. On p. 49, clarify whether the training for women and other under-represented groups leads to permanent employment.	Telkwa Mining acknowledges the comment. Telkwa Mining is committed to providing training opportunities to women and other under-represented groups to help build skills and improve access to employment. While participation in training does not guarantee permanent employment with Telkwa Mining, the training is intended to enhance employability and support long-term career development within the industry. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. This has been updated in the Revised Tenas Project Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-165	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 54	GBA+	Please revise the submission to: 1. On p. 54, include the clarification regarding the funding and its duration in the statement about financial education programs for employees.	Telkwa Mining acknowledges the comment. Telkwa Mining will provide and fund financial education programs for employees during the Project Operation phase (approximately 20 years) to support general financial literacy, help employees and their families develop personal financial management skills, and encourage retirement planning and saving. The program is part of the overall suite of benefits provided to employees and their families up to two training sessions per employee per annum. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. This has been updated in the Revised Tenas Project Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-166	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3	GBA+	Please revise the Health and Wellness Program column on p. 58 to include the details such as funding sources and responsibility, the duration of	Telkwa Mining acknowledges the comment. Telkwa Mining will fund the Health and Wellness program during the Operation phase (approximately 20 years) of the Project as part of the overall suite of benefits provided to employees and their families

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Effects (GBA+), p. 58		time for the program to be in existence, communications plans and reporting mechanisms.	up to a maximum of \$1,200 per annum if they satisfy the requirements of the program, which, in turn, will be developed with the Joint Occupational Health and Safety Committee. This information will be part of the offer of employment to employees and annual updates will be provided to employees. As part of the program, monitoring and reporting will be developed collaboratively with the Joint Occupational Health and Safety Committee to ensure maximum value and understanding of how this program is benefitting the health of employees. Telkwa Mining 's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. This has been updated in the Revised Tenas Project Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-167	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 62	GBA+	Please revise the submission to: 1. Include a reporting requirement on how grievances are handled, responded to, and shared with Wet'suwet'en in the implementation of Grievance Redress Mechanism for workers and community members. 2. On p. 62, include more information about funding for engagement with stakeholder	Telkwa Mining acknowledges the comment. 1. Telkwa Mining will report annually on the results of the Grievance Redress Mechanism including number and type of grievances received, measures taken to resolve each issue, and their current status. The reports will be publicly available. This has been updated in the Revised Tenas Project Transition Order:

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				groups, including who is responsible for funding for engagement, the duration of it and other details, including reporting requirements and a communications plan.	Gender-Based Analysis Plus Report (Attachment OW-005-1). 2. Telkwa Mining will fund community engagement programs from the employee involved with the Project during the Construction, Operation, and Decommissioning and Reclamation phases of the Project (approximately 25 years). The community engagement program at a high-level will be part of the role profile for the Mine Manager, Indigenous Superintendent, and Environmental Coordinator. Twice a year, presentations will be held with various Indigenous Nations and stakeholders to provide project updates, gather feedback, and answer questions. The same information will be posted on the Project's website and will be part of the annual report to regulatory agencies. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. Furthermore, Telkwa Mining will maintain an open-door policy for any groups that wish to engage with the Project. This has been updated in the Revised Tenas Project Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-168	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 63	GBA+	Please revise the submission to: 1. On p. 63, include attending a culturally-relevant GBA Plus and GBV training in the list of mine manager's responsibilities.	Telkwa Mining acknowledges the comment. The management plans will be updated during development of the Project to include relevant cultural, GBA Plus, and GBV training activities. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-169	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), pp. 3-103	GBA+	Please revise the submission to include direct quotes from the interviews with service organizations where applicable.	Telkwa Mining acknowledges the comment. In keeping with ethical practice in social science research, efforts have been made to protect the confidentiality of interviewees, including the use of names. This is especially important in smaller communities, where individuals may be easily identifiable by their choice of words or the content of their statements. To respect this confidentiality, direct quotations have been deliberately avoided. In some cases, a pledge of confidentiality was an agreed condition of the interview (although it was not possible to guarantee it). Where interviewees are cited by first initial and surname in the document, Telkwa Mining has faithfully paraphrased their input based on detailed notes taken during the interview. Interviews were not recorded; therefore, direct quotes

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					are generally not available. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the project and proposed conditions, including management plans.
OW-170	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 4, p. 7	Fish, Wildlife, Caribou and People	Please revise the submission to: 1. Add Impact on Wet'suwet'en Traditional Subsistence Activities to the list of assessment of VC-specific effects on current and future generations. 2. The subsection Effects on other VCs under the section Fish and Fish Habitat should include the Effects on traditional fishing. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-170-1 for the Wet'suwet'en Rights and Interests Assessment. Telkwa Mining acknowledges that OW is still completing its RIA, CUS, Wellbeing studies, and related studies. Telkwa Mining is committed to ongoing engagement with OW to include appropriate information into Project development.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-171	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 12	Fish, Wildlife, Caribou and People	Please revise the submission to: 1. Add the section on Traditional Subsistence Activities of Local Indigenous people as a separate VC. 2. Discuss the project impacts on wildlife, fish habitat, caribou and water in the context of traditional subsistence activities, cultural practices, land use and food security. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-172	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, pp. 15-16	Fish, Wildlife, Caribou and People	Please revise the submission to include discussion on traditional subsistence activities of Wet'suwet'en in the subsection Social and Cultural Pillars of Sustainability on pp. 15-16. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-173	NEW	2025 03 04 LTR - TML - Transition order Schedule A	Fish, Wildlife, Caribou and People	Please revise the submission to: 1. Clarify how valued components were determined and if they will be refined based on the input of Indigenous	Telkwa Mining acknowledges the comment. The Project's Valued Components were determined based on documented engagement with both regulatory agencies and Indigenous

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		section C point 4 - Effects, p. 4		Knowledge holders. 2. Add "safety and security for Indigenous women, girls and gender-diverse people" to Human VCs. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Nations during the Pre-Application phase for the Tenas Project. Tenas Project Valued Components are open to refinements and/or additions based on further input from Indigenous Knowledge Holders during development of the Project.. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-174	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 10	Fish, Wildlife, Caribou and People	Please revise the submission to: 1. Add the potential change in access and use of the water sources and Wet'suwet'en peoples' ability to exercise their right to use these water sources to the list of Residual Adverse Effects. 2. Consider the potential change in access and use of the water sources and Wet'suwet'en peoples' ability to	Telkwa Mining acknowledges the comment and, as requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the Wet'suwet'en RIA, CUS, and Wet'suwet'en Well-being Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				exercise their right to use these water sources for each VC. 3. Assess the significance of this residual adverse effect for each stage of the project. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-175	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 14	Fish, Wildlife, Caribou and People	Please revise the submission to: 1. Clarify which Project Mitigation Measures and Management Plans include monitoring as a component. 2. The information about a monitoring component in Project Mitigation Measures and Management Plans should also include the information about the	Telkwa Mining acknowledges the comment. Almost all YMD-Enhanced Environmental Management Plans have a monitoring component. Mitigation measures added during the certificate development process will either be added to existing monitoring programs or have monitoring programs developed for them during the permitting phase of the Project. Telkwa Mining will report out to First Nations and the EAO on EA Certificate-

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				funding sources, the duration of funding and reporting mechanisms.	developed Environmental Management Plans throughout the life of the Project. Telkwa Mining will be responsible for funding these monitoring and reporting programs which are expected to continue through the Construction, Operation, Decommissioning and Reclamation and at least 50 years into the Post closure phase of the Project for a total of 75 years at a minimum. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-176	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 17	Fish, Wildlife, Caribou and People	Revise the statement about potential adverse socio-economic effects of labour forces for Indigenous communities, recognizing that the issue has not been fully explored. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on	Telkwa Mining acknowledges the comment and that the OW is still completing its RIA, CUS, Wellbeing Study, and other related studies. Telkwa Mining is committed to ongoing engagement with the OW to include appropriate information into Project development.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-177	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 22	Fish, Wildlife, Caribou and People 2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 22	Please revise the submission to: 1. On p. 22, consider publicly available regional growth strategies.	Telkwa Mining acknowledges the comment. The Revised Tenas Project Environmental Assessment Transition Order: Current and Future Generations Analysis Report includes publicly available regional growth strategies and plans that are relevant to LSA and RSA, such as Village of Telkwa Strategic Plan and Smithers Telkwa Rural Official Community Plan, Bylaw No. 1704, 2014, Schedule A (Attachment OW-005-2) . As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-178	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 24	Fish, Wildlife, Caribou and People	Please revise the submission to include the promotion of Indigenous peoples, women, and gender-diverse people to senior or management level positions.	Telkwa Mining acknowledges the comment and, to support this objective, Telkwa Mining will work with OW and House Groups during development of the Project to have training and processes in place to expand employment and career opportunities and identify pathways for promotion to senior or management level positions. These efforts will include specific initiatives to encourage Indigenous Peoples, women, and gender diverse people to develop their skills and training so they may obtain the necessary qualifications and build experience to enable them to succeed in mid- and senior- or management-level positions. This

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					has been updated in the Revised Tenas Project Environmental Assessment Transition Order: Current and Future Generations Analysis Report (Attachment OW-005-2). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-179	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 22	Indigenous labour market	Please develop a better understanding of local employment effects that involve Indigenous people to address the gaps noted in this comment. Please ensure any referenced or additional material addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led	Telkwa Mining acknowledges the comment and that the OW is still completing its RIA, CUS, Wellbeing Study, and other related studies. Telkwa Mining is committed to ongoing engagement with the OW to include appropriate information into Project development. As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-180	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 24	Indigenous economic development	Please develop a better understanding of Wet'suwet'en Nation entrepreneurship and business conditions and development. Please ensure any referenced or additional material addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining acknowledges the comment. Telkwa Mining has identified the following contract opportunities that Wet'suwet'en people could participate in, based on the feasibility study, which have significant values while not being equipment or equipment parts-related: -Road Construction, estimated at \$9.26 million. -Topsoil Salvage, estimated at \$12.47 million. -Processed Coal Haul, estimated at \$66.4 million. -Processed coal stockpiling and loading, estimated at \$16.75 million. -Water management infrastructure, estimated at \$18.5 million. -Seed collection for reclamation. -Environmental and geotechnical monitoring. -Security. -Employee transportation. -Planting via drone seeding and manual planting of seedlings. -Nursery development. -Reclamation Activities; and -Coal, water, and rock laboratory support. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-181	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 25	In-migration, regional demographics, economic impacts, housing impacts	Please provide information on the types of demographic effects from an influx of non-local construction and mine workers (e.g., inflation, housing). Please ensure any referenced or additional material addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining acknowledges the comment. Telkwa Mining has committed to housing the construction workforce in hotels, private residences, and campgrounds within the region, from Houston through to Hazelton, so this should not have an inflationary pressure on the local housing stock. Given the size of the construction workforce compared to the main population centres, it is highly unlikely that there will be an increase in consumer goods in the region. Telkwa Mining has also committed to temporarily housing new employees for a period of 1 to 6 months in hotels to provide adequate time to find housing in one of the three villages or the overall Bulkley Valley to commute to the Project. Finally, Telkwa Mining has committed to providing transportation to the Project from Hazelton, Witset, Smithers, and Houston with the goal of spreading the requirement of any new employees in the region over a number of communities. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-182	NEW	2025 03 03 LTR - TML - Transition order Schedule A	Infrastructure and services	Please develop a better understanding of the flows and barriers of tax revenues from regional, provincial, and federal governments to	Telkwa Mining acknowledges the comment. There are several publicly available revenue-sharing agreements between Indigenous Nations and the BC provincial government related to

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		section C points 1, 2 and 5, p. 26		Wet'suwet'en people. Please ensure any referenced or additional material addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	mineral taxes ranging from a low of 15% to a high of 35%. Telkwa Mining will advocate for a 65/35 split between the provincial government and Indigenous Nations in relation to mineral tax revenue sharing for this Project. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-183	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 27	Land and Resource Use	Please provide an analysis around the land and resource use plans of the Wet'suwet'en (e.g., territorial land and resource plans). The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and	Telkwa Mining acknowledges the comment. Telkwa Mining has requested OW to provide land and resource plans of the Wet'suwet'en for their lands where the Project is located to collaboratively incorporate this into the overall planning for the Project. Unfortunately, after several years of engagement, these are yet to be provided to Telkwa Mining. Telkwa Mining is willing to work with the OW once these plans are provided to complete

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	analysis related to this topic during Project development. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-184	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 29	Employment effects	Commit to further mitigations development that are encompassing of the broader Wet'suwet'en Nation- Consider expanding skills and employment development that is indirectly or unrelated to the Project (e.g., Wet'suwet'en administrative capacity). The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the	Telkwa Mining acknowledges the comment. The Tenas Project has many entry-level positions requiring base mine training and induction activities, which can be carried out by Telkwa Mining once people are hired. Telkwa Mining is confident that roughly 15 Wet'suwet'en members can be found to fulfill these positions given its commitment to providing transportation from local communities and not requiring a valid Class 5 driver's licence or a Grade 12 diploma as prerequisites for these positions. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-185	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 36	Economic development	Commit to further mitigations development that addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully	Telkwa Mining acknowledges the comment from the OW. Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs the ongoing mitigation and monitoring planning for the Project.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-186	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 57	Land and Resource Use	Please develop a better understanding of Office of Wet'suwet'en plans for lands extending across the Territory. Please ensure any referenced or additional material addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining acknowledges the comment and that the OW is still completing its RIA, CUS, Wellbeing Study, and other related studies. As Project development and planning progresses, Telkwa Mining is committed to ongoing engagement with the OW to include appropriate information.
OW-187	NEW	Accidents, Malfunctions,	Accidents and Malfunctions	In regard to environmental effects on the Project, TML must consider and address	Telkwa Mining acknowledges the comment. Impacts to Indigenous VCs resulting from Project impact pathways is

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.		impacts to Indigenous VCs resulting from Project impact pathways including but not limited to: • Slope stability concerns and subsequent erosion and sedimentation; • Water withdrawal from fish-bearing streams during low precipitation; and • Wildfires.	represented and explained in each VC chapter of the EAC Application. With respect to accidents and malfunctions, the reasonable worst-case scenarios identified analyzes impacts related to the specific unplanned event from an accident and malfunction. As such, slope stability related to failure of management ponds (Section 5.1), sediment releases to water (Section 5.6) and earthworks failures (Section 5.9) all address VC impacts (Attachment OW-020-2). Water withdrawal from fish-bearing streams during low precipitation is not considered an impact as a result of the identified potential accidents and malfunctions. Impacts to fish-bearing streams would be found in Chapter 3 Surface Water VC (Attachment OW 187-1). Wildfire impacts as a result of a fire or explosion is not anticipated however, mitigation measures are provided to minimize any risk of fires spreading in Section 5.11 (Attachment OW-020-2). Wildfires are addressed in the Mine Emergency Response Plan (Attachment OW-008-1). The VC receptors are the same as considered in the EAC Application. Section 2.4.1 Selection of VCs identifies Indigenous groups as a candidate VC (Attachment OW-187-2). Indigenous VCs are woven into each listed VC impact in the accident and malfunction and considered where potential unplanned events from accidents and malfunctions can occur and when interactions between these events and receptor VCs may have significant and severe effects.

Enclosure 3

NORTHERN HEALTH COMMENTS AND RESPONSES BASED ON TELKWA MINING'S RESPONSE TO TRANSITION ORDER SCHEDULE A SECTION C ITEMS 1, 2, 3, 4, 5, AND 6

Table 1: Responses to 8 September 2025 Northern Health Comments on Section 25 Transition Orders

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
1	2-Sep-25	Item 6 - The Project's greenhouse gas emissions	General	Northern Health (NH) appreciates the opportunity to provide input on the Tenas Coal EA — GHG Emissions Update for the proposed Project. We note the Project's estimated emissions — 30,939 tCO₂e annually, or 680,652 tCO₂e over the life of mine — while below regulatory thresholds, contribute to cumulative climate impacts that affect population health and the resilience of our health system. As the regional health authority serving approximately 300,000 residents across a vast geography of northern British Columbia, NH is uniquely positioned to observe and respond to the health impacts of climate change. We are committed to build[ing] a climate-resilient health system (https://www.northernhealth.ca/sites/northern_health/files/about-us/reports/strategic-service-plans/documents/northern-health-strategic-plan-2023-2025.pdf) in response to the growing health effects of climate change. NH is increasingly required to divert resources to prepare for and respond to climate-related health effects already being experienced in our region, including deteriorating air quality from wildfires, extreme heat events, flooding, and infrastructure disruptions. These risks are projected to intensify in Northern BC, placing additional strain on health services and exacerbating both acute and chronic disease burdens. Our comments reflect Northern Health's progressing and expanding work in Climate Change and Health Vulnerability and Adaptation Assessment because of mandates and a growing body of compelling evidence supporting climate and health action. We recommend the proponent (based on provincial strategies, regional reports, and emerging evidence): • Ensure alignment with provincial strategies such as the BC Climate Preparedness and Adaptation Strategy (https://www2.gov.bc.ca/assets/gov/environment/climate-change/adaptation/cpas.pdf) and the BC Ministry of Health's Risk to Resilience Report (https://climateredycbc.gov.bc.ca/pages/health). The latter emphasizes that climate change imposes significant and escalating impacts on B.C.'s communities and health system, now and into the future. There are lost lives and livelihoods, displacement, disrupted communities, and strained health services left in the wake of recent extreme heat waves, wildfires, floods, droughts, and other climate-related events. These events have also impacted supply chains, limiting access to essential supplies, health care, and medications. Delaying action comes at a high cost, as B.C.'s health system and communities will be increasingly challenged to respond to overlapping emergencies and maintain essential health functions. • Consider integrating hazard, risk and vulnerability assessments, such as from the Regional District of Bulkley-Nechako (Electoral Area A - Smithers/Telkwa Rural) (https://www.rdbn.bc.ca/application/files/7916/8609/1664/Final_HRVA_Report_EA_A-20230526SONilPEM.pdf) into planning, construction, operations and decommissioning phases to ensure long-term resilience. • While the proponent has considered the Project's potential positive or negative effects on carbon sinks, including forests, we encourage further evaluation in light of emerging evidence. A recent article by the World Resources Institute (https://www.wri.org/insights/global-trends-forest-fires?apcid=0065d91741a9a798ef87ad03&utm_campaign=wridigest&utm_medium=email&utm_source=wridigest-2025-08-26) highlights that forest fires are now a leading driver of global tree cover loss, with boreal regions—such as those in Northern BC—experiencing record-breaking fire seasons. These fires not only degrade air quality and threaten infrastructure but also compromise the carbon storage capacity of forests, potentially turning them from carbon sinks into net sources of emissions. This fire-climate feedback loop poses significant risks to both ecological and human health systems. Additional Context (from Health Canada, 2022): • Research shows that the health of Canadians has been affected by climate variability and change in recent years — both directly, when extreme heat and other natural hazards result from climate change, and indirectly, through a range of social, environmental, cultural, and economic pathways that have effects on health. • All Canadians can be affected by climate change; however, the distribution of these impacts and related health risks are not uniform. Seniors, children, racialized populations, low-income individuals, individuals with chronic health conditions, and First Nations, Inuit, and Métis peoples often experience greater health impacts of climate change.	The Tenas Coal Metallurgical project (the Project) acknowledges that collaboration with Northern Health for a climate-resilient health system an important priority. Global greenhouse gas emissions contribute to climate change and affect population health and the resilience of health systems. The Project will contribute to global greenhouse emissions; however, the potential exists to improve the resiliency of the Project through thoughtful climate change adaptation. The Project will complete a Hazard, Risk, & Vulnerability Assessment (HVRA) for the Project prior to construction. The assessment will be developed in alignment with the Emergency Management BC process to develop a HRVA and modified for application to a mine project in the permitting or design stage of development.¹ The HVRA will: • Align with provincial strategies such as the BC Climate Preparedness and Adaptation Strategy • Include localized climate data for the mine site • Identify and prioritize hazards with the co-production of knowledge • Identify potential risk reduction strategies The HRVA will inform the Tenas Mine Emergency Response Plan which will integrate climate-related risks with a disaster risk reduction perspective and The Tenas GHG Monitoring, Mitigation, and Climate Change Management Plan where the HRVA in accordance with recommended best practice will be reviewed every 5 years. The Project has a commitment to mitigate GHG emissions occurring from the Project and will develop adaptation measures for the Project that include connecting adaptation to health benefits or “co-benefits” for the Project and community because of mitigation and adaptation efforts.

¹ The current online tool is designed and available for use by Indigenous communities and Local Authority representatives.

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
				Measures taken in many sectors to mitigate climate change (by reducing GHGs or sequestering carbon) or to adapt to climate change can also have very large benefits for health — immediately or in the long term. These “co-benefits” of climate change mitigation and adaptation add to the value of action taken and can avoid poor health outcomes and economic costs to health systems and society [10.6]. Economic savings from such actions can also help to offset the costs to society of reducing GHGs. (https://changingclimate.ca/health-in-a-changing-climate/chapter/10-0/) Berry, P., & Schnitter, R. (Eds.). (2022). Health of Canadians in a Changing Climate: Advancing our Knowledge for Action. Ottawa, ON: Government of Canada. Government of Canada Publications (https://publications.gc.ca/collections/collection_2022/sc-hc/H129-121-2022-eng.pdf)	
2	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	1. Introduction	It says the mine life will be approximately 25 years. Due to the recent change in project ownership, could TML please provide a detailed timeline (including start and end dates) for both the construction and operational phases of the project? We are particularly interested in understanding whether the project schedule may align with other foreseeable developments that could potentially compete for workforce, accommodations, and community infrastructure and services. For example, the North Coast Transmission Line Phase 2—which passes through Telkwa—is currently anticipated to be operational by mid-2031.	The current Project timeline is: - Enter Effects Assessment in Q4, 2025 - Certificate Decision Q2, 2026 - Permit Applications Lodged End of 2026 - Permits Granted Q4 2027 - Construction starts in 2028 - First Coal in late 2028 While there are other Projects planned, these are committed to using dedicated work camps and should not affect the availability of hotels. Telkwa Mining is in contact with BC Hydro to mitigate potential overlaps if possible. This assessment was part of the EAC Application.
3	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	3.1.1.1 Potential Effects	The first sentence in the opening paragraph presents a series of predicted job figures. Could you please revisit the figures? It appears the calculation for construction phase was based on the "Employment (jobs)" column in Table 5.2-1. However, since the paragraph refers to full-time equivalents (FTEs), we should instead use the "Employment (FTEs)" column for accuracy. Using the FTE data, the revised figures would be: Direct: 160.0 + 135.8 = 295.8 FTEs Indirect: 25.1 + 129.1 + 75.9 = 230.1 FTEs Induced: 18.2 + 56.5 + 55.1 = 129.8 FTEs Additionally, the figures for the operations phase appear to have been derived from Table 5.2-2 (Jobs). To maintain consistency, the calculations should instead reference Table 5.2-3 (FTEs).	Telkwa Mining agrees with these changes, the error has been acknowledged and addressed in the revised Environmental Assessment Transition Order Supplemental Report (Version 3.0; Appendix 2).
4	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	3.3.1.1 Potential Effects	Thank you for highlighting the uncertainty in budget allocation. Northern Health facilities located near the project may not necessarily benefit from increased revenue and could, in fact, be negatively impacted—particularly if the workforce’s non-occupational, non-urgent health care needs are not well-managed. These needs typically represent approximately 80–90% of total health care demand, with the remaining 10–20% being occupational and urgent, based on monitoring data from other EA projects. Therefore, I respectfully disagree with the conclusion that a positive effect is predicted. Community infrastructure and services encompass a broad and diverse range of components. It would be overly simplistic to characterize the overall impact as uniformly positive. At a minimum, the conclusion should acknowledge the potentially disproportionate distribution of effects across different sectors and regions.	Please refer to the BC EAO EAC Application, Section 6.0 Social Effects Assessment, Chapter 3 (Infrastructure and Services Valued Component)² for the assessment of adverse effects on community infrastructure. In accordance with the requirements of the Transition Order (BC EAO 2022)³, the revised Environmental Assessment Transition Order Supplemental Report (Version 3.0; Appendix 2, Section 3.1.1.1) identifies new positive effects.
5	4-Sep-25	Items 1, 2, 5 - Positive	3.3.1.2 Mitigation Measures	Northern Health has consistently raised concerns that the existing conditions described for health services do not adequately reflect the capacity challenges in the region, and that the residual effects on health services	Telkwa Mining is committed to implementing the HMSP developed by TCL. The HMSP is a living document that is reviewed every two years and will

² TCL. 2022a. BC EAO Application for the Tenas Project – Section 6.0 Social Effects Assessment Chapter 3 Infrastructure and Service Valued Component. May 2022. Retrieved at: https://projects.eao.gov.bc.ca/api/public/document/627c1f340df8410022b077f3/download/06.3_InfraServ_May2022-.pdf

³ BC EAO. 2022. Transition Order under Section 78(7). December 2022. Retrieved at: https://projects.eao.gov.bc.ca/api/public/document/639ce258f66bcd00222e8f1e/download/Tenas_Transition_Order_Dec%2016%2C%202022_FINAL.pdf

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
		Effects to Indigenous, Indirect Effects, Land Use Plans		have not been accurately assessed or described. In response to these concerns, the previous project proponent, Telkwa Coal Ltd. (TCL), made a series of commitments regarding the Health and Medical Services Plan (HMSP) to mitigate residual effects (see NH-22 in the Master Issues Tracking Table). TCL also expedited the drafting of an HMSP for Northern Health’s review. Given the change in ownership, it is critical that the new proponent, TML, is made aware of the HMSP-related commitments and the draft HMSP prepared by TCL. Lastly, it is important to note that health system capacity is not static—it has been fluctuating and, in some areas, deteriorating. The assessment conducted in 2022 does not necessarily reflect the current situation, nor does it account for the anticipated conditions when the project enters the construction phase.	be reviewed during the permitting process and upon the decision to construct the Project to ensure it reflects the current situation of the health system in the region. This will include engagement with NH to ensure their feedback is incorporated.
6	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	3.3.2.2 Additional Mitigation Measures	Could you please clearly identify the present and foreseeable projects? It is not reasonable to assume that these projects would have similar enhancement measures in place without understanding their presence, scope of capital investment, workforce size, and specific mitigation strategies. For example, we are currently aware of two foreseeable projects: 1. The North Coast Transmission Line, which passes through Telkwa and may include a camp near the community. 2. The Prince Rupert Gas Transmission project near Houston, for which camp locations have not yet been shared with us. Both projects are expected to have some level of impact on community infrastructure and services, including health and medical services. Therefore, further research is needed to better understand these projects and to provide a more accurate estimate of their cumulative effects.	The list of past, present, and reasonably foreseeable future projects are found on Page 34 of the Application Information requirements (BC EAO 2022 ⁴) and Section 5.0, Chapter 1, Table 6-1 in the EAC Application (TCL 2022b ⁵). Telkwa Mining will revisit mitigation measures during the permitting process, once there is a clearer understanding of the intended camp setups and construction timelines for these two Projects, which were not foreseeable in 2020.
7	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	Table 2: Response to 15 May 2025 to Office of the Wet’suwet’en Comments on Section 25 Transition Orders	Regarding TML’s response to OW-181: While Northern Health has consistently advocated for closed camps for EA projects to the greatest extent possible, we understand that both TCL and TML may prefer to house workers within communities. Given your commitment to providing transportation from various towns, it is important to highlight the risks associated with shuttle bus services, particularly in relation to accidents and malfunctions. Emergency preparedness and response planning must explicitly account for potential shuttle bus incidents. To illustrate the importance of this issue and clarify Northern Health’s expectations for project proponents, we refer you to a letter from Northern Health addressed to Coastal GasLink regarding the June 2023 bus incident. This letter is included in Appendix E of SEEMP Status Report No. 11, available at: https://www.coastalgaslink.com/siteassets/pdfs/about/regulatory/cgl-seemp-status-report-no-11.pdf	Telkwa Mining will add this aspect to accidents and malfunctions during the permitting process. The MERP will also be updated to include improvements from NH that were provided in their letter on the bus incident.
8	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	3.4.3 Mental Health	The discussion focused on women employed by the project. However, what about women who are not directly employed, but whose partners work shift jobs at the project?	Section 3.4.3 Mental Health of the Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Appendix 1) has been updated to include a discussion around the potential mental health effects of the Project on women whose partners work shift jobs at the Project with the following text: <i>“The mental health effects of working conditions in resource projects may extend beyond workers to affect their partners and children, particularly women (Manning et al., 2018; J. Shandro, 2014). Women whose partners are employed in resource projects are more vulnerable to emotional distress associated with prolonged partner absences from long shift rotations. The responsibility of managing childcare and housework during these periods can contribute to increased stress levels and social isolation.”</i> Telkwa Mining is committed to implementing an Employee and Family Assistance Program to address mental health effects on workers' partners, including women, and their children (see Table 8 in the report).

⁴ BC EAO. 2022. Application Information Requirements – Tenas Project. January 2022. Retrieved from: https://projects.eao.gov.bc.ca/api/public/document/61eb407fd72e0e0022f2693f/download/Tenas%20Application%20Information%20Requirements_FINAL.pdf

⁵ TCL. 2022b. BC EAO Application for the Tenas Project – Section 5.0 Social Effects Assessment Chapter 1 Labour Market Valued Component. May 2022. Retrieved at: https://projects.eao.gov.bc.ca/api/public/document/627c1e960df8410022b077b0/download/05.1_LabMark_May2022-.pdf

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
9	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	The revised intersectional mitigation under the theme of "employment and income, mental health" mentions the development of support groups. Could you clarify what these groups are? Are you referring to the ones listed in Table 1?	Telkwa Mining will develop support groups at the mine for the equity-deserving populations such as Indigenous persons, women, and 2SLGBTQI+ to provide a safe space to discuss concerns and provide input to Telkwa Mining, particularly regarding strategies to reduce barriers or other issues related to employment and training. Telkwa Mining will involve community service providers such as those identified in Table 1 of the Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Appendix 1) when developing these support groups. The support groups will likely meet on a quarterly basis in Telkwa or alternative convenient location.
10	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	The key mitigation measures under the theme of "housing, mental health" mention a phased ramp-up of the workforce. Northern Health would like to share our experience from other EA projects, where we observed significant deviations between the forecasted and actual non-local/regional workforce sizes, as well as the timing of employee ramp-up and peak periods. In several cases, project proponents housed workers outside of designated camps (e.g., in hotels, motels, or trailers) or amended their Environmental Assessment Certificate (EAC) to increase camp capacity. Although the Tenas Project does not include a worker camp, it could face similar challenges in securing appropriate housing for workers if actual conditions differ from forecasts. It is therefore critical for TML to closely monitor workforce trends and respond proactively to avoid adverse outcomes.	Telkwa Mining agrees with this comment. The Project's Socio-Economic Management Program (SEMP) includes a monitoring program that will proactively track trends in workforce demographics and location. This information will enable Telkwa Mining to implement additional follow-up mitigations and address potential challenges in securing housing for workers (Table 6.2-14 in the SEMP).
11	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Regarding key mitigation measures of "construction workforce accommodation": Please be mindful of other projects currently underway or planned in the area and avoid creating impacts on the normal housing needs of local/regional residents and tourists, while still supporting opportunities to increase revenue for local businesses.	Telkwa Mining agrees with this comment and is contact with the two projects currently in the planning stage with the goal of determining appropriate mitigations and coordination of engagement with local communities to reduce impacts from the cumulative effect of the projects.
12	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	The revised intersectional mitigation under the theme of "food security" mentions a breakfast program at schools. Thank you for offering support and funding. If TML or the school requires assistance with the details of implementing a breakfast program, Northern Health has resources available, including dedicated webpages and population health dietitians who can support planning and delivery. More information is available at: https://www.northernhealth.ca/health-information/healthy-eating-school	Telkwa Mining appreciates the information and looks forward to collaborating with Northern Health in the delivery of these important programs.
13	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Some EA mining projects in the North—such as Blackwater Gold—have implemented similar initiatives, and it may be beneficial for TML to connect with them to learn more about program delivery and outcomes before allocating resources. While the intent of this initiative is commendable, it is important to ensure that regular review of outcomes are built into the process to inform updates or revision to the program as needed.	Telkwa Mining agrees with this statement and will connect with Blackwater Gold on this topic. Telkwa Mining will add a component to the SEMP related to the provision of support and funding for breakfast programs at Telkwa Elementary and/or Witset School during the Operation phase. The SEMP will include a monitoring program to track and review outcomes and mechanisms to adapt the program to changing conditions as needed. The program is contingent on securing government and/or non-government partners to assist with 50% of program delivery.
14	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Regarding key mitigation measures under the theme of "employment and income, childcare": Northern Health would like to remind TML that the commitment to fund two full-time positions at approved childcare facilities was made at least three years ago. It is critical to ensure that, when construction or operations begin, this need still exists within the community. Once this prescriptive commitment is recorded as an Environmental Assessment Certificate (EAC) condition, it may become cumbersome to alter—particularly if the need for daycare staff no longer exists or proves difficult to fulfill. Northern Health does not object to this well-intended commitment but would like to kindly remind TML of the importance of maintaining flexibility.	Telkwa Mining appreciates the input from Northern Health and agrees that EAC conditions should maintain flexibility.

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
15	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Please describe the Tenas Mine Advisory Committee, including the criteria for becoming a member, its purpose, scope, and meeting frequency.	Telkwa Mining will engage with the local community(ies) and Indigenous Nations during the permitting phase to confirm the makeup and terms of reference of the committee. Currently, Telkwa Mining envisions the Tenas Mine Advisory Committee (TMAC) to comprise approximately 13 members including Indigenous Nations (i.e., Office of the Wet'suwet'en, Wet'suwet'en First Nation, Witset First Nation, Kwen Bea Yex House, Cas'Yex House), town councils and local citizen groups (i.e., Smithers Town Council, Telkwa Town Council, What Matters in Our Valley, Houston Town Council), Regional District of Bulkley Nechako, Bulkley Valley Community Resources Board, and Telkwa Mining (Telkwa Mining Senior Leadership Team Member). Telkwa Mining is happy to include Northern Health in the TMAC upon request. To join the TMAC one must be an active member of one of the groups identified above. Members will serve for a term of three to five years and can serve multiple terms. The purpose of the TMAC is to provide independent, high-level oversight of mine related activities and an alternative channel for the public to express concerns and/or comment on mine activities and effects. The scope of the TMAC includes: • providing information on key aspects of the operation that overlaps with community (i.e., Indigenous, safety, socio-economic, and community, human resources, environmental, tourism, and other business • review of complaints and other feedback identified or designated as high priority; • review of safety and/or environmental incidents or issues identified or designated as high priority; • participation in tour(s) of the operation; • providing a forum or mechanism for Indigenous groups and the public to provide feedback; • guidance and advice on appropriate response(s) to received input from Indigenous groups and the public; • notifications to Indigenous groups and the public on any substantive changes in project activities during construction and/or operation; and • providing feedback and advice to the Collaborative Governance Steering Committee. The TMAC will meet at minimum twice per year.
16	8-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 9: Intersectional monitoring, management, and evaluation measures - SEMP	This table outlines numerous monitored indicators included in the SEMP. NH would like to remind TML that the draft HMSP, developed by the previous project proponent (TCL), also contained a substantial number of monitored indicators. To ensure we're aligned on what has already been agreed upon, I will share the most recent draft HMSP currently available.	Telkwa Mining is committed to implementing the HMSP as developed by TCL and looks forward to working with NH to confirm alignment on the previously agreed to monitoring indicators.

Enclosure 4

FOSSIL MANAGEMENT BRANCH COMMENTS AND RESPONSES BASED ON TELKWA MINING'S RESPONSE TO TRANSITION ORDER SCHEDULE A SECTION C ITEMS 1, 2, 3, 4, AND 5

Table 1: Responses to 5 September 2025 FMO’s Comments on Section 25 Transition Order

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to NH Comments
1	5-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, indirect effects, land use plans	Environmental Assessment Supplemental Response, Executive Summary, ii-iii	Add "Fossil Resources" to the list of valued components, or specify "Heritage Resources (Including Fossils)"	Telkwa Mining acknowledges FMO’s feedback. The Supplemental Report has retained the valued components as established by the Environmental Assessment Office (EAO) in the Application Information Requirements (BC EAO 2022¹). As per previous commitments, Telkwa Mining remains committed to addressing fossil resources through a Fossil Impact Assessment (FIA) during the permitting phase.
2	5-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, indirect effects, land use plans	Environmental Assessment Supplemental Response, Table 2.2-2, Page 2-11	The Heritage Resources section of this table states "in consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Heritage Resources VC." In 2021 the BCFMO required the proponent conduct a Fossil Impact Assessment prior to construction beginning. On Sept 8 2025 the Fossil Management Office heard from the proponent that they had not yet conducted the FIA. We received a letter from the proponent committing to conducting FIA. Suggest including the following in this section: ""mitigation measures to avoid or reduce potential adverse effects on fossil resources include conducting a Fossil Impact Assessment (FIA), to be conducted by proponent's consultant prior to construction beginning"	Telkwa Mining will complete a FIA as part of the permitting phase of the Project.

Notes:

BC = British Columbia; BCFMO = BC Fossil Management Office; FIA = Fossil Impact Assessment; Project = Tenas Metallurgical Coal Project; Telkwa Mining = Telkwa Mining Limited; VC = Valued Component

¹ BC EAO. 2022. Application Information Requirements – Tenas Project. January 2022. Retrieved from: https://projects.eao.gov.bc.ca/api/public/document/61eb407fd72e0e0022f2693f/download/Tenas%20Application%20Information%20Requirements_FINAL.pdf

Enclosure 4

FOSSIL MANAGEMENT BRANCH COMMENTS AND RESPONSES BASED ON TELKWA MINING'S RESPONSE TO TRANSITION ORDER SCHEDULE A SECTION C ITEMS 1, 2, 3, 4, 5, AND 6

Table 1: Responses to 5 September 2025 FMO’s Comments on Section 25 Transition Order

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to NH Comments
1	5-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, indirect effects, land use plans	Environmental Assessment Supplemental Response, Executive Summary, ii-iii	Add "Fossil Resources" to the list of valued components, or specify "Heritage Resources (Including Fossils)"	Telkwa Mining acknowledges FMO’s feedback. The Supplemental Report has retained the valued components as established by the Environmental Assessment Office (EAO) in the Application Information Requirements (BC EAO 2022¹). As per previous commitments, Telkwa Mining remains committed to addressing fossil resources through a Fossil Impact Assessment (FIA) during the permitting phase.
2	5-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, indirect effects, land use plans	Environmental Assessment Supplemental Response, Table 2.2-2, Page 2-11	The Heritage Resources section of this table states "in consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Heritage Resources VC." In 2021 the BCFMO required the proponent conduct a Fossil Impact Assessment prior to construction beginning. On Sept 8 2025 the Fossil Management Office heard from the proponent that they had not yet conducted the FIA. We received a letter from the proponent committing to conducting FIA. Suggest including the following in this section: ""mitigation measures to avoid or reduce potential adverse effects on fossil resources include conducting a Fossil Impact Assessment (FIA), to be conducted by proponent's consultant prior to construction beginning"	Telkwa Mining will complete a FIA as part of the permitting phase of the Project.

Notes:

BC = British Columbia; BCFMO = BC Fossil Management Office; FIA = Fossil Impact Assessment; Project = Tenas Metallurgical Coal Project; Telkwa Mining = Telkwa Mining Limited; VC = Valued Component

¹ BC EAO. 2022. Application Information Requirements – Tenas Project. January 2022. Retrieved from: https://projects.eao.gov.bc.ca/api/public/document/61eb407fd72e0e0022f2693f/download/Tenas%20Application%20Information%20Requirements_FINAL.pdf

November 24, 2025

Stasia Ferbey, B.Sc.
Project Assessment Director
BC Environmental Assessment Office

SUBJECT: Telkwa Mining's Response to the Environmental Assessment Office's (EAO) Items 3, and 4 of Section C in Schedule A of the Transition Order Issued on 16 December 2022 for the Tenas Project

Dear Stasia,

Telkwa Mining Limited (Telkwa Mining; previously Telkwa Coal Limited) is submitting the attached **final** response reports (**Enclosures 1 and 2**) in fulfillment of Items 3, and 4 of Section C of Schedule A of the Environmental Assessment Office's (EAO) Transition Order, issued on 16 December 2022. The Transition Order, Items 3, and 4 of Section C of Schedule A, require the following:

3. *Disproportionate effects on distinct human populations, including populations identified by gender, including:*
 - a. *The Proponent's efforts to engage human populations in culturally appropriate ways, including groups identified by gender, age, race, or other factors considered relevant by the community.*
 - b. *A description of how the Proponent's engagement was designed to support the collection of information needed to complete the Gender Based Analysis Plus (GBA+) as described in the EAO's Human and Community Well-being: Guidelines for Assessing Social, Economic, Cultural and Health Effects in Environmental Assessments in B.C.*
 - c. *The Project's impacts on distinct populations, including Indigenous Peoples or groups identified by gender, age, or other factors considered relevant based on the results of the GBA+.*
 - d. *A description of how input from Indigenous nations, the public, and local governments was incorporated into the analysis and conclusions set out in the Application about both positive and negative effects and how the proponent's plans for the Project have changed as a result.*
 - e. *The measures to be taken to address uncertainty in conclusions about effects of the Project on distinct human populations.*
 - f. *The economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.*

4. *The Project's effects on current and future generations, including:*
 - g. *The Project's positive or negative effects on environmental, economic, social, cultural and health Valued Components (VCs) and Indigenous interests, as those effects impact both current and future generations.*
 - h. *A description of how input from the public and Indigenous Nations related to effects on current and future generations was incorporated into the Application and how the Proponent's plans for the Project has changed as a result.*
 - i. *Measures that would more equitably distribute positive and negative effects of the Project over time (e.g., across generations).*
 - j. *A description of how residual effects to VCs and Indigenous interests will affect both current and future generations.*
 - k. *The type(s) of economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.*

Telkwa Mining contracted Hatfield Consultants (Hatfield) to prepare the Supplemental Response Reports (the reports) in response to the above Transition Order requirements. The draft reports were provided to the the Office of the Wet'suwet'en (OW) in November 2024 for feedback. The reports were also submitted to the EAO in March 2025 requesting feedback. Since these submissions, Telkwa Mining has received additional information from the OW and the attached reports (**Enclosures 1 and 2**) have been updated to incorporate this information.

In particular, the attached reports have been updated to indicate where supplemental information will be provided by the OW in its Rights Impact Assessment, Cultural Use, and Cultural Wellbeing studies, which are expected to be finalized in 2025. Telkwa Mining understands that this supplemental information from the OW will inform the EAO's Effects Assessment. Telkwa Mining is committed to continuing to work with the OW to incorporate information it provides into ongoing Tenas Project development.

Based on the review by Hatfield, the conclusions drawn in the Environmental Assessment Certificate Application are still valid, and the Tenas Project is not expected to cause significant residual adverse effects to the Valued Components identified above.

OFFICE OF THE WET'SUWET'EN COMMENTS

The OW has provided Telkwa Mining with the following submissions that included comments on the draft reports submitted in November 2024/March 2025:

- 28 February 2025 letter with the subject "*Office of the Wet'suwet'en Response to Telkwa Mining Limited's November 28, 2024, Letter re: IR Status*";
- 12 March 2025 letter with the subject "*Information Requests Regarding Impacts to Caribou and Aquatic Resources for the Tenas Coal Project*"; and

- 15 May 2025 email with the subject “Section 25 IR Response – OW Review”.

Telkwa Mining has prepared a memo for the OW, which provides responses to the comments provided in these three letters in **Enclosure 3**. This is a tracking table with the OW’s comments and Telkwa Mining’s responses.

OTHER REVIEWER COMMENTS

Nothorn Health and the Fossil Management Branch who are reviewers from the Tenas Project Technical Working Group also provided comments on this report. Their comments and TML responses are provided in Enclosures 4 and 5. Hatfield updated their reports to reflect these comments. Enclosures 1 and 2 enclosed are the final updated reports related to the fulfillment of Items 3, and 4 of Section C in Schedule A of the Transition Order issued on 16 December 2022.

CLOSING

Telkwa Mining is submitting the enclosed information in fulfillment of Items 3 and 4 of Section C of Schedule A of the Transition Order. The intent is for this information to support the EAO advancement of the Tenas Project into the Effects Assessment Phase, and the development of the EAO’s Effects Assessment Report, draft Certificate, and recommendations.

Telkwa Mining understands that the OW is completing their Assessment Process. Telkwa Mining is committed to continuing to work with the OW throughout Tenas Project development to appropriately integrate the OW’s information and welcomes their ongoing participation in the Tenas Project. Where additional responses are appropriate based on engagement with OW and EAO, Telkwa Mining will provide supplemental information to both the EAO and the OW.

Sincerely,



Daniel J. Farmer, P.Eng.
Project and Development Manager
Telkwa Mining Limited
Email: dan.farmer@telkwa-mining.ca
Phone: +778-643-2843
Cell: +604-220-5703

Cc. Jessy Chaplin, File

ENVIRONMENTAL ASSESSMENT OFFICE AND OFFICE OF THE WET'SUET'EN INFORMATION REQUESTS

- Enclosure 1: Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report, Hatfield
- Enclosure 2: Revised Tenas Project Environmental Assessment Transition Order: Current and Future Generations Analysis Report, Hatfield
- Enclosure 3: Tenas Project Environmental Assessment—Telkwa Mining's Responses to the Office of the Wet'suwet'en's Comments provided in
- 28 February 2025 letter with the subject "Office of the Wet'suwet'en Response to Telkwa Mining Limited's November 28, 2024, Letter re: IR Status";
 - 12 March 2025 letter with the subject "Information Requests Regarding Impacts to Caribou and Aquatic Resources for the Tenas Coal Project"; and
 - 15 May 2025 email with the subject "Section 25 IR Response – OW Review"
- Enclosure 4: Northern Health Comments and Responses based on Telkwa Mining's Response to Transition Order Schedule A Section C Items 1, 2, 3, 4, 5, and 6
- Enclosure 5: Fossil Management Branch Comments and Responses based on Telkwa Mining's Response to Transition Order Schedule A Section C Items 1, 2, 3, 4, and 5

Enclosure 1

REVISED TENAS PROJECT ENVIRONMENTAL ASSESSMENT TRANSITION ORDER: GENDER-BASED ANALYSIS PLUS REPORT, HATFIELD



TENAS PROJECT ENVIRONMENTAL ASSESSMENT TRANSITION ORDER: GENDER-BASED ANALYSIS PLUS REPORT

Prepared for:

TELKWA MINING LIMITED
1415 HANKIN AVENUE
SUITE D
TELKWA, BC
CANADA, V0J 2X0

Prepared by:

HATFIELD CONSULTANTS LLP
#200 - 850 HARBOURSIDE DRIVE
NORTH VANCOUVER, BC
CANADA V7P 0A3
TEL: 1.604.926.3261 • WWW.HATFIELDGROUP.COM

 *Canadian and owner-operated*

UPDATED SEPTEMBER 2025

TCC12025
VERSION 9.0

TABLE OF CONTENTS

LIST OF TABLES	iii
LIST OF FIGURES.....	iii
LIST OF APPENDICES	iii
LIST OF ACRONYMS.....	iv
KEY TERMS.....	v
DISTRIBUTION LIST	vii
AMENDMENT RECORD	vii
1.0 INTRODUCTION	1
1.1 ORGANIZATION	2
1.2 REGULATORY CONTEXT	3
1.3 SCOPE	4
1.3.1 Study Area	5
1.4 METHODOLOGY	5
2.0 EXISTING CONDITIONS	8
2.1 INDIGENOUS HISTORICAL CONTEXT.....	8
2.2 MINING SECTOR CONTEXT	9
2.3 POPULATION AND DEMOGRAPHICS	10
2.4 EMPLOYMENT AND INCOME.....	12
2.4.1 Employment and Income in the LSA.....	12
2.4.2 Income	14
2.4.3 Education	16
2.5 COMMUNITY INFRASTRUCTURE AND SERVICES.....	18
2.5.1 Child Care	18
2.5.2 Housing	19
2.6 CRIME AND PUBLIC SAFETY	21
2.7 COMMUNITY HEALTH AND WELL-BEING	24
2.7.1 Cost of Living.....	24
2.7.2 Food Security	24
2.7.3 Mental Health	25
3.0 ANALYSIS OF PROJECT EFFECTS	27
3.1 EMPLOYMENT AND INCOME.....	28
3.2 COMMUNITY INFRASTRUCTURE AND SERVICES.....	31
3.2.1 Child Care	31
3.2.2 Housing	31
3.3 CRIME AND PUBLIC SAFETY	33
3.4 COMMUNITY HEALTH AND WELL-BEING	35

3.4.1	Cost of Living.....	35
3.4.2	Food Security	36
3.4.3	Mental Health	37
4.0	MITIGATION MEASURES	40
4.1	DIVERSE POPULATION-SENSITIVE MITIGATION MEASURES	41
4.2	MONITORING, MANAGEMENT, AND EVALUATION	62
5.0	SUMMARY OF PROJECT EFFECTS ON EQUITY-DESERVING GROUPS – AFTER MITIGATION	73
5.1	KEY PROJECT BENEFITS SUMMARY	77
6.0	CONCLUSION	79
7.0	REFERENCES.....	80

LIST OF TABLES

Table 1	Organizations interviewed.....	6
Table 2	BC’s mineral and metal sectors employment.	10
Table 3	Population summary.	10
Table 4	Average and median after-tax income, 2020.....	14
Table 5	Intimate partner violence – rate per 100,000.....	22
Table 6	Hiring and economic benefits through employment.....	28
Table 7	Bathurst Resources Ltd. intersectional corporate policies.....	40
Table 8	Intersectional mitigation measures.	42
Table 9	Intersectional monitoring, management, and evaluation measures – Socio-Economic Management Plan (SEMP).	62

LIST OF FIGURES

Figure 1	Median age, 2021.	11
Figure 2	Labour force characteristics, Village of Telkwa, Smithers, Houston, Witset, LSA, BC – 2016 and 2021.	12
Figure 3	Prevalence of low income based on the Low-Income Measure, After Tax (LIM-AT).....	15
Figure 4	Highest educational attainment, 2016 and 2021.	17

LIST OF APPENDICES

Appendix A1	Personal Comments
Appendix A2	LSA Organizations Interviewed – Equity-deserving Groups Served
Appendix A3	Interview Questions

LIST OF ACRONYMS

2SLGBTQI+	Two-spirited, Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and anyone beyond those named who identify as diverse in gender or sexual orientation (Women and Gender Equality Canada, 2021).
BC	British Columbia
CUS	Cultural Use Study
EA	Environmental Assessment
EAO	Environmental Assessment Office
EDI	Equity, Diversity, and Inclusion
GBA Plus	Gender-based Analysis Plus
HSABC	Homelessness Services Association of BC
ISSET	Indigenous Skills and Employment Training
LSA	Local Study Area
OW	Office of the Wet'suwet'en
OHSP	Occupational Health and Safety Program
RCP	Reclamation Plan
RDBN	Regional District of Bulkley-Nechako
RIA	Rights Impact Assessment
SEMP	Socio-economic Management Plan
WWS	Wet'suwet'en Wellbeing Study

KEY TERMS

2SLGBTQI+ – An acronym used to describe the members of the greater community that do not adhere to conventionally-established roles of gender-identification and/or sexual orientation: Two-spirited, Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and anyone beyond those named who identify as gender and/or sexual orientation diverse (Women and Gender Equality Canada, 2021).

Core housing need – The state of core housing need refers to households living in homes that are a) unaffordable, i.e., paying more than 30% of their before-tax income on housing, and b) inadequate given the physical condition of the housing unit and/or unsuitable relative to household size (Canada Mortgage and Housing Corporation, 2019).

Equity, Diversity, and Inclusion – A framework that promotes resource provision to enable individuals with diverse needs to participate and engage to the same extent (equity), representation of diverse identity groups in an organization or community (diversity), and respectful inclusion of different approaches, perspectives and experiences (American Psychological Association, n.d.; Canadian Centre for Diversity and Inclusion, 2022).

Equity-deserving groups – Equity-deserving populations are those that have been historically underrepresented, discriminated against, or otherwise disadvantaged and as a result disproportionately experience barriers to opportunities and resources (Equity & Inclusion Office, 2023; Presidential Bi-Campus Standing Committee on Equity, Diversity, Inclusion and Human Rights, 2023).

Gender – Gender identity is an individual's experience and understanding of their own gender. A gender identity may be self-defined in relation to biological sex (cisgender) or separate from biological sex (diverse gender identities) (Native Women's Association of Canada, 2020a).

Indigenous – Refers to First Nations, Métis, Inuk (Inuit), persons registered as Treaty Indian under the *Indian Act* of Canada, and/or members of a First Nation or Indian band and is a preferred term in Canada and globally (Statistics Canada, 2022a).

Intersectional – Intersectionality is a concept that recognizes that people have diverse, intersecting factors that shape their perspectives, ideologies, and experiences (UNPRPD & UN Women, 2021). These factors include identities, relationships, and social factors. The intersection of these factors can create intersecting forms of privilege and oppression depending on a person's context and existing power structures (Crenshaw, 2016; Keltie Craig Consulting et al., 2021)

LIM-AT – Low Income Measure, after tax, is used by Statistics Canada to establish a threshold of low-income identification which allows comparison of individuals across different household sizes (Statistics Canada, 2017c). When the after-tax income of household pertaining to a person falls below the threshold applicable to the person based on household size, the person is low income according to LIM-AT.

Men / Women – This report uses “Men” and “Women” to indicate people's chosen gender identity. Men includes cisgender, trans men, and some non-binary persons. Women includes cisgender women, trans women, and some non-binary persons (Statistics Canada, 2021).

Newcomer – This term identifies anyone residing and working in Canada who was not born in Canada, whether through permanent resident, citizenship, or temporary visa status.

Persons with disabilities – Persons with mental and physical disabilities experience conditions which, without support or accommodation, impact their ability to conduct day-to-day functions and/or ability to work. Persons with disabilities experience conditions related to learning, development, physical health, mental health conditions, sensory impairment, or mobility impairment (BC Human Rights Tribunal 2023) (Canadian Centre for Diversity and Inclusion, 2023). A disability may or may not be visible to outsiders. Structurally speaking, a disability is relative to the environment and/or society in which a person lives and works.

Two-Spirit – A term created by two-spirit community members and leaders in 1994 to reclaim traditional values and roles associated with diverse gender identities and sexual orientations within Indigenous communities; two-spirit challenges and departs from western concepts of gender binaries and sexual orientation (Provincial Health Services Authority 2023; Native Women’s Association of Canada 2020).

Yintah – Traditional territory of the Wet’suwet’en in the Wet’suwet’en language, called Witsuwit’en. Yin means “earth” or “land” and together with tah it means “territory.” Oral history tells that their ancestors have been on this land since time immemorial. It is the integral connection between both people and the land. This concept remains the focal point of Wet’suwet’en values as it inspires the awareness, importance, and interconnectedness of all living, and non-living aspects of the environment. It is a philosophy and ideology that everything is connected to the land.

Visible minority – Visible minority refers to a person belonging to one of the visible minority groups defined by the *Employment Equity Act*, which defines visible minorities as “persons, other than Aboriginal peoples, who are non-Caucasian in race or non-white in colour” (Statistics Canada, 2022b).

DISTRIBUTION LIST

The following individuals/firms have received this document:

Name	Firm	Hardcopies	Email	FTP
Dan Farmer	Telkwa Mining Ltd.	-	dan.farmer@telkwa-mining.ca	-

AMENDMENT RECORD

This report has been issued and amended as follows:

Issue	Description	Date	Approved by	
1	First version Tenas Project Environmental Assessment Transition Order Gender-based Analysis Plus Report	20240312	Robin Sydneysmith Project Director	Sally Western Project Coordinator
2	Second version Tenas Project Environmental Assessment Transition Order Gender-based Analysis Plus Report	20240422	Robin Sydneysmith Project Director	Sally Western Project Coordinator
3	Third version Tenas Project Environmental Assessment Transition Order Gender-based Analysis Plus Report	20241009	Robin Sydneysmith Project Director	Sally Western Project Coordinator
4	Fourth version Tenas Project Environmental Assessment Transition Order Gender-based Analysis Plus Report	20250424	Robin Sydneysmith Project Director	Sally Western Project Coordinator
5	Fifth version Tenas Project Environmental Assessment Transition Order Gender-based Analysis Plus Report	20250505	Lyle Thompson Project Manager	Adinda Herdianti Social Science Specialist
6	Sixth version Tenas Project Environmental Assessment Transition Order Gender-based Analysis Plus Report	20250617	Robin Sydneysmith Project Director	Adinda Herdianti Social Science Specialist
7	Seventh version Tenas Project Environmental Assessment Transition Order Gender-based Analysis Plus Report	20250624	Robin Sydneysmith Project Director	Adinda Herdianti Social Science Specialist
8	Eight version Tenas Project Environmental Assessment Transition Order Gender-based Analysis Plus Report	20250722	Robin Sydneysmith Project Director	Adinda Herdianti Social Science Specialist
9	Ninth version Tenas Project Environmental Assessment Transition Order Gender-based Analysis Plus Report	20250919	 Robin Sydneysmith Project Director	 Adinda Herdianti Social Science Specialist

Gender-based Analysis Plus (GBA Plus) requirements for the Tenas Project Application

Transition Order Requirement	Section
a) The Proponent's efforts to engage human populations in culturally appropriate ways, including groups identified by gender, age, race, or other factors considered relevant by the community.	Section 1.4 Methodology
b) A description of how the Proponent's engagement was designed to support the collection of information needed to complete the GBA Plus as described in the EAO's Human and Community Well-being: Guidelines for Assessing Social, Economic, Cultural and Health Effects in Environmental Assessments in BC.	Section 1.4 Methodology
c) Project's impacts on distinct populations, including Indigenous Peoples or groups identified by gender, age, or other factors considered relevant based on the results of the GBA Plus.	Section 3.0 Analysis of Project Effects Section 5.0 Summary of Project Effects on Equity-deserving groups-After Mitigation
d) A description of how input from Indigenous nations, the public, and local governments was incorporated into the analysis and conclusions set out in the Application about both positive and negative effects and how the proponent's plans for the Project have changed as a result.	Section 1.4 Methodology Section 4.0 Mitigations
e) The measures to be taken to address uncertainty in conclusions about effects of the Project on distinct human populations.	Section 4.2 Monitoring, Management, and Evaluation
f) The economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.	Section 3.1 Employment and Income Section 4.1 Diverse Population-sensitive Mitigation Measures Section 5.1 Key Project Benefits Summary

1.0 INTRODUCTION

All Telkwa Mining Limited (Telkwa Mining)'s Transition Order Information Requests (IR) responses were available to the Office of the Wet'suwet'en (OW) for their review and comment as of November 13, 2024. OW provided comments on the initial version of this report between February 28 and March 12, 2025. Telkwa Mining has responded to all OW comments in the tracking table issued June 2025 entitled *TML BC EAO OW IR for the Tenas Coal Project*.

OW also indicated that they may provide additional information for EAO's consideration that is relevant to this report from forthcoming OW reports including a Wet'suwet'en Wellbeing Study (WWS), a Rights Impact Assessment (RIA), and a Cultural Use Study (CUS). Annotations are provided herein indicating where any new information will be incorporated. The IR in question and relevant sections of the current report are:

- OW-005 (Section 2.5.2, 2.6, 2.7.1, 2.7.3, 3.2.2, 3.3, 3.4.1, 3.4.2, 3.4.3, 4.1 and 5.0)
- OW-006 (Section 3.0, 3.1, 4.2 and 5.1)
- OW-151 (Section 3.2)
- OW-153 (Section 3.3)
- OW-154 (Section 3.3)
- OW-157 (Section 2.7.1 and 3.4.1)
- OW-158 (Section 4.0)
- OW-159 (Section 4.2)

Telkwa Mining looks forward to the opportunity to speak with House members and OW to better understand concerns regarding gendered violence, mental health, housing, cost of living, food security, community infrastructure and services, project effect pathways, diverse population sensitive mitigation measures and monitoring, management, and evaluation.

The purpose of this chapter is to summarize the analysis and conclusions for the economic, social, and cultural indicators and Indigenous interests that contribute to the Tenas Project's (Project) potential disproportionate effects on distinct human populations, including populations identified by gender, age, ethnicity, or other factors that are considered relevant by the community.

Spatial boundaries for the assessment of potential disproportionate effects on Distinct Human Populations include the Local Study Area (LSA) defined to include the Village of Telkwa, Town of Smithers, District of Houston, and the community of Witset (formerly Moricetown).

To assist with this analysis, a Gender Based Analysis Plus (GBA Plus) was completed based on information gathered by Statistics Canada in 2021 and engagement conducted by Telkwa Mining to identify distinct human populations that are present within the LSA defined above. These distinct human populations are identified as:

- Indigenous People;
- Women;
- Visible Minorities;
- Seniors; and
- Other sensitive populations, including:
 - People with limited education credentials;
 - People living in unaffordable housing;
 - People who identify as 2SLGBTQI+;
 - People with mental and/or physical disabilities;
 - People with moderate to severe mental health challenges;
 - People with low income; and
 - Newcomers to Canada.

The analysis that follows discusses potential negative direct and indirect disproportionate effects on certain distinct human populations (see Table 8 for summary of key adverse effects and associated mitigations). It also discusses a range of potential positive effects that could be beneficial for distinct populations (see Section 5.1).

1.1 ORGANIZATION

The assessment proceeds as follows:

- **Regulatory Context:** An overview of the legislative and jurisdictional extent and requirements of the GBA Plus;
- **Scope of the Assessment:** A description of the assessment scope including methodology, rationale for the selection of themes, and definition of the assessment boundaries;
- **Existing Conditions:** Disproportionate impacts to distinct populations are based on the information compiled in the **Socio-economic Baseline Report – 2021 Census Data**, and other publicly available studies and sources. Descriptions of existing conditions include comments made in interviews conducted during the October 2023 GBA Plus data collection, and available community well-being data on affected Indigenous communities in the LSA. Further information was taken as available from the original **Socio-economic Baseline Report (Appendix 5.1-A of Section (S) 5.0-C1 Labour Market VC)**. The **Cultural Use Study (CUS)** presented in **Appendix 7.1-A of S7.0-C1 Heritage Resources VC**, the **Land and Resource Use Baseline Report** presented in **Appendix 6.4-A of S6.0-4-C Land and Resource Use VC**;

- **Analysis of Project-related Effects:** Potential disproportionate distribution of interactions between the Project and distinct populations are identified and evaluated to determine whether those interactions could result in potential adverse effects on distinct populations within the LSA. Upon identification of these potential effects, mitigation measures are outlined, and any subsequent effects are described; and
- **Follow-up Strategy:** Where adverse changes are identified and mitigated, a process of monitoring and follow-up strategies are provided.

1.2 REGULATORY CONTEXT

This GBA Plus report has considered applicable federal and provincial legislation, regulations, strategies, guidelines, plans, and best practices.

Regulatory Changes in Canada and British Columbia

In 2019 the federal government passed the 2019 *Federal Impact Assessment Act*, which updated the Federal Environmental Impact Assessment process to mandate the application of Gender-based Analysis Plus and more participatory project review and monitoring (Amnesty International, 2016; Gibson et al., 2017; National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019) (Levac et al., 2021). Section 22(1)(s) of the *Act* states: “the impact assessment of a designated project, whether it is conducted by the Agency or a review panel, must take into account...the intersection of sex and gender with other identity factors” (*Impact Assessment Act*, 2019).

British Columbia soon followed suit, passing its 2018 *Environmental Assessment Act*. Like the Federal *Act*, section 25(2) states that all assessments must evaluate “disproportionate effects on distinct human populations, including populations identified by gender” (BC EAO, 2020; *Environmental Assessment Act*, 2018). With these acts in place, those more likely to experience the negative socio-economic impacts of a proposed industrial project—women, LGBTQIA2+ people, those with disabilities, elders, newcomers, and others—are more likely to have their interests and concerns recognized.

Tenas Project EA Transition Order

On December 16th, 2022, the BC EAO issued a transition order to Telkwa Mining, requiring that the Tenas Coal EA process upgrade to certain requirements under the 2018 BC *Environmental Assessment Act*. The Order gave the following requirements:

C. Additional information to address Section 25(1) and Section 25(2) of the *Act*:

3. Disproportionate effects on distinct human populations, including populations identified by gender, including:
 - a) The Proponent’s efforts to engage human populations in culturally appropriate ways, including groups identified by gender, age, race, or other factors considered relevant by the community.
 - b) A description of how the Proponent’s engagement was designed to support the collection of information needed to complete the Gender Based Analysis Plus (GBA Plus) as described in the EAO’s Human and Community Well-being: Guidelines for Assessing Social, Economic, Cultural and Health Effects in Environmental Assessments in BC.

- c) The Project's impacts on distinct populations, including Indigenous Peoples or groups, identified by gender, age, or other factors considered relevant based on the results of the GBA Plus.
- d) A description of how input from Indigenous nations, the public, and local governments was incorporated into the analysis and conclusions set out in the Application about both positive and negative effects and how the proponent's plans for the Project have changed as a result.
- e) The measures to be taken to address uncertainty in conclusions about effects of the Project on distinct human populations.
- f) The economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.

1.3 SCOPE

GBA Plus is an analytical approach to assessing the different ways that diverse groups of people may experience policies, programs, and initiatives (Environmental Assessment Office, 2020). The "plus" indicates that the analysis goes beyond sex and gender and includes a range of other identity factors (e.g., Indigeneity, age, education, language, race, ability, class, etc.). Further, GBA Plus considers intersectionality, a concept that recognizes that people embody and live among diverse and intersecting dynamics that shape their perspectives, ideologies, and experiences (Environmental Assessment Office, 2020; UNPRPD & UN Women, 2021). These factors include identities, relationships, and social aspects. The intersection of these elements can create intersecting forms of privilege and oppression depending on a person's context and existing power structures, such as patriarchy, ableism, colonialism, homophobia, and racism (Crenshaw, 2016; Keltie Craig Consulting et al., 2021). These factors are dynamic and shift in different contexts through time and space.

In this report, the groups referred to as "distinct human populations" by the 2018 *Environmental Assessment Act* are called "equity-deserving groups" or "equity-deserving populations." Equity-deserving populations are those that have historically been underrepresented, discriminated against, or otherwise disadvantaged, and as a result, disproportionately experience barriers to opportunities and resources (Equity & Inclusion Office, 2023; Presidential Bi-Campus Standing Committee on Equity, Diversity, Inclusion and Human Rights, 2023).

Background and Context

Much of the data currently available on gendered impacts of resource and infrastructure development in Canada are derived from Northern and rural contexts. The past decades have produced a growing body of evidence that the construction of industrial projects, particularly those related to extractive industries, can have dramatic social effects on nearby communities. The inequitable distribution of negative effects has been noted particularly in smaller communities and natural resource-reliant economies (Aalhus, Oke, et al., 2018; Ostry, 2009; Rolfe et al., 2007). Community members in small towns and First Nation reserves have raised concerns about negative experiences during project construction phases, such as increased problematic substance use, growing gendered violence, and unequal employment opportunities (Amnesty International, 2016; Gibson et al., 2017; Manning et al., 2018; Mills et al., 2018; National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019).

These findings, combined with the growing international and federal precedent for governments to adopt more equity-based federal policies, motivated Canadian regulators, and policymakers to look for ways to conduct Environmental Impact Assessments that would identify the concerns of diverse and equity-deserving community members.

1.3.1 Study Area

The Local Study Area (LSA) comprises the Village of Telkwa, Town of Smithers, the District of Houston, and Witset (formerly Moricetown). These communities were chosen for the LSA, as they are expected to be directly involved and/or influenced to varying degrees by the Project during the Construction, Operation, Decommissioning and Reclamation, and Post-closure phases of the Project. Based on their physical location to the Project, it is anticipated that these communities may encounter socio-economics impacts, as it relates to labour and employment, business and industry, community services and infrastructure, community well-being, and public safety.

Technical boundaries for GBA Plus have been chosen based on baseline data, data analyses, primary data collected from interviews, and other statistics and information available to characterize existing conditions and the Project workforce. Limitations in the census data from 2016 and 2021, which may affect data accuracy for smaller and Indigenous communities, are discussed in the **Appendix 5.1-A Socio-Economic Baseline Report** and **Appendix 1: Tenas Project GBA Plus Baseline Report**.

For more details on the local study areas please see **Appendix 5.1-A Socio-economic Baseline Report** in the Tenas Project Coal EAC submission.

1.4 METHODOLOGY

This report integrates GBA Plus methodologies as recommended by Women and Gender Canada (WAGE), the Impact Assessment Agency of Canada (IAAC), the BC EAO, and key academic and grey literature publications.

Desktop Review

A GBA Plus lens was initially applied during desktop research. Conclusions and context were drawn from the submission as much as possible and updated as necessary with the more recent data from the 2021 Canada Census. To capture different conditions for distinct sub-populations, each quantitative data set collected has been disaggregated to the extent possible by gender, indigeneity, visible minority status, race, socio-economic status, and any other available demographic details. Many of the communities in the LSA are small which makes it difficult to obtain disaggregated data due to various issues and policies concerning confidentiality. Most commonly, disaggregated data is limited to age, gender, and Indigenous identity. For the same reason, intersectional findings are also limited by the lack of disaggregated data.

The desktop review included a systematic literature review, including some sources used for the Tenas Project EAC submission and additional sources published in 2019 and later, which provide an updated description of socio-economic trends and conditions in the LSA.

Field Research

Field research identified additional details of community-specific data allowing more in-depth analysis within the varying conditions for diverse sub-populations. In addition to reviewing and incorporating data from Telkwa Mining's previous Indigenous, stakeholder, and public engagement activities for the original Tenas Project EAC submission, Telkwa Mining gathered data through [in-person](#) interviews with community service providers and representatives from a diverse range of community organizations (Table 1). Interviewees were identified based on their type of social services provided by their organization and the different equity-deserving groups served. The selection processes ensured interviews would engage those who could represent all major equity-deserving groups across the LSA: low-income people, those struggling with mental health, the insecurely housed, Indigenous people, women, visible minorities, newcomers, and people with mental and physical disabilities.

Interview questions were developed after a thorough review of the effects assessment findings from the Tenas Project EAC submission social and economic VC chapters, the Tenas Project EAC submission Transition Order, and central topics identified in key Canadian and International GBA Plus and Environmental Assessment literature.

Table 1 **Organizations interviewed.¹**

Organization	Location	Activities
Gorbhan Professional Alternative Resources	Town of Smithers	Provide accessible and well-managed real estate solutions that support individuals in securing and maintaining quality living environments.
Northern Society for Domestic Peace	Town of Smithers	Offer a continuum of support services to individuals and families in Northwest BC.
Thomas Robinson Consulting	Town of Smithers	Offer support programs for children, youth, adults, families and community agencies working with people who have developmental disabilities across Northwest BC.
Smithers Community Services Association	Town of Smithers	Provide services for people with developmental disabilities, including family housing, parenting programs, community learning services, and youth programs.
Community Futures	Town of Smithers	Offer business workshops for local businesses and access to small business loans.
Northwest Child Development Centre	Town of Smithers	Offer family-centred health and social services to support the growth and development of children, youth and families.
BC Ministry of Children and Family Development	Town of Smithers	Support all children and youth in BC to live in safe, healthy and nurturing families and be strongly connected to their communities and culture.
Smithers Pride Society	Town of Smithers	Promote development, visibility, and pride in the 2SLGBTQ+ communities.

¹ For more details on services and location of each provider please see Appendix A2.

Table 1 (Cont'd.)

Organization	Location	Activities
Telkwa Seniors' Housing Society	Village of Telkwa	Provide affordable rental homes for low to moderate-income seniors in Telkwa.
Telkwa Seniors Centre	Village of Telkwa	Provide a platform for seniors over the age of 50 to stay connected.
Dze L Kant Friendship Centre	District of Houston	Focus on developing skills and strengths to help Indigenous community become self-sufficient and self-reliant.
Houston Community Services Association	District of Houston	Provide social supports, including parent skill building, advocacy, encouragement, mentorship, referrals, victim services, and early child education.
Link to Learning	District of Houston	Offer literacy programs and services for families and children.
Salvation Army – Bulkley Valley Ministries	District of Houston	Offers practical assistance for children and families, provides shelter for homeless people and rehabilitation for people with addiction.
RCMP	District of Houston	Prevent, detect, deny and respond to criminal activities.

Data Analysis

GBA Plus themes were identified through reviews of effects and residual effects identified in the Tenas Project EAC submission, literature discussing disproportionate impacts of resource development in rural BC and Canada, and key pathways of impact to equity-deserving groups noted in the analysis of updated disaggregated and qualitative and quantitative data.

Physical human health was not discussed in this report because biophysical considerations for more sensitive populations are already included in the Tenas Project EAC submission Human Health Risk Assessment. See **S8.0-C-1 Human Health VC** for more information.

2.0 EXISTING CONDITIONS

This section describes the existing conditions in the LSA as relevant to GBA Plus, based on literature review and baseline studies undertaken for the Project. The information in this subsection establishes the context for the GBA Plus evaluation of potential disproportionate impacts to distinct populations. The overview of existing conditions focuses on the following themes:

- Population and Demographics;
- Income and Employment;
- Crime and Public Safety;
- Community Infrastructure and services; and
- Community Health and Well-being.

2.1 INDIGENOUS HISTORICAL CONTEXT

BC Colonial and Indigenous History

This section includes a summary of historical contextual factors relevant for the analysis of disproportionate effects of the Project on Indigenous interests. The historical context considers cumulative effects that may apply to the Indigenous peoples within the Wet'suwet'en Traditional Territory and BC broadly. Historical information specific to the Project area is included when available. A more detailed summary of the Wet'suwet'en history, culture, and land use can be found in **S11.0 Wet'suwet'en Rights and Interests Assessment** and **Appendix 11.0-A Tenas Project: Cultural Use Study**.

Indigenous people have lived on the lands and waters in the area now known as BC since time immemorial and have developed distinct societies, cultures, territories, and laws. Indigenous peoples, including the Wet'suwet'en, have meaningfully practiced their rights through land and water-based traditional practices that inform Indigenous cultures (Assembly of First Nations, n.d.).

Relationships between Indigenous peoples in BC and European settlers varied spatially and temporally, from peaceful co-existence to the development of policies that aimed to eliminate the rights, languages, and cultures of Indigenous peoples (Government of B., 2023). For nearly a century, the Canadian government's early assimilation policies, such as the *Indian Act*, residential school system and the Sixties Scoop, aimed to eliminate Indigenous peoples' distinct legal, social, cultural, religious, and racial entities through forced displacement from their lands and waters, cultures and communities (First Nations and Indigenous Studies, 2009a; Kumar & Tjepkema, 2019; Truth and Reconciliation Commission of Canada, 2015).

Indigenous peoples in Canada, including in BC, were dispossessed of their land. Indigenous languages and cultural and spiritual practices were banned and the intergenerational knowledge transfer of cultural values and identity was interrupted (Truth and Reconciliation Commission of Canada, 2015). Loss of land and environmental dispossession through historical resource and industrial developments have also contributed to the decline of Indigenous well-being and continue to threaten Indigenous peoples' relationships to land and waters (First Nations and Indigenous Studies, 2009b; Richmond & Ross, 2009)

Indigenous peoples have consistently responded to, and in many cases resisted, the country's legislation and policies that aimed to assimilate Indigenous peoples into colonial lifestyles and values (First Nations and Indigenous Studies, 2009a).

As with other Indigenous peoples in BC and across Canada, the Wet'suwet'en people have lived on their traditional territories since time immemorial (Morin, 2011). European settlement in Wet'suwet'en Traditional Territory occurred as early as 1844. From this time to the early 1900s, a combination of missionaries, trappers, the construction of the Grand Trunk Pacific Railroad (GTPR) and the introduction of forestry had lasting impacts on the settlement of the region, which in turn impacted Wet'suwet'en ways of life.²

The continued European settlement of the Wet'suwet'en territories alongside the GTPR caused even more accelerated changes for the Wet'suwet'en people. The GTPR project disrupted burial grounds and restricted Wet'suwet'en access to fishing, hunting, and camping sites throughout their traditional territory (Lower, 1940). In the early 20th century, the Wet'suwet'en were evicted from their lands and moved to small reserves (McCreary, 2018). Like other Indigenous people, the Wet'suwet'en experienced the impacts of living under the *Indian Act*, which further restricted their autonomy and land rights.

The historical and ongoing effects of settler colonialism and environmental degradation continue to systemically marginalize Indigenous people, leading to adverse socio-economic outcomes and the dispossession of land, resources, and culture (Pasternak, King, and Riley 2019). However, Indigenous peoples, including the Wet'suwet'en, are actively engaged in revitalizing their traditional practices and overcoming adverse historical and ongoing effects. Furthermore, Indigenous peoples and nations are diverse and hold an array of lived experiences, and equity-deserving groups within Indigenous populations may also experience historical cumulative effects differently based on personal identity factors such as gender, sexual orientation, age, disability, race or ethnic background, religion or spirituality, location, education, and socio-economic status (Aird et al., 2019).

2.2 MINING SECTOR CONTEXT

Data from the National and Provincial mining sector provides important context for the role of mining in the LSA. In 2018, the Canadian mining sector contributed 5% to Canada's GDP and generated 634,000 direct and indirect jobs, of which 16,500 were acquired by Indigenous people (Natural Resources Canada 2019). In 2017, 38,440 people worked in the BC mining sector, constituting 1.4% of BC's employment (Table 2) (Government of British Columbia, 2019).

² In one particularly devastating example presented on page 15 of **S11.0 Wet'suwet'en Rights and Interests Assessment** in the original Telkwa EA: "Father Morice, for whom Moricetown (Witset) was named, burned all the local Chiefs' regalia, irrevocably damaging their belief system, and used the Wet'suwet'en as labourers to pan for gold (TERA, 2015). Father Morice's cruel historical legacy contributed to the recent name change of Moricetown to Witset." (Telkwa Coal Ltd., 2022f).

Table 2 BC's mineral and metal sectors employment.

Industry	Jobs
Metal Mining	3,420
Coal Mining	4,475
Industrial minerals + construction aggregates	1,345
Exploration	4,125
Total direct exploration and mining employment	13,635
Mineral refining and smelting	4,990
Downstream mineral processing	19,815
Total direct minerals economy employment	24,805
Total sector employment	38,440

(Government of British Columbia, 2019)

Northwest BC is a major contributor to provincial mining direct and indirect revenues and jobs accounting for over one third of BC's exploration projects in 2023 (Association for Mineral Exploration, 2023). Smithers is an especially important centre for suppliers to the mining sector, ranking 11th in the province, despite having a population just over 5,000 (Mining Association of British Columbia, 2022). 100 companies in Smithers supply \$95 million worth of goods and services to mining operations in the region (Mining Association of British Columbia, 2022).

2.3 POPULATION AND DEMOGRAPHICS

This section provides an overview of population, age and gender, Indigenous identity, visible minority populations, and newcomers in the LSA. Data presented in this section is gathered from Canada's 2016 and 2021 Census of Population (Table 3). The assessment of Witset is based on the available Census data for the following Indian Reserves: Babine 17, Bulkley River, Croyatsaqua (Moricetown 2), and Moricetown 1.

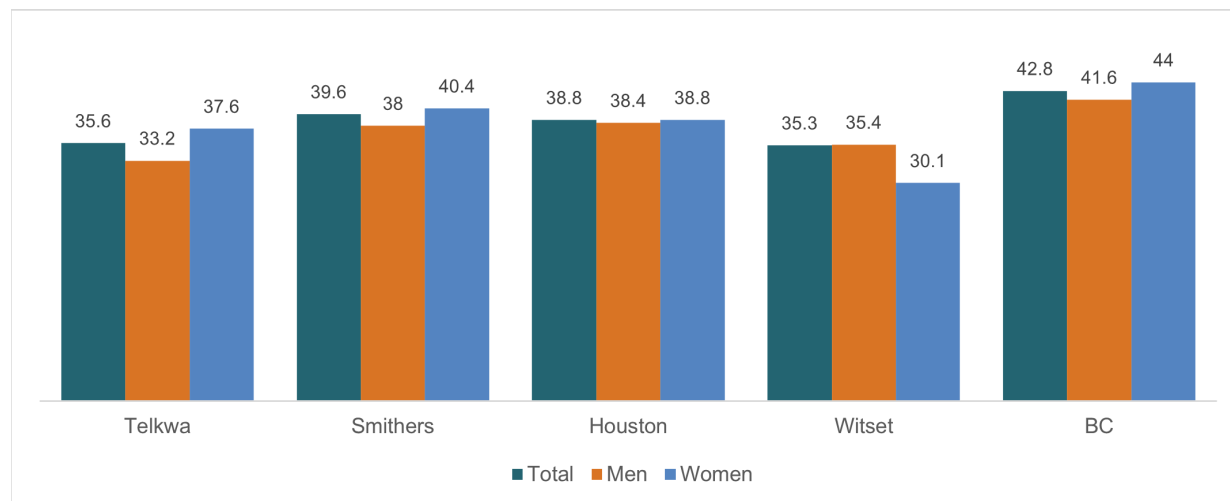
Table 3 Population summary.

	2016			2021			Change		
	Total	Men	Women	Total	Men	Women	Total	Men	Women
Village of Telkwa	1,330	705	625	1,474	790	685	11%	12%	10%
Smithers	5,401	2,625	2,775	5,378	2,600	2,780	-0.4%	-0.9%	0.2%
Houston	2,993	1,550	1,445	3,052	1,575	1,480	2%	2%	2%
Witset	631	335	295	599	340	265	-5%	1%	-10%
LSA	10,352	5,215	5,140	10,503	5,305	5,210	1%	2%	1%
BC	4,648,055	2,278,245	2,369,815	4,915,945	2,416,885	2,499,055	6%	6%	5%

Source: (Statistics Canada, 2017a, 2023b)

Figure 1 shows the median age of four communities within the LSA, all which indicate a relatively young populations compared to the rest of the province. Consistent with the trend across the province, women in the Village of Telkwa, Smithers, and Houston are slightly older than men.

Figure 1 Median age, 2021.



Source: (Statistics Canada, 2023b)

Indigenous Populations

The Indigenous population has remained stable across the LSA from 2016 to 2021 averaging about 17% of the total (Statistics Canada 2017; Statistics Canada 2023). The LSA had equal representation of Indigenous men and women (Statistics Canada, 2017a, 2023b). The proportion of non-Indigenous people in the LSA was 66% higher than the Indigenous population of BC (Statistics Canada 2017; Statistics Canada 2023).

Visible Minorities

The percentage of visible minorities remains far lower in the LSA than in BC, although the numbers are increasing (Statistics Canada 2023b). Smithers has the highest population percentage of visible minorities at 4% (Statistics Canada 2017a; Statistics Canada 2023a).

Newcomers³

The percentage of newcomers to the LSA has grown by 2% since 2016 (Statistics Canada, 2017a, 2023b). Smithers is the most common destination for newcomers, who now make up 16% of the population. The LSA has a much lower percentage of newcomers than BC, which has 34% in total (Statistics Canada 2023b).

³ Newcomers refers to those who are, or who have ever been, landed immigrants or permanent residents (immigrants) and those who have work, study, or temporary resident permits, or who have claimed refugee status (non-permanent residents).

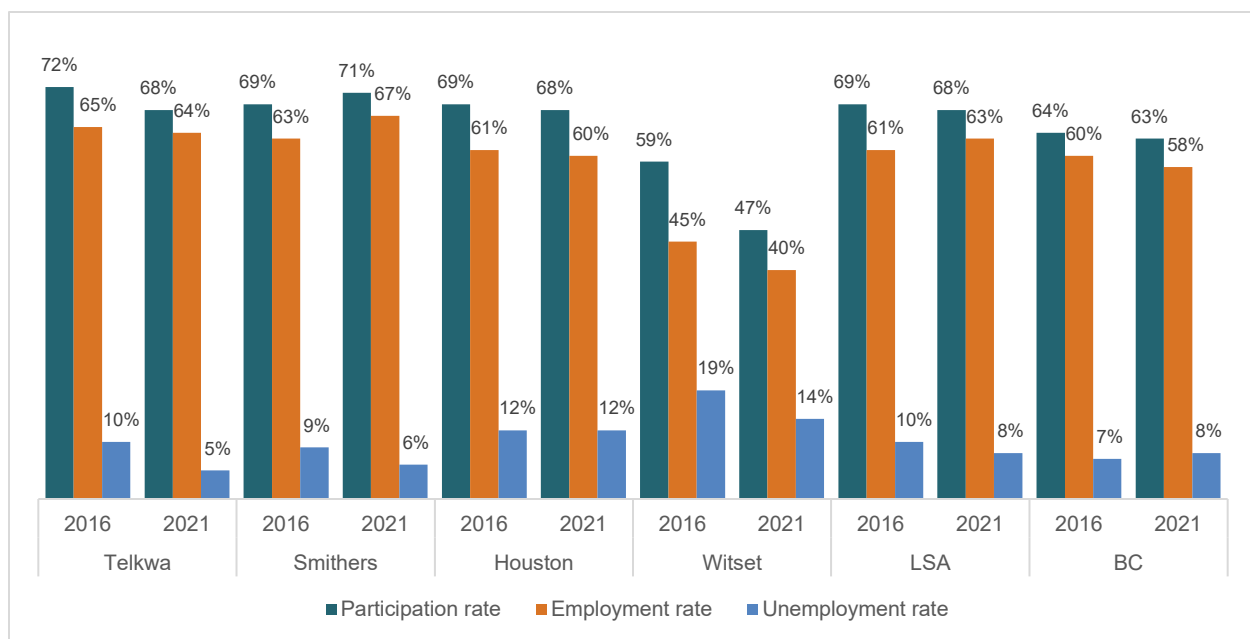
2.4 EMPLOYMENT AND INCOME

2.4.1 Employment and Income in the LSA

In 2021, the LSA working age population⁴ was 8,270, with a participation rate⁵ of 68% and an unemployment rate⁶ of 8%. The highest unemployment rate within the LSA was in Witset at 14% while the Village of Telkwa had the lowest at 5%. Overall, the 2021 unemployment rate in the LSA was lower than 2016 (Figure 2).

Participation rates are higher in the LSA than in BC (Statistics Canada 2017; Statistics Canada 2023). Employment rates in the LSA are also higher in the LSA than in BC.

Figure 2 Labour force characteristics, Village of Telkwa, Smithers, Houston, Witset, LSA, BC – 2016 and 2021.



Source: (Statistics Canada, 2017a, 2023b)

Women

Women in the LSA had lower unemployment rates than men. This differs from BC as a whole where women and men have almost the same unemployment rates (Statistics Canada 2017a; Statistics Canada 2023a). Women in the LSA also had lower employment rates than men.⁷

⁴ Working age population is defined as aged 15 years and over.

⁵ Participation rate represents the share of the working-age population (15 years and over) that is working or looking for work.

⁶ Unemployment rate represents the number of unemployed persons expressed as a percentage of a labour force.

⁷ Unemployment rates and employment rates do not add to 100%. This is because employment rates show the percentage of people who are working out of all people aged 15 and older, while unemployment rates show the percentage of those not working compared to all people in the labour force.

Unemployment rates for women in the LSA in 2021 increased slightly from 2016, consistent with the provincial trend (Statistics Canada 2017a; Statistics Canada 2023a).

Despite registering a lower overall unemployment rate in 2021, women's unemployment in Houston increased by 5% from 2016 to 2021. In Witset unemployment rates decreased, particularly for women during the same census period (Statistics Canada 2017a; Statistics Canada 2023a).

Indigenous Populations

Indigenous participation rates in the LSA are lower than non-Indigenous participation rates by 3%, a 2% greater disparity than in BC (Statistics Canada, 2018b, 2023h). Indigenous women have a 4% lower rate of participation than Indigenous men (Statistics Canada 2018; Statistics Canada 2023).

The Indigenous unemployment rate across the LSA is higher than the provincial rate by 2%, with Indigenous men having a 6% higher rate of unemployment in the LSA than in BC (Statistics Canada 2018; Statistics Canada 2023). The rate of unemployment for Indigenous women in the LSA is consistent with the rate for the province (Statistics Canada 2018; Statistics Canada 2023). Of the LSA communities, the Indigenous rate of unemployment is highest in Houston at 19%, with Indigenous men having a 26% rate of unemployment and women 14% (Statistics Canada 2018; Statistics Canada 2023).

Indigenous women have lower unemployment rates than Indigenous men in all LSA communities. (Statistics Canada, 2018b, 2023h). Conversely, non-Indigenous women have higher unemployment rates than non-Indigenous men (Statistics Canada, 2018b, 2023h). However, Indigenous women face notably higher unemployment rates than their non-Indigenous counterparts, especially in Smithers where the difference is nearly 11% (Statistics Canada, 2018b, 2023h). Across BC the unemployment rate for Indigenous women is 3% higher than it is for non-Indigenous women (Statistics Canada, 2018b, 2023h).

Visible Minorities

Visible minority statistics are only available for Smithers. At 3%, unemployment rates of visible minorities in Smithers are lower than non-visible minorities, with 0% of visible minority women and 5% of visible minority men experiencing unemployment (Statistics Canada, 2023f). In Smithers, visible minorities have a slightly lower rate of unemployment than non-visible minorities, and visible minority men have higher rates of employment than visible minority women (Statistics Canada, 2023f).⁸

While unemployment levels for visible minorities are low in Smithers, some residents observe that visible minorities more often work for larger corporate chains than they do for local small business employers (C. Seychuk et al., personal communication, October 25, 2023). Whether because of racism, the propensity of large chains to sponsor international workers to immigrate to Canada for employment, or other causes, is unclear.

⁸ 2016 Census of Population does not publish data for labour force characteristics by visible minority in 2016.

Other Factors

While no community-specific quantitative data is available, people with **moderate to severe mental health challenges** have greater challenges gaining and maintaining employment (J. Hagman & S. Lavallie, personal communication, October 24, 2023; C. Seychuk et al., personal communication, October 25, 2023).

People with disabilities face disproportionately low levels of employment in Canada and therefore lower income levels (Statistics Canada, 2023c). These trends are reflected in the LSA, according to local service providers (J. Hagman & S. Lavallie, personal communication, October 24, 2023).

2.4.2 Income

Unemployment and job insecurity are a product of the labour market and various social factors such as education, family income, and ethnicity. Both unemployment and job insecurity are associated with decreased mental wellbeing and increased feelings of anxiety and depression (Russo & Terraneo, 2020).

Census data show that most areas within the LSA had higher average and median after-tax incomes than BC in 2020 (Statistics Canada, 2017a, 2023b) (Table 4). Within the LSA, the Village of Telkwa recorded the highest median after-tax income, while Smithers had the highest average after-tax income growth (Statistics Canada, 2017a, 2023b).

Table 4 Average and median after-tax income, 2020.

	2020					
	Median After-Tax Income			Average After-Tax Income		
	Total	Men	Women	Total	Men	Women
Village of Telkwa	42,800	53,600	35,200	44,200	51,400	36,400
Smithers	41,600	49,600	35,600	46,880	53,650	40,640
Houston	38,800	54,000	31,000	45,320	54,700	35,000
Witset*	28,400	27,000	29,800	32,400	34,500	29,000
BC	37,200	42,400	33,600	45,600	51,900	39,600

Source: (Statistics Canada, 2017a, 2023b)

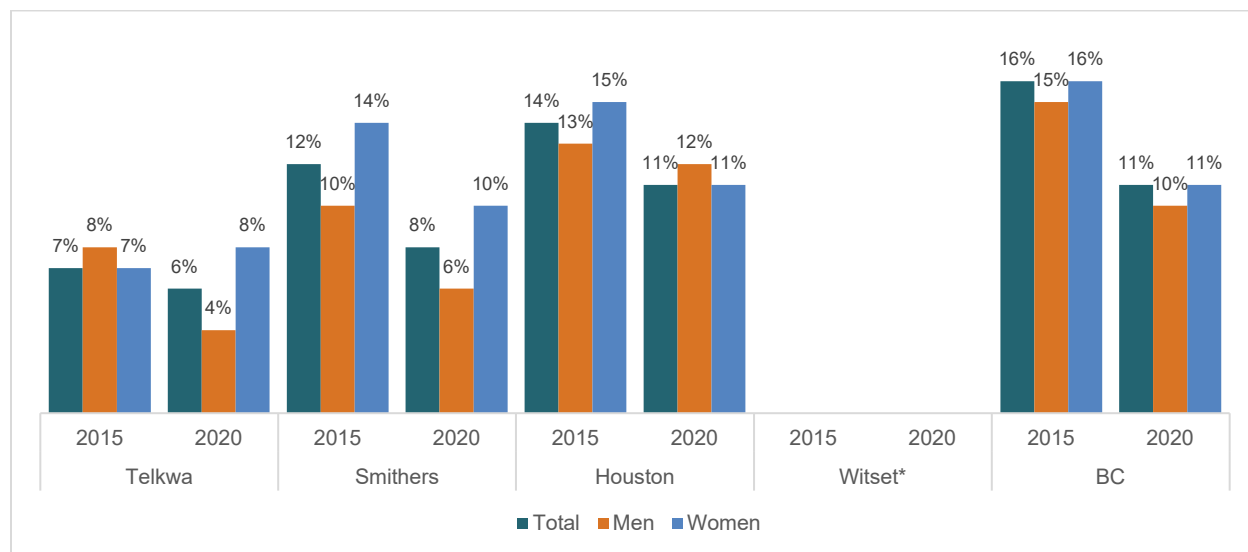
* Only census data for Moricetown 1 Indian Reserve census subdivision were included

The low-income after-tax measure (LIM-AT)⁹ for 2020 shows that the percentage of low-income earners in the Village of Telkwa and in Smithers was lower than that of the province, whereas in Houston it was the same as the province (Figure 3) (Statistics Canada, 2017a, 2023b). Houston recorded the highest percentage of low-income earners in the LSA. From 2015 to 2020, the percentages of low-income earners in all areas within the LSA decreased to 4% (Statistics Canada, 2017a, 2023b). Despite a considerable decline in percentages of low-income households in the LSA, there was a steep increase of people applying for income assistance in the past year, especially in Houston (A. Ridgeway, personal communication,

⁹ Low Income Measure, after tax (LIM-AT) is used by Statistics Canada to establish a threshold of low-income identification which allows comparison of individuals across different household sizes (Statistics Canada, 2017c). When the after-tax income of household pertaining to a person falls below the threshold applicable to the person based on household size, the person is low-income according to LIM-AT.

October 23, 2023). Increasing housing expenses, electricity bills and prices of food, as well as lack of transportation to access employment and services were among the key drivers of heightened pressure on low-income earners in the LSA (S. Cote & P. Zacharias, personal communication, October 25, 2023; J. Hagman & S. Lavallie, personal communication, October 24, 2023).

Figure 3 **Prevalence of low income based on the Low-Income Measure, After Tax (LIM-AT).**



(Statistics Canada, 2017a, 2023b)

Women

Between 2015 and 2020, the gender income gap narrowed substantially in all areas within the LSA (Statistics Canada, 2017a, 2023b). Still the disparity in income between men and women in all communities in the LSA was greater than that of BC, particularly in Houston where non-Indigenous men earn 60% more than non-Indigenous women, and Indigenous men earn 84% more than Indigenous women (Statistics Canada, 2017a, 2023b).

The percentage of women with low income is higher than that for men in the Village of Telkwa and Smithers. Within the LSA, only the Village of Telkwa experienced an increase in the percentage of women with low-income between 2015 and 2020, while the opposite occurred in Smithers and Houston (Statistics Canada, 2017a, 2023b).

Indigenous Populations

Indigenous women and non-Indigenous women make similar incomes across the LSA, but both consistently make substantially less than non-Indigenous men (Statistics Canada, 2017a, 2023b).

Seniors

Seniors in BC are facing more income challenges with growing cost of living and stagnated government supports and pensions. In 2019, the median income for seniors was 66% lower than that of the prime working age population (Office of the Seniors Advocate, British Columbia, 2022). As cost of living continues

to rise, a growing number of recently retired seniors are seeking income support or using public services for food and housing assistance (L. Niessen & N. Wilkinson, personal communication, October 23, 2023; A. Ridgeway, personal communication, October 23, 2023).

Other Factors

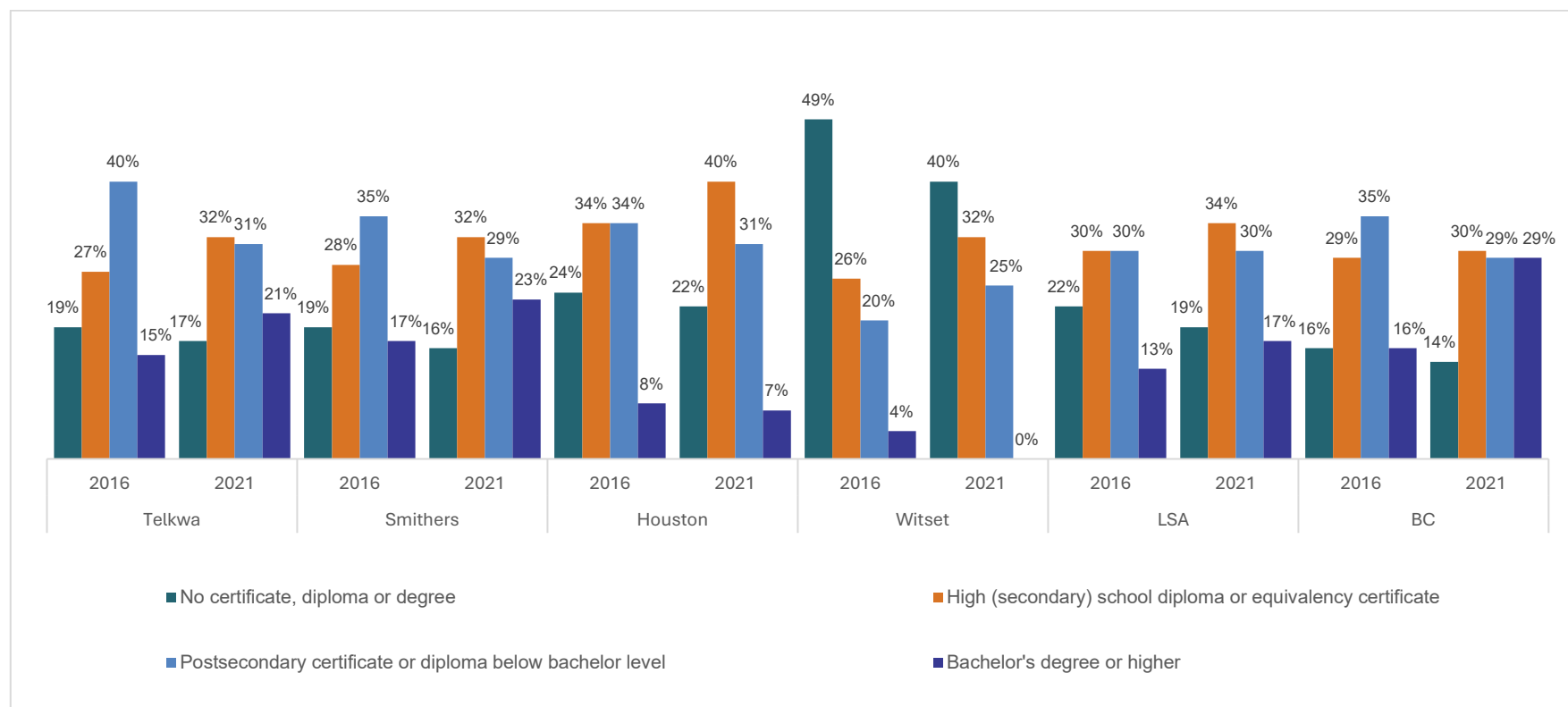
People with disabilities face disproportionately low levels of employment in Canada and therefore lower income levels (Statistics Canada, 2023c). BC-wide, people with disabilities experience worse outcomes relative to other Canadians, including higher rates of poverty and unique barriers to full participation in society. The poverty rate for single persons with disabilities in BC is 35% (B.C. Ministry of Social Development and Poverty Reduction, 2018). These provincial trends are reflected in the LSA, according to local service providers (J. Hagman & S. Lavallie, personal communication, October 24, 2023).

2.4.3 Education

Individuals who do not obtain a certificate of graduation face unfavorable outcomes including lower employment rates, lower wages, job satisfaction, and lower life expectancies (Kristoffersen, 2018; Statistics Canada, 2020). Post-secondary education is critical for reducing poverty, increasing shared community prosperity, and creating a workforce that is equipped to weather economic shifts and maximize economic opportunities (The World Bank, 2021).

All LSA communities had lower rates of post-secondary educational attainment than BC as a whole. In BC, the largest cohort were those who had attained a post-secondary certificate, diploma, or degree, whereas for the LSA the largest cohort was those who graduated with high school diplomas or equivalency certificates (Figure 4) (Statistics Canada 2017a; Statistics Canada 2023a). As of 2021, the majority of people in the LSA – 53% – do not have a post-secondary degree, which tends to put a community at a disadvantage during times of economic change or uncertainty and/or in competing for economic opportunities (The World Bank, 2021). Since people in the LSA have lower educational attainment than the totals for BC, employers in the RSA find it difficult to find employees with the right skill sets, citing lack of training or education as the most common barrier to employment for both jobs seekers and employers (Telkwa Coal Ltd., 2022b). For more information see **S05-C1 Labour Market VC**.

Figure 4 Highest educational attainment, 2016 and 2021.



Source: (Statistics Canada, 2017a, 2023b)

Women

Although women in the LSA had higher rates of attaining bachelor's degrees than men in each community, they still had lower rates of attaining post-secondary education as a whole. This pattern ran contrary to trends in British Columbia where women had slightly higher rates of attaining post-secondary education (Statistics Canada 2017a; Statistics Canada 2023a). At 6%, Houston had the greatest disparity between men and women's post-secondary educational attainment (Statistics Canada, 2023b). Witset was the one community where women have a higher rate of post-secondary educational attainment (Statistics Canada, 2017a, 2023b).

Indigenous Populations

Indigenous people had lower educational attainment at post-secondary levels than non-Indigenous people throughout the LSA (Statistics Canada, 2017a, 2023b). The largest cohort of Indigenous and non-Indigenous people in the LSA were those who have attained a high school diploma or certificate equivalency. From 2016 to 2021, the proportions of Indigenous people with a high school diploma or equivalency certificate increased by 8% (Statistics Canada 2018; Statistics Canada 2023).

In the LSA, Indigenous and non-Indigenous women attain a bachelor's degree or higher at a higher rate than men which aligns with trends of educational attainment between men and women throughout BC (Statistics Canada 2018; Statistics Canada 2023).

Visible Minorities

In Smithers, visible minorities are at a slight disadvantage according to educational attainment rates. Visible minorities have a 3% higher representation of those who have not attained any post-secondary degree or certificate, compared to non-visible minorities. This is contrary to trends in greater BC, where visible minorities have a 3% lower representation of those without a post-secondary certificate or degree, compared to non-visible minorities (Statistics Canada, 2022d). Visible minority women have a 9% lower representation than men of those without a post-secondary degree or certificate (Statistics Canada, 2022d).

2.5 COMMUNITY INFRASTRUCTURE AND SERVICES

2.5.1 Child Care

As described in the 2022 Tenas Project EAC submission, childcare facilities across the LSA are currently at capacity and the demand for childcare has been trending upward. For more information on available services please see **S6.0-3-C Infrastructure and Services VC**.

Women

Women are more likely to be the primary child caregiver and are more likely than men to become single parents (approximately 80% of families with one parent in Canada are headed by women). As a result, lack of child care services disproportionately limits their participation in employment opportunities (Aalhus, Oke, et al., 2018; Statistics Canada, 2018a; Stienstra et al., 2017). Lack of child care can also inhibit women from pursuing further education (Stienstra et al., 2017).

2.5.2 Housing

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to housing, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

Housing plays a substantial role in an individual's wellbeing and can have an impact on the greater community as well. Lack of housing or poor-quality housing can negatively impact both mental and physical wellbeing and influence many other social determinants of health including employment, access to food, and education (Mikkonen & Raphael, 2010).

Housing Cost

The cost of housing has increased dramatically in all communities across the LSA. While the median dwelling value in 2021 in Smithers is over \$175,000 more than in Houston, the median value of dwellings in Houston has increased by 49% since the previous census, more than any other community in the LSA. Still, the increase median dwelling values in all LSA communities remain less than increase of costs in greater BC during the same time, which was 57% (Statistics Canada, 2017b, 2023b).

With a 20% increase between 2016 and 2021, rent has increased the most in Smithers (Statistics Canada, 2017b, 2023b). This is twice the rate of increase in BC (Statistics Canada, 2017b, 2023b). Rent remains the highest in the Village of Telkwa at \$230 a month more than Smithers, and \$455 more a month than Houston (Statistics Canada, 2017b, 2023b).

Counter to expectations, rates of people living in unaffordable housing, defined as spending more than 30% of household income on shelter costs, decreased throughout the LSA and BC between 2016 and 2021 (Statistics Canada, 2017b, 2023b). The proportions of the population who spent 30% or more of their before-tax income on housing in the LSA were lower than the provincial level (Statistics Canada, 2023g).

Housing Stock

Houston has more affordable housing, but more housing in poor conditions than Smithers (9% and 6%, respectively) (Statistics Canada, 2017b, 2023b). People in Houston report houses in need of serious repairs, and landlords unresponsive to requests for help (Dze L K'ant Friendship Centre Society, 2022) (A. Ridgeway, personal communication, October 23, 2023).

Housing Insecurity

Increases in the cost of housing, combined with inflation, has led to greater numbers of homeless people throughout BC and the LSA (BC Housing, 2022). Only Smithers participated in the homelessness counts of 2021 and 2023 (due to its higher population and role as a service hub).

The 2023 Homelessness Services Association of BC (HSABC) homeless count identified 57 homeless people, up from 33 in 2021 and 29 in 2018 (Homelessness Services Association of BC, 2021, 2023). It is important to note that this is an underestimation due to the difficulty of recording homelessness.

In both years of the homelessness count, men were over-represented, which aligns with greater trends in BC and Canada (Homelessness Services Association of BC, 2021, 2023).

Women

Across the LSA women live in unaffordable housing more than men, except for Indigenous women in Smithers where a slightly smaller percentage of Indigenous women live in unaffordable housing (Statistics Canada, 2023g). Considering similar trends in greater BC, this phenomenon relates to income disparities between men and women, and to women making up a disproportionate percentage of single parents (Hyslop, 2020).

Indigenous Populations

Indigenous people face unique barriers navigating competitive housing markets. Indigenous people can have more difficulty in providing references when applying for rentals—having recently lived with either family or on reserve (Dze L K’ant Friendship Centre Society, 2022). Indigenous people also report discrimination and racism as a barrier to equal housing access. This discrimination is observed in extra requirements for applications or being put on waitlists when non-Indigenous people were not (Friendship Centre Society 2022). A recent study on urban Indigenous residents reported 10-year waitlists for social housing in Smithers (Dze L K’ant Friendship Centre Society 2022).

Indigenous people in the LSA have similar or higher total rates of living in unaffordable housing than non-Indigenous, a trend that differs from BC where a lower percentage of Indigenous people live in unaffordable housing than non-Indigenous (Statistics Canada, 2023g).

Still, Indigenous people are overrepresented in homeless counts across BC. In Smithers, 83% of homeless individuals identified as Indigenous in 2023 and 93% in 2021 (Homelessness Services Association of BC, 2023).

One third of the Indigenous population of the Village of Telkwa live in unaffordable housing, which is more than any other LSA community (Statistics Canada, 2023g). When disaggregated by gender, Houston had the greatest disparity between the proportion of Indigenous women and men living in unaffordable housing.

Visible Minorities

The proportions of visible minorities who spent 30% or more of their before-tax income in the LSA were lower than the provincial level (Statistics Canada, 2023g). Smithers had the highest proportion of visible minority population living in unaffordable housing (19%) (Statistics Canada, 2023g).

Across all communities in the LSA and BC, visible minority and non-visible minority women were more likely to live in unaffordable housing than visible minority and non-visible minority men (Statistics Canada, 2023g). Smithers had the highest disparity between visible minority women and men living in unaffordable housing (Statistics Canada, 2023g). In contrast, the Village of Telkwa had the highest disparity between non-visible minority women and men (Statistics Canada, 2023g).

According to recent homeless counts, people with visible minority status were slightly over-represented in Smithers, with 7% identifying as Black or unspecified (Homelessness Services Association of BC, 2023).

2SLGBTQI+

Members of the 2SLGBTQI+ community in Canada are disproportionately homeless or at risk of becoming homeless, or in core housing need (Elver, 2022).¹⁰ 2SLGBTQI+ community members in Smithers report being more vulnerable to discrimination in applications for housing, depending on the views of the landlord (P. Rath et al., personal communication, 2024). Of homeless people in Smithers, 8% identified as 2SLGBTQI+, 5% as “having trans experience” (Homelessness Services Association of BC, 2023).

Seniors

All LSA communities have an aging population. With an aging population, there are concerns about the lack of senior-supportive housing and a need for subsidized rental housing (Sparc BC, 2020; Telkwa Coal Ltd., 2022e). Designated subsidized housing in the Village of Telkwa and the District are always full with an extensive waitlist (T. Cullis, personal communication, October 24, 2023).

Other Factors

People struggling with **moderate to severe mental health challenges** are disproportionately represented in homeless populations in Smithers and the greater LSA, much as they are throughout Canada. According to the 2023 Smithers homeless count, 75% of people counted struggle with addiction (Homelessness Services Association of BC, 2023). This was the most prevalent health concern reported, just as it was in the 2021 count (Homelessness Services Association of BC, 2021).

People with disabilities are also over-represented in homeless populations across BC and Canada. 44% of people in the 2023 homeless count identified as having a physical disability, while 28% identified as having a learning disability (Homelessness Services Association of BC, 2023). Smithers has a limited supply of houses that can accommodate people with physical disabilities and mobility challenges (Sparc BC, 2020). People with disabilities also experience higher rates of poverty than many other demographics, which also puts them at greater risk for living in unaffordable housing (B.C. Ministry of Social Development and Poverty Reduction, 2018).

2.6 CRIME AND PUBLIC SAFETY

Communities throughout the LSA are located along a transportation corridor, making them more vulnerable to crimes perpetrated by transient people (J. Hagman & S. Lavallie, personal communication, October 24, 2023; C. Seychuk et al., personal communication, October 25, 2023). Several informant interviewees noted that petty crimes like small-scale theft and trespassing had become more prevalent in the last few years (E. Bowen & C. Wiebe, personal communication, October 26, 2023; N. Corporal Fox, personal communication, October 23, 2023). Homeless people who live in the community all year round are not necessarily the cause of the crimes, although they typically receive much of the blame from others in the community (C. Seychuk et al., personal communication, October 25, 2023).

¹⁰ The state of core housing need refers to households living in homes that are a.) unaffordable, i.e., paying more than 30% of their before-tax income on housing, and b.) inadequate given the physical condition of the housing unit and/or unsuitable relative to household size (Canada Mortgage and Housing Corporation, 2019).

Crime rates in the municipalities of Smithers and Houston have been substantially higher than elsewhere in BC since 2017 (Statistics Canada, 2022c). While the municipality of Smithers had a higher crime rate than Houston and rural Smithers from 2016 to 2020, by 2021 the municipality of Smithers and Houston had the same crime rate due to Houston's steadily increasing rate (Statistics Canada, 2022c).

Gendered Violence

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to domestic and/or gendered violence against Indigenous women, girls, and 2SLGBTQI+ people, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

As of 2021 sexual assault was on the rise throughout Canada, with an 18% increase since 2020 (Table 5). This is the highest rate since 1996 (Government of BC, 2023).

Table 5 Intimate partner violence – rate per 100,000.

	BC			Canada		
	Total	Men	Women	Total	Men	Women
Total	1,121.67	1,151.58	1,081.80	1,158.60	1,089.43	1,214.69
Intimate Partner	292.68	126.76	452.66	347.02	151.03	537.75
Non-intimate Partner	857.96	1,034.86	674.93	850.1	952.72	737.75
Unknown	2.69	4.26	1.08	4	4.75	3.11

Source: (Statistics Canada, 2023e)

Intimate partner violence is a common form of gender-based violence specific to instances of abuse perpetrated by a current or former spouse or intimate partner. Intimate partner violence can occur regardless of the sexual orientation of the partners, in many relationship forms, at any point during the relationship or after the relationship has been ended and regardless of whether the partners live or have lived together (Women And Gender Equality Canada, 2022). Intimate partner violence is the leading cause of physical injury to women in Canada between the ages of 15- to 44-years old (Lin Haag et al., 2019).

BC and Canada have similar trends: men are more likely than women to be victims of violence in general, but women who experience violence are far more likely than men to be victims of intimate partner violence. Canada-wide eight in ten victims of intimate partner violence are women. Intimate partner violence is the most common violence that women experience (Statistics Canada, 2019). Women in remote areas of Canada were 7% more likely to have experienced multiple instances of intimate partner violence in the past year than women in non-remote areas (Burczycka, 2022).

Due to confidentiality concerns in smaller communities, rates of domestic and gendered violence are not available below the level of Census Metropolitan Area and therefore not available for LSA communities.

Domestic and gender-based violence are notoriously underreported. However, there has been an increase in domestic violence over the COVID-19 pandemic (P. Batley, personal communication, November 29, 2023; N. Corporal Fox, personal communication, October 23, 2023; A. Ridgeway, personal communication, October 23, 2023; C. Seychuk et al., personal communication, October 25, 2023). More calls to the RCMP are noted in Houston than in Smithers (N. Corporal Fox, personal communication, October 23, 2023). Increased RCMP calls were observed when the Coastal Gaslink camp became operational, but the Coastal Gaslink camp closed late last year (P. Batley, personal communication, November 29, 2023).

Women with disabilities are substantially more at risk for intimate partner violence; of women with disabilities who have been in an intimate relationship, more than half reported experiencing intimate partner violence, compared to 37% of women without disabilities (Women And Gender Equality Canada, 2022).

Indigenous Women

In Canada, Indigenous people are more than twice as likely to experience Intimate Partner Violence than non-Indigenous people. Indigenous women make up 5% of the population of all Canadian women, but 21% of all women killed by an intimate partner between 2014 and 2019 (Women and Gender Equality Canada, 2022b).

The LSA communities are in a region with a history of gendered violence against Indigenous women. Smithers, Witset, Houston and the Village of Telkwa are all located on the 725-kilometre corridor of Highway 16 known as the “Highway of Tears.” Between 1989 and 2006 nine young women went missing or were discovered to be murdered along this route, eight of whom were Indigenous (Carrier Sekani Family Services, 2023).

Intersecting patterns of inequality and racism result in Indigenous women with multiple equity-deserving identities having an even greater risk of experiencing intimate partner violence. 86% of 2SLGBTQI+ Indigenous women identified as having experienced intimate partner violence compared to 59% who were non-2SLGBTQI+ (Women and Gender Equality Canada, 2022b). 74% of Indigenous women with disabilities have experienced intimate partner violence, compared to 46% without disabilities (Women and Gender Equality Canada, 2022b).

2SLGBTQI+

It is not easy to be a member of the 2SLGBTQI+ community in Smithers (J. Hagman & S. Lavallie, personal communication, October 24, 2023; M. Kim, personal communication, October 24, 2023; P. Rath et al., personal communication, 2024; C. Seychuk et al., personal communication, October 25, 2023). As many in the greater community worked to promote acceptance of 2SLGBTQI+ people, harassment toward 2SLGBTQI+ persons has increased, such as vandalism on a public rainbow bench in central Smithers (J. Hagman & S. Lavallie, personal communication, October 24, 2023; C. Seychuk et al., personal communication, October 25, 2023). In 2023 the experience of 2SLGBTQI+ in Smithers mirrored trends in society in both Canada and the United States that seemed to be fueled by online misinformation and hate speech (P. Rath et al., personal communication, 2024).

2.7 COMMUNITY HEALTH AND WELL-BEING

2.7.1 Cost of Living

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 and OW-157 are related to cost of living, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

For description of the cost-of-living baseline conditions in the LSA and greater area please see **S6.0-C5 Community Well-Being Valued Component** chapter in the 2022 Tenas Project EAC submission.

2.7.2 Food Security

Residents of Northern BC have the highest risk of food insecurity in the Province, and the LSA is no exception (Hasdell et al., 2023). Based on the increased use of services in the past two years, food insecurity has increased substantially in the LSA. One Houston organization offering free hot meals throughout the week described serving over four times as many lunches on Mondays in the Fall of 2023 than they had two years before (M. Ellis & J. Williams, personal communication, October 23, 2023).

People in the LSA have difficulty finding quality fresh foods, particularly for those who do not live in Smithers (J. Hagman & S. Lavallie, personal communication, October 24, 2023).

Food security is linked to the availability of subsistence foods but also to cost of living, housing, income, and availability of store-bought foods. Increased costs of housing throughout the LSA leaves less income for groceries (E. Bowen & C. Wiebe, personal communication, October 26, 2023; S. Cote & P. Zacharias, personal communication, October 25, 2023; J. Hagman & S. Lavallie, personal communication, October 24, 2023)

Indigenous Populations

As discussed in the 2022 Tenas Project EAC submission, Indigenous people are more likely than other segments of the population to be dependent on subsistence foods for food security and to be less food secure. As a result, Indigenous people are more sensitive to shifts in food availability, pricing, subsistence foods availability, or cost of living shifts. See **S-6.0 C-5 Community Well-being VC** for more details.

Other Factors

Low-income households are more likely to be food insecure (Statistics Canada, 2023c). This means that **people with disabilities** and **people with moderate to severe mental health challenges** are also more sensitive to shifts in food cost and availability.

2.7.3 Mental Health

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to mental health, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

People throughout the LSA struggle with mental health challenges. Collective mental health has not fully recovered from COVID-19. Mental health in the LSA is, if changing at all, getting worse, not better, particularly with the rate of addictions appearing to increase every year (J. Hagman & S. Lavallie, personal communication, October 24, 2023; L. Niessen & N. Wilkinson, personal communication, October 23, 2023; A. Ridgeway, personal communication, October 23, 2023). Mental health resources are running at or above capacity, which further exacerbates mental health challenges (J. Hagman & S. Lavallie, personal communication, October 24, 2023; L. Niessen & N. Wilkinson, personal communication, October 23, 2023; A. Ridgeway, personal communication, October 23, 2023). The closing of the Canfor mill in Houston in April of 2023 increased stress and mental health issues in the community as some 333 people lost their jobs (CBC News, 2023; Kurjata, 2023) (A. Ridgeway, personal communication, October 23, 2023).

Unregulated drug use has increased since the COVID-19 pandemic, although this aligns with trends throughout BC and Canada (E. Bowen & C. Wiebe, personal communication, October 26, 2023; N. Corporal Fox, personal communication, October 23, 2023; M. Ellis & J. Williams, personal communication, October 23, 2023; J. Hagman & S. Lavallie, personal communication, October 24, 2023; L. Niessen & N. Wilkinson, personal communication, October 23, 2023; A. Ridgeway, personal communication, October 23, 2023). In BC, 2023 had the highest number of unregulated drug-related deaths on record. Northern Health, which is the health authority serving the LSA, had the highest rate of unregulated drug-related deaths in the province (BC Coroners Services, 2024).

For more details on mental health services see **S.6.0-C3 Infrastructure and Services Valued Component**.

Indigenous Populations

As described in the 2022 Tenas Project EAC submission Community Well-being chapter, Indigenous people face inequalities in the social determinants of health such as poverty, unemployment, housing, and food security, which are likely to play a role in mental health challenges experienced by some Indigenous peoples (First Nations Governance Centre, 2018; Telkwa Coal Ltd., 2022e).

Mental health issues and addictions are key health concerns among Indigenous communities rooted in historical experience of various assimilation policies and systemic discrimination such as the Indian Residential School system and the Sixties Scoop. Consequent trauma led to higher rates of suicide, mental health, and addictions issues among Indigenous populations (First Nations Governance Centre, 2018; Telkwa Coal Ltd., 2022e).

Indigenous community members may face other barriers accessing Indigenous-specific mental health services such as having an expired status cards or not having other appropriate or recognized government

identification to prove their identity in applying for a new one (E. Bowen & C. Wiebe, personal communication, October 26, 2023).

For more details on Indigenous Mental Health see **S.6.0 C-5 Community Well-being Valued Component**

2SLGBTQI+

2SLGBTQI+ people have worse health outcomes throughout Canada (Schreiber et al., 2021). Members of the 2SLGBTQI+ community live with “minority stress” every day, meaning must adapt their presentation to societal norms (Solway, 2019). 2SLGBTQI+ people report not feeling safe to express affection to their partners in public, both in the LSA, and many parts of Canada (P. Rath et al., personal communication, 2024; Women and Gender Equality Canada, 2022a). 2SLGBTQI+ people in the LSA, as with elsewhere in Canada, report discrimination in the health care system (P. Rath et al., personal communication, 2024; Women and Gender Equality Canada, 2022a). As a result, 2SLGBTQI+ people already experience worse mental health outcomes (Women and Gender Equality Canada, 2022a).

Other Factors

Low-income families have experienced increased mental health challenges due to and following the COVID-19 health pandemic (J. Hagman & S. Lavallie, personal communication, October 24, 2023).

3.0 ANALYSIS OF PROJECT EFFECTS

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes comment OW-006 is related to positive and negative effects and project effect pathways, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

Potential disproportionate adverse effects on distinct populations are identified and described in this section using analytical themes. Themes of Project-related interactions were determined by an analysis of the project components and activities in relation to existing conditions in the LSA, and common interactions in similar communities for equity-deserving groups.

The potential disproportionate negative Project-related direct and indirect effects to equity-deserving groups include:

- Disproportionate effects to women related to increased demand for daycare facilities;
- Women, Indigenous people, low-income people, people with moderate to severe mental health challenges, and people with disabilities are less likely to see direct benefits from the Project hiring and training processes;
- Disproportionate effects related to increase in housing demands for women, Indigenous people, visible minorities, low-income households, people with mental and physical disabilities, and those with moderate to severe mental health challenges;
- In the event of an increase in domestic violence in the LSA as an indirect effect of the Project, women will be disproportionately impacted;
- Disproportionate effects related to food security, particularly for lower income and Indigenous households who may rely more on subsistence foods;
- Disproportionate effects to people with greater sensitivity to increases in cost of living including Women, Indigenous people, visible minorities, seniors those with moderate to severe mental health challenges, and those with disabilities; and
- Disproportionate effects to the mental health of men employed by the Project, women, Indigenous populations, visible minorities, 2SLGBTQI+ people, seniors, people with disabilities, and people with moderate to severe mental health challenges.

3.1 EMPLOYMENT AND INCOME

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-006 is related to economic benefits that would be generated by the Project and how these benefits would be distributed both within the population and over time, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

Employment and income are important social determinants of health and of both the positive and negative effects of projects in resource communities (Aalhus, Fumerton, et al., 2018; Raphael et al., 2020)

The 21+ year life span of the project will provide long-term, high-paying jobs for Project workers in the LSA (Telkwa Coal Ltd., 2022; Table 6). Numerous positive employment and income-related impacts are anticipated for the LSA. Current and future generations should experience health benefits as a result of better employment opportunities and increased household incomes. Income is a central contributing factor to other health determinants such as food security, early child development, and access to education; children raised in households with higher household income have improved health outcomes (Raphael et. Al. 2020). Some LSA service providers predicted that regular sustained employment and increased access to training could have stabilizing ripple effects on the greater community over future decades (Batley, pers. comm., 2023; Bowen and Wiebe, pers. comm., 2023).

Table 6 Hiring and economic benefits through employment.

Phase	Labour Cost – Contractors	FTE	Labour Cost – Telkwa Mining	FTE	Predicted LSA Employees
Construction	\$12.4 million	118.3	\$1.2 million	9.6	74
Operation	\$1.7 million / year	17	\$13.7 million / year	133	119
Decommission	\$1.1 million	10	\$2.4 million	20.6	39.8
Reclamation	n/a	n/a	\$5.9 Million	18.2	
Post-closure – active	n/a	n/a	\$74,000 / year	1	1
Post-closure – passive	n/a	n/a	\$37,000 / year	<1	1

(Telkwa Coal Ltd., 2022g, 2022b)

The Project will also hire those who have been laid off by the closure or completion of other industrial projects. The recent completion of the Coastal Gaslink construction, and the decline of forestry (recently exemplified by the 2023 closure of the Houston Canfor mill) means that there are skilled laborers in search of work in the LSA. There are also workers living in the LSA who were once employed at the Huckleberry mine but have worked fly-in-fly-out to remote northern mines since Huckleberry closed in 2016. The Project gives the opportunity for these workers to live and work in their home region and remain close to their families and social networks.

While the project will bring high income jobs and increased employment opportunities to the LSA, there are some concerns that the distribution of benefits could follow pre-existing patterns of inequality, and even increase inequality in the LSA, as has occurred with other projects (Larsen et al., 2015; Telkwa Coal Ltd., 2022d). For example, the increased cost of living experienced in resource towns during “boom times”, particularly increased rent costs, can create challenging living conditions for those without high-paying jobs (J. A. Shandro et al., 2011).

A sharp increase in the cost of living during the Construction and Operation phases of the Tenas Coal Mine is not expected because of the Project’s small workforce and emphasis on local hiring of up to 75% of the workforce (Telkwa Coal Ltd., 2022c).¹¹ A smaller workforce and fewer outsiders means that increased demands for housing, goods, and services will be kept to a minimum. There will also not be a sudden increase as the maximum workforce for the Construction and Operation phases will build up slowly over a period of several years for each phase (Telkwa Coal Ltd., 2022c). The phased workforce buildup is expected to enable market conditions to shift and adjust over time ameliorating the intensity of a “boom” phase and avoid a “spike” in the cost-of-living, such as often accompanies large projects (Telkwa Coal Ltd., 2022c).

In summary, the project has the potential to provide many social and economic benefits to communities in the LSA. Historical evidence suggests that equitable access to the opportunities presented by mining projects is not guaranteed without proactive measures on behalf of the proponent and government. Telkwa Mining’s mitigation and management plans and commitment to social performance monitoring are expected to foster equitable access to the social and economic benefits of the Project (Section 4.0).

Women

Wealth flows disproportionately to men in Northern and rural Canadian resource communities, rather than women and children (Aalhus, Fumerton, et al., 2018; Amnesty International, 2016). Noting that only 14% of workers in the Canadian mining sector are women, women are expected to benefit less from the positive direct impacts of job hiring and skills training (Natural Resources Canada, 2019). There are many societal reasons behind this lower number, but women also may be apprehensive to join a male-dominated workforce where women feel they must work twice as hard to prove themselves, and face more challenges being promoted than men (McCuaig & Manning, 2016; Murphy et al., 2021).

Women are less likely to be able to work the long shifts required at most mining projects due to shortages of childcare throughout rural BC. In the LSA, single mothers in particular are unable to partake in shift work because of lack of child care (C. Seychuk et al., personal communication, October 25, 2023). Additionally, while accommodating their partners’ long hours away at work and shouldering household duties and child care, women in many Northern BC resource towns find it difficult to work at all, which can lead to total economic dependence on their partners (Aalhus, Oke, et al., 2018). [Indigenous women in rural areas experience these challenges more acutely due to several factors, including limited access to transportation and childcare services](#) (First Nations Information Governance Centre, 2018).

¹¹ For more information on size and rational of work force please see Section 6.0-C1 Demographic VC.

Indigenous Populations

Telkwa Mining is specifically targeting employment for approximately 15% of Wet'suwet'en First Nation workforce (Telkwa Mining Ltd., 2025). In addition, Telkwa Mining aims to allocate 5% of procurement opportunities to Indigenous-owned businesses that employ at least 5% Indigenous people. This approach to subcontract with Wet'suwet'en First Nation and Indigenous-owned businesses represents approximately \$1 million (CAD) of Project contracts during the Construction phase and \$2 million (CAD) throughout the Operation phase. If applied to the total spending, contracts could reach approximately \$6 million (CAD) during the Construction phase or \$45 million (CAD) throughout the Operation phase (approx. \$2 million (CAD) per year) (Telkwa Mining Ltd., 2025).

As expressed throughout the 2022 Tenas Project EAC submission, there are concerns that the economic benefits of the project will be less accessible to Indigenous people, partially due to lower levels of educational and skills attainment. With updated statistical data, this pattern continues to manifest in the LSA and is indeed more pronounced than the broader trends for the province of BC. 33% of Indigenous people in the LSA have no certificate, diploma or degree, while 17% of non-Indigenous people do not. At the other end of the educational spectrum, only 2% of Indigenous people have bachelor's degrees or higher, while 20% of non-Indigenous people have them.

For more details on barriers to Indigenous employment and participation in project-related economic effects, please see Chapter 5.2 Section 5.2.4 of the 2022 Tenas Project EAC submission "Barriers to Indigenous Employment and Participation in Project-related Economic benefits" (Telkwa Coal Ltd., 2022b). Indigenous women tend to receive fewer benefits from natural resource sector employment in Canada. Many projects have special agreements to hire members of local Indigenous communities, but Indigenous people are disproportionately represented in lower-skilled, lower-paying positions (Baruah & Biskupski-Mujanovic, 2023). While more than twice as many Indigenous women as men hold University degrees (a trend maintained throughout the LSA), and a similar percentage have trades degrees and certificates, Indigenous women in resource industries disproportionately work in housekeeping, cleaning, cooking and catering; Indigenous men are more often acquiring higher-paying positions (Baruah & Biskupski-Mujanovic, 2023).

Visible Minorities

Visible minorities may have less access to Project employment due to lower educational attainment and skills training.

Seniors

Many seniors are retired, or semi-retired and will not be able to take advantage of Project employment.

Other Factors

People with low incomes may also have diminished access to jobs for a variety of reasons including, a lack of relevant skills training, diminished access to transportation, or simply not having a driver's license, official identification and/or funds to purchase PPE (E. Bowen & C. Wiebe, personal communication, October 26, 2023).

Those with mental and physical disabilities have been identified as those who have more difficulty gaining employment and therefore will also benefit less from indirect and induced employment opportunities provided by the Project (J. Hagman & S. Lavallie, personal communication, October 24, 2023).

Those with moderate to severe mental health challenges also have more difficulty gaining and maintaining employment and will also benefit less from indirect and induced employment opportunities provided by the Project (J. Hagman & S. Lavallie, personal communication, October 24, 2023).

3.2 COMMUNITY INFRASTRUCTURE AND SERVICES

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-151 is related to the distinct challenges experienced by individuals living on-reserve and off-reserve, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

An influx of employees and their families for the Project construction and operation phases may increase demand on local infrastructure and services, particularly housing and childcare.

3.2.1 Child Care

As described in the 2022 Tenas Project EAC submission, despite the project's emphasis on hiring a high percentage of local workers, during the Operations phase an increase in demand for childcare is anticipated that some of the workforce is expected to come from outside the LSA. It is assumed that at least some of these in-migrating workers will move to the area with their families (Telkwa Coal Ltd., 2022d). Child care needs in the LSA are already underserved, as they are for most communities across BC (S. Cote & P. Zacharias, personal communication, October 25, 2023; J. Hagman & S. Lavallie, personal communication, October 24, 2023).

Women

Women are particularly sensitive to decreased access to childcare. Lack of child care services disproportionately limits the ability of women to participate in employment opportunities and from pursuing further education and professional training (Aalhus, Oke, et al., 2018; Stienstra et al., 2017).

3.2.2 Housing

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to housing, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

As described in the 2022 Tenas Project EAC submission, population growth resulting from workforce hiring during the construction phase could increase demand on short-term accommodation and rental housing,

potentially resulting in decreased access to housing and accommodation, and increased housing and rental costs (Telkwa Coal Ltd., 2022d). This increase is likely to drive up already escalating housing and rental costs (Telkwa Coal Ltd., 2022a).

Homelessness and housing insecurity is on the rise in the LSA and throughout British Columbia because of increased housing costs and costs of living. Housing affordability and availability are critical social determinants of health, and key pathways of impact for northern and rural resource projects in Canada and British Columbia. Numerous authors have identified that influx of populations with people relocating to work in a project results in reduced housing availability and increased cost of living (Aalhus, Oke, et al., 2018; Amnesty International, 2016; Gibson et al., 2017; J. Shandro, 2014; J. Shandro et al., 2014). People already living in unaffordable housing or who are on the verge of housing insecurity are particularly sensitive to housing and shelter costs increases—such populations are disproportionately women, Indigenous, single parents, people with lower educational attainment, and people with mental or health disabilities (Aalhus, Oke, et al., 2018; ERM Consultants Canada LTD., n.d.).

Women

Women will likely be more sensitive to increased housing costs in the LSA. Across most of the LSA, women live in unaffordable housing more than men largely due to income disparities between men and women, and because women comprise a disproportionately large percentage of single parents (Hyslop, 2020; Statistics Canada, 2023d, 2023a).

Indigenous Populations

Indigenous people, especially Indigenous women and girls, remain more sensitive than non-Indigenous people to increases in housing demand and costs. Indigenous people are over-represented in recent homeless counts, and also with higher percentages living in unaffordable housing than non-Indigenous populations (Homelessness Services Association of BC, 2021, 2023; Telkwa Coal Ltd., 2022a).

Visible Minorities

Visible minorities have more sensitivity to increases in housing costs in the LSA. Almost one in four visible minority women in Smithers are living in unaffordable housing, while 16% of visible minority men live in unaffordable housing (Statistics Canada 2023d; Statistics Canada 2023h).

2SLGBTQI+

2SLGBTQI+ persons are more sensitive to increases in housing costs or decreases in housing availability (P. Rath et al., personal communication, 2024). Members of the 2SLGBTQI+ community in Canada are disproportionately homeless, at risk of becoming homeless, or in core housing need (Elver, 2022). Although there is no LSA baseline data on the relationship between 2SLGBTQI+ community members and housing, 8% of homeless people in Smithers identified as 2SLGBTQI+ and 5% as “having trans experience” (Homelessness Services Association of BC, 2023). LSA residents report discrimination that can extend between landlords and current or potential 2SLGBTQI+ tenants, potentially preventing community members from accessing housing as readily as others (P. Rath et al., personal communication, 2024).

Seniors

All LSA communities have growing senior demographics. With an aging population, there are concerns about the lack of senior-supportive housing and a growing need for subsidized rental housing (Sparc BC, 2020; Telkwa Coal Ltd., 2022e). Designated subsidized housing in Telkwa and the District are always full with an extensive waitlist (T. Cullis, personal communication, October 24, 2023). Seniors in the LSA, therefore, are more sensitive to increased housing costs.

Other Factors

People with moderate to severe mental health challenges are more sensitive to increases in housing costs or decrease in housing availability. People with mental health challenges are disproportionately represented in homeless populations in Smithers, the greater LSA, and throughout Canada (Homelessness Services Association of BC, 2021, 2023).

People with disabilities are more sensitive to increased housing costs. People with disabilities are over-represented in homeless populations across BC and Canada. 44% of people in the Smithers homeless account identified as having a physical disability, while 28% identified as having a learning disability (Homelessness Services Association of BC, 2023). Smithers has a very limited supply of houses that can accommodate people with physical disabilities and mobility challenges (Sparc BC, 2020). People with disabilities also experience higher rates of poverty than many other demographics, which also puts them at greater risk for living in unaffordable housing (B.C. Ministry of Social Development and Poverty Reduction, 2018).

3.3 CRIME AND PUBLIC SAFETY

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-153 is related to the nature of public safety risks in relation to the proposed project which will not have a work camp(s).

Many concerns of negative and disproportionate impacts of resource development are based on the experiences of women and girls in resource communities.

It is important to note that many of the more acute social impacts of resource development in rural and Northern Canada are associated with the presence of work camps that house largely male transient workers who are isolated from their families and usual social support networks. This isolation and lack of connection with local communities, combined with long hours and periodic visits to local communities to “blow off steam” that include binge drinking, drug use, and unsafe sexual practices. These behaviours can result in substantially decreased safety for women and girls in nearby communities (Aalhus, Oke, et al., 2018; Gibson et al., 2017; Manning et al., 2018; National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019).

The Tenas Coal Mine will not have a camp and will be relying on a small workforce with a high proportion of locally based employees who will continue to live and work within their home community and participate within their pre-existing social networks. [Evidence from several studies indicate that the absence of a work camp and the use of a locally based workforce are key mitigating factors \(Aalhus, Oke, et al., 2018; Gibson](#)

et al., 2017; Manning et al., 2018; National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019). These conditions mean that workers will be able to sustain a higher level of well-being despite the demands of shift work. Although, public safety concerns for women and girls remain and should be monitored appropriately, the project is planned in such a way that the risks are considerably lower than for many other projects.

Gendered Violence

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 and OW-154 are related to potential increases in domestic and/or gendered violence against Indigenous women, girls, and 2SLGBTQI+ people, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

Long shifts associated with mining employment can cause tremendous stress to workers and their families. When one parent works long shifts, they may feel disconnected from their family life with virtually all waking hours spent at work or commuting (Manning et al., 2018; J. Shandro, 2014). Meanwhile, housework and childcare duties fall to the parent at home, typically the mother.

In addition to causing intense stress among individuals and families (see Section 3.4.3 on Mental Health below), participation in resource industry employment can increase rates of domestic and gendered violence in communities, and also increase substance use and associated crimes (Amnesty International, 2016; Gibson et al., 2017). Communities that support Canadian resource industries frequently see increases in violence, sexual assault, and rates of sexually transmitted infections (STIs) from the outset of project construction (Aalhus, Fumerton, et al., 2018; J. A. Shandro et al., 2011).

Workers at project construction and operations sites report that working conditions in resource sectors are more difficult for women, visible minorities, indigenous people, and non-gender-conforming people (Amnesty International, 2016; National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019; Stienstra et al., 2017). Women's participation in the resource workforce has increased over the decades, but as of 2018, women were still less than 20% of the natural resource sector (Murphy et al., 2021).

Further, it is possible that other socio-economic impacts could indirectly exacerbate domestic violence in the LSA although increases in cost of living. For example, housing shortages may prevent people, disproportionately women, from leaving abusive relationships for inability to acquire alternative long term housing (C. Seychuk et al., personal communication, October 25, 2023).

Given the trends observed in other resource communities in northern BC, even those without a work camp, it is possible for an increase in gendered and domestic violence during all project phases. If domestic and/or gendered violence were to increase in the LSA, it would disproportionately impact women.

Indigenous Women

Disproportionate impacts to Indigenous women (and Indigenous 2SLGBTQI+ people) are of particular concern. Indigenous women are disproportionately burdened with negative socio-economic impacts of extractive industry development and disproportionately left out of project benefits (National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019; Native Women's Association of Canada, 2020b). Indigenous women are the most common victims of harassment and assault at industrial job sites and work camps (Amnesty International, 2016; Gibson et al., 2017; Manning et al., 2018; National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019). Nationwide Indigenous women also experience higher rates of violent crime due to the trends of violence against Indigenous women (National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019; Native Women's Association of Canada, 2020b).

3.4 COMMUNITY HEALTH AND WELL-BEING

3.4.1 Cost of Living

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 and OW-157 are related to cost of living, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

This subsection describes the nature of the potential disproportionate effects of the Project on distinct populations through potential effects on the cost of living. These effects relate to changes in affordability and availability—notably for housing—that may occur through Project-related population change, wages and spending at the regional level.

There are numerous positive impacts predicted related to the increased income for those working on the Project. For example, high-paying jobs will enable workers and their families to access better housing and food options in the LSA and be better equipped to weather economic ups and downs.

However, the distribution of benefits and burdens of mining activities can be highly uneven at the local, regional, and national levels. Mining towns can become unaffordable for those who do not work in the resources industry or benefit directly from it. As discussed in the VC Community Well-being (S6.0-C5) resource development projects have been linked to the reduced availability and affordability of housing in communities. The in-migration of a Project workforce may increase the demand for housing and accommodation, potentially exacerbating current housing shortages.

Further, wage discrepancies between mining and non-mining workforce can also reduce the spending ability of lower income groups, potentially affecting access to housing if costs escalate. Higher housing spending can also influence the ability to spend on other necessities if prices rise (Organization for Economic Co-operation and Development [OECD] 2019).

Inflation can also be a potential effect of mining development on local communities (Aalhus, Oke, et al., 2018). As such, the presence of non-resident workers may lead to increased consumption and a rise in demand for local goods and services, possibly raising cost-of-living expenses such as food and transportation.

Women

Women are more sensitive to increases in cost of living because they are more likely to be lower income or living in unaffordable housing and also are less likely to access Project employment. (See sections 2.5.2, 2.7.2 above)

Indigenous People

Indigenous People may be more affected by increases in cost of living due to historical factors and/or ongoing systemic barriers that contribute to higher rates of income inequality, housing insecurity, food insecurity and unequal access to educational opportunities (see sections 2.5.2, 2.7.2, 2.4.3 above).

Visible Minorities

Visible minorities are more sensitive to increases in cost of living because they disproportionately live in unaffordable housing, and may be less likely to take advantage of Project or other skilled-labour opportunities due to educational deficits (see sections 2.4.3 and 3.2.2. above).

Seniors

As seniors continue to struggle with low income throughout the LSA and the province, they are more sensitive to increases in costs of living (see sections 2.4.2, and 3.1 above).

Other Factors

Those with moderate to severe mental health challenges are more sensitive to increases in costs of living. People with moderate to severe mental health challenges are more likely to have low incomes, be housing insecure, and to struggle with gaining and maintaining employment (see sections 3.2.2 and 3.1 above).

Those with disabilities are more likely to have low incomes and be housing insecure, and therefore are more sensitive to increases in the cost of living (see sections 3.1 and 3.2.2 above).

3.4.2 Food Security

Food security is tied to subsistence foods but also to cost of living, housing, income, and availability of store-bought foods. Increased costs of housing throughout the LSA leaves less income for groceries (E. Bowen & C. Wiebe, personal communication, October 26, 2023; S. Cote & P. Zacharias, personal communication, October 25, 2023; J. Hagman & S. Lavallie, personal communication, October 24, 2023). An increase in cost of living due to growing housing demands could impact food security for more sensitive groups, particularly lower income people and members of socio-demographic groups who are already more likely to be earning a lower income or are disproportionately experiencing unaffordable or insecure housing. Please see the above Section 3.4.1 Cost of Living for groups who would be disproportionately impacted by changes in food security.

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to the nature and significance of Project effects on Wet'suwet'en food security, traditional harvesting and potential project effect pathways, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

The 2022 Tenas Project EAC submission already identified potential impacts to those who eat subsistence foods. As discussed in the Community Well-being VC (S6.0-C5) and Land and Resource Use VC (S6.0-C4), there are predicted disproportionate impacts from loss of access to subsistence foods for Indigenous community members and Wet'suwet'en First Nations in the LSA.

Other Factors

While Indigenous community members are more likely than non-Indigenous to rely on subsistence foods, others in the LSA also rely on subsistence foods (J. Hagman & S. Lavallie, personal communication, October 24, 2023). There could also be disproportionate impacts to **individuals and families with low incomes** who rely on subsistence foods to supplement their food supply (S. Cote & P. Zacharias, personal communication, October 25, 2023).

3.4.3 Mental Health

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to mental health, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

The development, operation, and closure of mining projects, along with the economic fluctuations they bring, are often linked to an increase in mental health issues within nearby communities. These mental health challenges may arise during the economic “boom” phase due to increased income and extended working hours, or during the “bust” phase because of sudden unemployment and reduced income levels (Aalhus, Oke, et al., 2018). The construction and operations phases are particularly associated with work-related stress due to long hours, increased substance and alcohol use as coping mechanisms, and heightened family stress and tensions (Aalhus, Oke, et al., 2018; Levac et al., 2021).

Resource project workforces are heavily male-dominated and often characterized by cultures that venerate “hypermasculinity”, defined as stereotypical masculine qualities such as ruggedness, daring, toughness, and strength (Charman & O'Connor, 2023). While women's participation in the resource workforce has gradually increased over the years, as of 2018, they still constituted less than 20% (Murphy et al., 2021). Studies show that working conditions in resource sectors are more difficult for women, people of color, Indigenous people, and 2SLGBTQI+ individuals due to harassment and bullying, despite the

implementation of anti-bullying and harassment measures (Amnesty International, 2016; National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019; Stienstra et al., 2017).

The community impact of resource project development often includes an increase in illicit substance and alcohol use (Aalhus, Oke, et al., 2018; Amnesty International, 2016; J. A. Shandro et al., 2011). Notably, the rise in substance use may begin with those employed in resource projects, but then extend to the wider community (P. Batley, personal communication, November 29, 2023). Rural communities near resource projects frequently report increased drug use during the construction and operation phases (Aalhus, Fumerton, et al., 2018; Gibson et al., 2017).

Mental health can also be affected by changes to other Project-related themes of Community Well-being: increased cost of living, decreased food security, and reduced community cohesion.

As a result of these indirect and direct project impacts, the following groups may experience a disproportionate share of mental health impacts:

Men Employed by the Project

Cultures of hypermasculinity can adversely affect men's mental health. Although men working on resource projects do not necessarily suffer more than others, the societal pressure to embody toughness and self-sufficiency often deters men from seeking help for mental health issues such as anxiety, depression, and trauma (Aalhus, Oke, et al., 2018; Stienstra et al., 2017). This environment can foster unhealthy coping mechanisms, such as substance abuse, and increase the likelihood of men becoming perpetrators of violence.

Women

Women are likely more susceptible to experiencing heightened stress as a direct or indirect result of the Project. Women working in resource projects are disproportionately affected by stress due to workplace bullying, harassment, and pervasive bias (Amnesty International, 2016; Hoogeveen et al., 2021; Mining Industry Human Resources Council, 2023). Additionally, women tend to be more sensitive to fluctuations in the cost of living, have less access to shift work and project employment, and are more likely to reside in unaffordable housing (see sections 3.2.2, 3.2.1 and 3.1 above).

The mental health effects of working conditions in resource projects may extend beyond workers to affect their partners and children, particularly women (Manning et al., 2018; J. Shandro, 2014). Women whose partners are employed in resource projects are more vulnerable to emotional distress associated with prolonged partner absences from long shift rotations. The responsibility of managing childcare and housework during these periods can contribute to increased stress levels and social isolation.

Indigenous Populations

Indigenous people are likely to be more susceptible to increases in stress, both indirectly and directly related to the Project (see sections 3.2.2, 2.4.3 and 2.7.2 above). Indigenous people working in resource projects are disproportionately affected by stress due to workplace bullying, harassment, and pervasive bias (Amnesty International, 2016; Hoogeveen et al., 2021; Mining Industry Human Resources Council, 2023). They are also more likely to have lower incomes, reside in unaffordable housing, have lower educational attainment, and face challenges with food security.

Visible Minorities

Visible minorities are likely to be more susceptible to stress, both indirectly and directly related to the Project. Visible minorities across Canada are exposed to higher levels of life stressors (Public Health Agency of Canada, 2022). They are also disproportionately affected by stress when working in resource projects due to workplace bullying, harassment, and pervasive bias (Amnesty International, 2016; Hoogeveen et al., 2021; Mining Industry Human Resources Council, 2023). Visible minorities are also more likely to reside in unaffordable housing and may be less likely benefit from Project employment or other skilled-labour sectors (see sections 3.2.2 and 2.4.3 above).

2SLGBTQI+

2SLGBTQI+ individuals are likely to be more susceptible to stress indirectly and directly related to the Project. Members of the 2SLGBTQI+ community already face poorer mental health outcomes (Women and Gender Equality Canada, 2022a). Moreover, they are disproportionately affected by stress when working in resource projects due to workplace bullying, harassment, and pervasive bias.

Seniors

Seniors are more susceptible to stress related to increases in the cost of living, as they already are more likely to have lower incomes. The high-wage employment opportunities offered by the project are unlikely to mitigate this stress, given that seniors are not the target demographic for such jobs. Which are unlikely to be mitigated by high-wage employment offered by the Project (see sections 3.4.1 and 3.1 above).

Other Factors

People with disabilities are more susceptible to stress, both indirectly and directly related to the project because they are more likely to have lower incomes, live in poverty or unaffordable housing, and face challenges with food security (see sections 2.5.2, 2.4.2 and 3.1 above).

People already living with **moderate to severe mental health challenges** are more susceptible to stress indirectly associated with the Project. People with mental health challenges are more likely to have low incomes, face housing insecurity, and are less likely to secure employment from the Project (see sections 2.5.2, 2.4.2 and 3.1 above).

4.0 MITIGATION MEASURES

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-158 is related to the development of a Gender and Cultural Safety Plan, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

This subsection describes the mitigation measures to address the potential effects of the Project on equity-deserving groups. These measures align with the definition of mitigation provided by the BC EAO (2013), which describes mitigation measures as any practical means or measures taken to avoid, minimize, rehabilitate onsite, and if required, compensate, or offset the potential adverse effects of a project. Mitigation measures incorporate applicable standards, guidelines, and best management practices supported by specific guidance documents.

Table 7 provides intersectional corporate policies that Bathurst Resources Ltd., the parent company of Telkwa Mining Ltd., already has in place for all associated projects.

Table 7 Bathurst Resources Ltd. intersectional corporate policies.

Code of Conduct	This policy applies to employees and directors of the Company and the companies it controls (together with the “Company”) and independent contractors. Any action contrary to this policy will be treated very seriously. The code requires: ▪ Bathurst is an equal opportunity employer that does not discriminate on the basis of sex, race, nationality, national origin, age, impairment, disability, sexual preference, gender identity and transgender status, pregnancy, marital status, family responsibilities, religion beliefs, trade union membership or any other category protected by Canadian Federal or provincial regulations; ▪ The maintaining of a workplace free of discrimination, bullying, harassment, and victimization; and ▪ The Company supports a “zero tolerance” approach to crime and corruption in relation to its operations.
Diversity and Inclusion Policy	Bathurst is committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. The Diversity and Inclusion policy provides a framework for Bathurst to achieve the following objectives: ▪ A diverse and inclusive workforce in which everyone is treated fairly and with respect; ▪ A workplace culture that reflects the company values: Be Safe, Be Real, Be Accountable, Be a Team; ▪ A workforce that best represents the talent available in our local communities; ▪ An inclusive high performing and engaged workforce, where everyone is recognized, developed, and rewarded; and ▪ A workplace that is free from all forms of discrimination and harassment.

(Bathurst Resources Limited, 2024)

Table 7 (Cont'd.)

Diversity and Inclusion Policy (Cont'd.)	Strategies to help achieve the objectives include: ▪ Facilitating a workplace culture that allows flexibility to enhance wellbeing, supporting family needs, and personal and career growth; ▪ Identify and implement strategies and programs to recruit, develop and reward a workforce that represents our wider communities; ▪ Reviewing succession plans to ensure a focus on diversity, with a particular focus on supporting the representation of women at a senior level; and ▪ Ensure all employees are aware of our commitment to diversity to ensure we are all accountable in maintaining a diverse workforce.

(Bathurst Resources Limited, 2024)

4.1 DIVERSE POPULATION-SENSITIVE MITIGATION MEASURES

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 and OW-006 are related to the following issues:

- Potential increases in domestic and/or gendered violence against Indigenous women, girls, and 2SLGBTQI+ people;
- Food security and traditional harvesting;
- Mental health;
- Housing;
- Cost of living; and
- Economic benefits that would be generated by the Project within the population and over time.

Relevant mitigation measures previously discussed in the 2022 Tenas Project EAC submission have been reviewed and modified to accommodate the needs of identified equity-deserving groups. The 2022 Tenas Project EAC submission included some mitigations to address intersectional issues. Table 8 below summarizes these and additional GBA Plus-specific mitigation measures [that will be further defined, managed, and monitored through the Tenas Socio-Economic Management Plan \(SEMP\)](#). Modifications to the original mitigation measures in the 2022 Tenas Project EAC submission are highlighted in bold.

The mitigation measures described below are grounded in the GBA Plus best practices for monitoring and management. These mitigation measures are expected to both increase the likelihood of participation, and retention of people from equity-deserving groups, and prevent and manage disproportionate negative impacts on the greater LSA community. The mitigation measures are expected to be effective immediately following implementation during the Construction Phase and thereafter.

Table 8 **Intersectional mitigation measures.**

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
HEALTH AND WELLNESS PROGRAM (EMPLOYEE AND FAMILY ASSISTANCE PROGRAM)				
Mental Health, Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	Establish and implement policies to promote: no workplace harassment of any kind; environmental protection and awareness; whistle blower protection; health, safety, and security; and multicultural and multi-generational workforce considerations.	Establish and implement policies to promote: no workplace harassment of any kind; environmental protection and awareness; whistle blower protection; health, safety, and security; and multicultural and multi-generational workforce considerations. Collaborate with the Camp Assault Mitigation Project (CAMP) program at the Northern Society for Domestic Peace in Smithers, BC. The CAMP program creates educational material and workshops for resource industry workforces to prevent workplace sexual harassment and assault. The CAMP program will be further engaged to assist Telkwa Mining with the development of policies and procedures.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being
Mental Health, Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	Telkwa Mining will meet all regulatory requirements by implementing the Occupational Health and Safety Program (S13.0-C13) (OHSP). Maintain safety records and report results to BC Ministry of Energy, Mines and Low Carbon Innovation (MEMLI) and designated Indigenous groups.	Telkwa Mining will meet all regulatory requirements by implementing the Occupational Health and Safety Program (S13.0-C13) (OHSP). Maintain safety records and report results to BC Ministry of Energy, Mines and Low Carbon Innovation (MEMLI) and designated Indigenous groups and track against equity-deserving groups identified by the GBA Plus report for internal purposes only.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Mental Health, Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities.		Telkwa Mining will emphasize the resource's provided by Worksafe BC as part of the Health and Wellness program which includes resources to support mental and psychological health.	6.3 Infrastructure and Services 6.5 Community Well-being
Mental Health, Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities.	Implement a Health and Wellness Program (Employee and Family Assistance Program) for employees and selected contractors to promote health and wellness aspects (e.g., sleep habitats, exercise, healthy eating), including resources related to addiction, family planning, stress, abusive relationships, and financial planning. The Health and Wellness Program is part of the Project's OHSP.	Implement a Health and Wellness Program (Employee and Family Assistance Program) for employees and selected contractors to promote health and wellness aspects (e.g., sleep habitats, exercise, healthy eating), including resources related to addiction, family planning, stress, abusive relationships, and financial planning. Participation in these programs of those belonging to an equity-deserving group as identified in the GBA Plus report will be tracked for employees who voluntarily self-identify. Providing personal identity information such as race, ethnicity, or sexual orientation will not be required and, if provided, will only be used for confidential internal purposes to help improve delivery of the Health and Wellness Program. The Health and Wellness Program is part of the Project's OHSP. Counselling offered by the program will include culturally appropriate counselling, i.e., someone experienced in collaborating with Indigenous people and those from other equity-deserving groups. Consult with the Northern Society of Domestic Peace and Northern Health regarding policies and program design for assisting workers with stress management and family relationships.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Mental Health, Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	Implement a third-party phone line for employees via the Employee and Family Assistance Program that can be used by all personnel to report issues related to Telkwa Mining employees on discrimination, harassment, financial irregularities, abuse, and bullying incidents.	Implement a third-party phone line for employees via the Employee and Family Assistance Program that can be used by all personnel to report issues related to Telkwa Mining employees on discrimination, harassment, financial irregularities, abuse, and bullying incidents. Implement a Grievance Redress Mechanism for workers and community members.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being
Mental Health	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	Work with local agencies to assist in monitoring community well-being and take corrective actions where appropriate, including developing a health and well-being program based on guidelines from Northern Health.	Work with local agencies including organizations that represent Indigenous groups and other equity-deserving groups identified by the GBA Plus report to assist in monitoring community well-being and take corrective actions where appropriate, including developing a health and well-being program based on guidelines from Northern Health.	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being
Employment and Income, Mental Health	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities		Develop support groups at the mine for the equity-deserving populations identified by the GBA Plus report and work with these groups to develop strategies to identify and reduce barriers to employment and training, and report progress annually.	5.1 Labour Market 5.2 Economic Development 6.0 Demographics 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
HOUSING AND ACCOMODATION PROGRAM				
Housing, Mental Health	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, low-income individuals and families, seniors	Housing Measures Provide incentives and inducements to developers and partner with government to encourage the development of additional housing stock/supply and diversity of housing in the Socio-economic LSA/RSA.	Housing Measures Provide incentives and inducements to developers and partner with government to encourage the development of additional housing stock/supply and diversity of housing in the Socio-economic LSA/RSA. Provide \$1 million in support for housing initiatives contingent on obtaining \$3 million in funding assistance from government and non-government sources. Specific housing activities will be selected based on a ranking system to be developed in collaboration with local community and Indigenous groups. At least one of the criteria will be aimed at ensuring representation of equity deserving populations in the selection process. Ensure any housing developed supported by Telkwa Mining considers the equity-deserving populations identified by the GBA Plus report.	5.1 Labour Market 5.2 Economic Development 6.0 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being
Housing, Mental Health	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, low-income individuals and families, seniors	The sequence of activities is such that the maximum workforce is not required on the first day of the Construction Phase but is slowly built up over a period of several years. The Operation Phase will have a similar progression regarding the maximum workforce required to be in residence near the Project. Due to the phased progress of activities, Telkwa Mining will also have a phased approach to hiring personnel for the Minesite. This will give time for the housing market to respond with increased construction of temporary and permanent accommodations in the area.	None required.	5.1 Labour Market 5.2 Economic Development 6.0 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Housing, Mental Health	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, low-income individuals and families, seniors	Construction Workforce Accommodation Telkwa Mining will fund the accommodation of non-local experienced personnel that the company requires during the Construction Phase. The following mitigations were developed for this group: ▪ A Request for Proposal (RFP) will be provided to accommodation providers at least six (6) months prior to use by the Project construction workforce, and the RFP will be for a set number rooms for a guaranteed duration of time; ▪ Reservations will be made at various campgrounds and RV parks to allow the Project construction workforce to use some of these facilities; ▪ Discussions with groups in Telkwa, Smithers and Houston for the temporary rental of rooms for the construction workforce will be secured at least six (6) months prior to use; and ▪ Telkwa Mining will endeavor to use local companies to complete most of the construction activities for the Project to reduce the requirement for temporary accommodation.	None required.	5.1 Labour Market 5.2 Economic Development 6.0 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Housing, Mental Health	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, low-income individuals and families, seniors	Permanent Workforce Accommodation The following mitigations were developed for accommodating the permanent workforce for the Operation Phase: - Grants to be used for the purchase or upgrade of permanent local housing will be provided to employees who reach designated milestones with the company; - Telkwa Mining will work with local developers to provide guaranteed rental rates and duration to incentivize the construction of accommodation for permanent employees and communities at large; and - Telkwa Mining will provide transportation from both Houston and Witset if at least six (6) employees reside in these locations to promote alternatives for employees to reside and still be within a reasonable driving distance (less than 90 minutes) from the Project.	None required.	5.1 Labour Market 5.2 Economic Development 6.0 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
COMMUNITY ENGAGEMENT PROGRAM				
Public Safety, Community Cohesion, Cost of Living, Mental Health	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, low-income people and families	Telkwa Mining 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. The Project will develop and implement Community Engagement Programs as part of the Socio-economic Management Plan (SEMP) that will involve continuous engagement with key stakeholder groups most likely to be concerned and affected by the Project, including: - Indigenous groups, including the Office of the Wet'suwet'en (OW), Wet'suwet'en First Nation, and Witset First Nation; - Local and regional authorities and key representatives such as the Village of Telkwa, the Town of Smithers, and the RDBN; 4 local community groups such as Tenas Mine Neighbors and other Bulkley Valley residents; - Local recreation groups; - Local community groups; - Other local non-governmental organizations; and - Members of the local and regional workforce potentially interested in work at the Project.	Telkwa Mining 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. Telkwa Mining will fund community engagement programs for employees, local communities and other interested parties during the Project Construction, Operation and Decommissioning and Reclamation phases (25 years) as part of the Socio-economic Management Plan (SEMP) that will involve continuous engagement with key stakeholder groups most likely to be concerned and affected by the Project, including: - Indigenous groups, including the Office of the Wet'suwet'en (OW), Wet'suwet'en First Nation, Skin Tyee, and Witset First Nation; - Local and regional authorities and key representatives such as the Village of Telkwa, the Town of Smithers, and the RDBN; 4 local community groups such as Tenas Mine Neighbors and other Bulkley Valley residents; - Local recreation groups; - Local community groups; Local service providers for equity-deserving groups identified in the GBA Plus report; - Other local non-governmental organizations; and - Members of the local and regional workforce potentially interested in work at the Project.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Public Safety, Community Cohesion	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, low- income people and families	Community consultation provides an opportunity for stakeholders to express their concerns, ask questions, and get a clearer understanding of Project effects and associated mitigation measures. Sustained stakeholder engagement activities are expected to contribute to positive interactions between the Project and community members from the LSA and the RSA and are likely to foster a climate of collaboration and trust.	Community consultation provides an opportunity for stakeholders to express their concerns, ask questions, and get a clearer understanding of Project effects and associated mitigation measures. Sustained stakeholder engagement activities are expected to contribute to positive interactions between the Project and community members from the LSA and the RSA and are likely to foster a climate of collaboration and trust. GBA Plus is an iterative process; engagement activities provide opportunities for continued monitoring of disproportionate challenges and impacts for equity-deserving groups.	6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being
Public Safety, Community Cohesion, Cost of Living, Mental Health	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, low-income people and families	Building on the Public Consultation Plan, Telkwa Mining's Community Engagement Programs (for Construction, and Operation phases of the Project) will include the following to allow a successful Public Consultation Plan: ▪ Open-door policy; ▪ General engagement meetings and presentations; ▪ Company website; ▪ Social media; ▪ Project tours; ▪ Participation at community and industry events; ▪ Neighbours' group(s); ▪ Project Access Committee; ▪ Project Advisory Committee; and ▪ Sponsorship.	None required.	6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Public Safety, Community Cohesion, Cost of Living, Mental Health	Seniors		Support Seniors through donations and volunteers to assist with senior-based programs and facilities.	6.5 Community Well-being
Food Security	Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, low-income people and families		Provide support and funding for breakfast programs at Telkwa Elementary and Witset School during the Project Operation phase (22 years), contingent on securing government and non-government partners to assist with program delivery.	6.5 Community Well-being
EDUCATION, TRAINING, AND EMPLOYMENT PROGRAM				
Employment and Income	Women, Indigenous populations, visible minorities, low-income people and families	The provision of training is expected to support the development of a skilled and experienced workforce within the LSA and RSA. Such initiatives should take place well in advance of the Construction and Operation phases and continue throughout those phases. Training programs and the support of training opportunities, other than on the job training, will require time to identify and implement. Depending on the job type, required training may take from a few weeks or months to a few years. Thus, early engagement regarding communicating job types and required skills before the initiation of the Project, as well as early collaboration with educational institutions, are essential to make this effort successful.	None required.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Employment and Income, Education	Women, Indigenous populations, visible minorities	Work with training institutions such as local colleges and education providers to provide training programs and skills upgrading. Partner with local contractors to provide Telkwa Mining apprenticeship programs. Identify and train under-represented groups. Offer scholarships and bursaries to encourage high school graduation and encourage groups to participate in science, technology, engineering, and mathematics (STEM) programs at a college, and/or university level. Offer scholarships and bursaries to encourage people to participate in recognized trade programs. Offer scholarships, bursaries, and employment opportunities for dependents of Telkwa Mining employees in post-secondary education institutions. Offer employment opportunities for students in local post-secondary education institutions. Support apprentice programs both onsite and offsite with other industry partners. Report progress in implementing these plans annually to designated Indigenous and stakeholder groups.	Work with training institutions such as local colleges and education providers to provide training programs and skills upgrading for employees and the broader population including equity-deserving groups identified by the GBA Plus report. Partner with local contractors to provide Telkwa Mining apprenticeship programs for employees and the broader population including equity-deserving groups identified by the GBA Plus report. Identify and provide training opportunities to under-represented groups, including equity-deserving groups identified by the GBA Plus report, to support their participation and advancement in employment. Offer scholarships and bursaries to encourage high school graduation and encourage groups including those identified populations by the GBA Plus report to participate in science, technology, engineering, and mathematics (STEM) programs at a college, and/or university level. Offer scholarships and bursaries to encourage people, including those equity-deserving groups identified by the GBA Plus report, to participate in recognized trade programs. Offer scholarships, bursaries, and employment opportunities for dependents of Telkwa Mining employees including those equity-deserving groups identified by the GBA Plus report in post-secondary education institutions.	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Employment and Income, Education (cont'd.)			Offer employment opportunities for students including those equity-deserving groups identified by the GBA Plus report in local post-secondary education institutions. Support apprentice programs including for equity-deserving groups identified by the GBA Plus analysis both onsite and offsite with other industry partners. Financial Support for food and housing families of individuals in training courses. Report progress in implementing these plans annually to designated Indigenous and stakeholder groups including organizations that serve the equity-deserving groups identified by the GBA Plus report.	
Employment, Income	Indigenous populations	Work with Indigenous groups to develop a strategy to identify and reduce barriers to employment and training, and report progress annually to designated Indigenous groups. Support the training of Indigenous people and cooperate with programs such as Indigenous Skills and Employment Training (ISET) to improve access to funding for Indigenous individuals and support skill building of the Indigenous workforce in the RSA.	None required.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being VC

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Employment, Income	Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, newcomers		Support the training of women and cooperate with programs such as BC Centre for Women in the Trades (BCCWITT) to improve access to funding and skill building support for women, Indigenous people, racialized people, 2SLGBTQI+, people with disabilities, and newcomers in the RSA. <i>While participation in training does not guarantee permanent employment with Telkwa Mining, it is intended to enhance employability and support long-term career development within the industry.</i>	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being VC
Employment and Income, Childcare	Women	Telkwa Mining will fund at least one (1) full-time position at a government approved child care facility in the Regional District of Bulkley-Nechako (RDBN) that will be selected by Telkwa Mining via an application process, with the provision that additional matching full-time positions are funded by government sources, and that preference is given to children of Telkwa Mining employees for additional capacity created. Telkwa Mining will also fund at least one (1) full-time position with Indigenous groups at an approved child care facility operated by an Indigenous group in the region that will be selected by Telkwa Mining via an application process, with the provision that an additional matching full-time position is funded from Indigenous and/or government sources, and that preference is given to children of Telkwa Mining Indigenous employees first, and then Telkwa Mining nonindigenous employees for additional capacity created. The Child Care Program is part of the Education, Training, and Employment Program presented in the SEMP.	None required.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being VC

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Employment and Income	Indigenous populations	Improve the participation of Indigenous-owned businesses in the procurement process.	Engaging with Indigenous business to understand how to enable their successful participation in procurement process. Conducting business information sessions with Indigenous-owned businesses to discuss Project bidding processes and business opportunities to increase participation and successful bidding.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being VC
Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	Communication Measures Establish temporary Project recruitment offices in the Village of Telkwa, Smithers, Houston, and Witset prior to commencement of the Construction Phase. Communicate Project schedules and the type and number of jobs to be required by phase, including required skills, education, responsibilities, and compensation. Advertise employment opportunities for potential employees within the RDBN and contractors well in advance to provide job seekers with improved opportunity to obtain skills to qualify for employment and contracts at the Project. Set and communicate local employment objectives to maximize local employment and income benefits, including employment for Indigenous workers and other vulnerable groups.	Communication Measures Establish temporary Project recruitment offices in the Village of Telkwa, Smithers, Houston, and Witset prior to commencement of the Construction Phase and ensure equity-deserving group members are part of the recruitment team. Communicate Project schedules and the type and number of jobs to be required by phase, including required skills, education, responsibilities, and compensation early and widely. Advertise employment and contracting opportunities for potential employees and contractors within the RDBN, and contractors well in advance to provide job seekers with improved opportunity to obtain skills to qualify for employment and contracts at the Project. Set and communicate local employment objectives to maximize local employment and income benefits, including employment for	6.0 Demographics 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Employment and Income (cont'd.)		Host Employment Information Sessions in LSA/RSA communities during the Construction Phase of the Project, to provide information about the opportunities associated with Project employment.	Indigenous workers and other equity-deserving groups identified by the GBA Plus analysis; and host Employment Information Sessions in LSA/RSA communities, at Indigenous representative offices and at organizations that represent equity-deserving populations identified during the GBA Plus report during the Construction Phase of the Project, to provide information about the opportunities associated with Project employment. To provide job seekers with an improved opportunity to obtain skills to qualify for Project employment and contracts, advertise in advance for employment and contracting opportunities for Indigenous groups and equity-deserving populations identified in the GBA Plus report.	
Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people and families with low income	Use buses and/or vans for employees and contractors as much as practical to reduce the risk of traffic incidents, and to reduce noise and fugitive dust emissions generated by the Project. Bussing options to Witset and/or Houston to be provided (if requested, and based on sufficient employees are in these locations) to facilitate potential employees accessing employment opportunities with the Project.	Use buses and/or vans for employees and contractors as much as practical to reduce the risk of traffic incidents, reduce noise and fugitive dust emissions generated by the Project, and increase accessibility of employment for those without personal transportation. Bussing options to Witset and/or Houston to be provided (if requested, and based on sufficient employees are in these locations) to facilitate potential employees accessing employment opportunities with the Project.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Mental health, Employment and Income, Public Safety	Indigenous populations	Indigenous Cultural Awareness Induction Indigenous Cultural Awareness Induction is a practice that is becoming more common for mining projects in Canada with the objective to improve the hiring and retention of workers from vulnerable groups or minorities. Indigenous Cultural Awareness Induction can improve cultural awareness by helping employees to respond to their own unconscious or hidden bias, act in a culturally appropriate manner defined company-wide and improve communication and decision-making. This induction process is expected to improve the hiring and retention of Indigenous workers, and workers from other minorities or vulnerable groups.	Indigenous Cultural Awareness Induction Indigenous Cultural Awareness Induction is a practice that is becoming more common for mining projects in Canada with the objective to improve the hiring and retention of workers from vulnerable groups or minorities. Indigenous Cultural Awareness Induction can improve cultural awareness by helping employees to respond to their own unconscious or hidden bias, act in a culturally appropriate manner defined company-wide and improve communication and decision-making. This induction process is expected to improve the hiring and retention of Indigenous workers, and workers from other minorities or vulnerable groups. The Indigenous cultural induction will be developed in collaboration with the Wet'suwet'en peoples.	5.1 Labour Market 5.2 Economic Development 6.0 Demographics 6.5 Community Well-being
	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities		People in Mining Awareness Induction People in Mining Awareness Induction strives to improve the hiring and retention of workers from equity-deserving groups. People in Mining Awareness Induction helps employees to respond to their own unconscious or hidden bias, act in a culturally appropriate manner defined company-wide and improve communication and decision-making. The Induction will educate employees and contractors on how to collaborate effectively with colleagues from diverse backgrounds and strengthen workplace relationships.	5.1 Labour Market 5.2 Economic Development 6.0 Demographics 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Mental Health, Employment and Income, Public Safety (cont'd.)			This induction process is expected to reduce bullying and harassment, increase cultural safety and awareness on the work site, and improve the hiring and retention of workers from equity-deserving groups.	
Employment and Income	Women, Indigenous populations, visible minorities, low income		Allowing individuals without a grade 12 diploma and/or valid driver's license to still be accepted for interviews and hiring by the Project.	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being
DECOMISSIONING, RECLAMATION, AND POST-CLOSURE PROGRAM				
Cost of Living, Food Security	Indigenous populations, people and families with low-income	Revegetate with native plant species appropriate for the target ecosystems, which will include species for merchantable timber, subsistence foods, and ceremonial purposes in consultation with the Wet'suwet'en.	Conduct annual field tours with Indigenous groups to identify proposed mining and reclamation activities for the next 12 months. Conduct annual field tours with Indigenous groups to identify completed mining and reclamation activities for the next 12 months. Revegetate with native plant species appropriate for the target ecosystems, which will include species for merchantable timber, subsistence foods for establishment of wildlife important to hunting, and any vegetation, features, and wildlife of significance to ceremonial purposes in consultation with the Wet'suwet'en.	6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Cost of Living, Food Security, Employment and Income	Women, Indigenous, visible minorities, 2SLGBTQI+, people with disabilities	Provide financial education programs for employees so that they understand requirement planning and saving. Provide information about the Project schedule to local economic development organizations. Provide ongoing information about Project operation and labour projections, reclamation, and closure to local economic development organizations. Put in place Legacy Fund to provide funding and training opportunities for community after Project is completed. Put in place Intergenerational Trust Fund for Wet'suwet'en to provide funding and training opportunities for community after Project is completed.	Provide and fund financial education programs for employees during the Project Operation Phase (22 years) to support general financial literacy, help employees and their families develop personal financial management skills and encourage retirement planning and saving. The program is part of the overall suite of benefits provided to employees and their families up to two training sessions per employee per annum. Provide information about the Project schedule to local economic development organizations including those which represent equity-deserving groups identified during the GBA Plus report. Provide ongoing information about Project operation and labor projects, reclamation, and closure to local economic development organizations including those which represent equity-deserving groups identified during the GBA Plus report. Provide information about the Project schedule to local post-secondary institutions and trade schools. Put in place Legacy Fund to provide funding and training opportunities for community after Project is completed. Put in place an Intergenerational Trust Fund for Wet'suwet'en to provide funding and training opportunities for community after Project is completed.	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Cost of Living, Food Security, Employment and Income (Cont'd.)	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	Phased approach to reducing the workforce over several years. To have a skill matrix for all employees provided every two (2) years after employee is hired. To complete a training program for every employee for subsequent positions at the mine and alternative industries and occupations. To complete a transition plan for every employee who will be less than 50 years old when the mine is planned to close. Have a matching RRSP program for employees to ensure sufficient retirement savings for employees using any overtime income to reduce taxable income and on all regular income. Have retention bonus program and long-term service bonus program for employees. Provide all employees with transitional services well in advance of closure. Provide severance packages or working notices for employees in line with their employee contractors who are eventually laid off due to closure. Self-perform as many decommissioning and reclamation activities as possible to maintain as much of a workforce for as long as possible.	Phased approach to reducing the workforce over several years. Provide financial planning, job search support, enhanced mental health support, and other supports to workers that could facilitate the transition to another position or put them in a better position from which to manage job cessation. To have a skill matrix for all employees provided every two (2) years after an employee is hired. To complete a training program for every employee for subsequent positions at the mine and alternative industries and occupations. To complete a transition plan for every employee who will be less than 50 years old when the mine is planned to close. Have a matching RRSP program for employees to ensure sufficient retirement savings for employees using any overtime income to reduce taxable income and on all regular income. Have a retention bonus program and long-term service bonus program for employees. Provide all employees with transitional services well in advance of closure. Provide severance packages or working notices for employees in line with their employee contractors who are eventually laid off due to closure. Self-perform as much decommissioning and reclamation activities as possible to maintain as much of a workforce for as long as possible.	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Cost of Living, Food Security, Employment and Income (Cont'd.)	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	Work with other industries and other mining companies to identify transitional and work path opportunities for employees to obtain future employment opportunities. Provide small business loans annually up to \$100,000 for groups to start up in-need services and provision of goods and tourism in the region.	Work with other industries and other mining companies to identify transitional and work path opportunities for employees to obtain future employment opportunities. Provide small business loans annually up to \$100,000 for groups to start up in-need services and provision of goods and tourism in the region, including equity-deserving groups.	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being
	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	Additional engagement through Tenas Mine Advisory Committee on specific activities and programs the mine can support and undertake to reduce the effect that closure would have on the community and the region. Implement 1-800 phone line for public and government agencies. Implement website reporting and engagement portal.	Additional engagement through Tenas Mine Advisory Committee on specific activities and programs the mine can support and undertake to reduce the effect that closure would have on the community and the region. Engage with the local communities and equity-deserving groups on mine closure to understand issues relating to Project-induced population change associated with Project closure. Implement 1-800 phone line for public and government agencies. Implement website reporting and engagement portal.	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being

Table 8 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Mitigation Measures in the Submitted Application	Revised Intersectional Mitigation	Relevant VC Chapters
Food Security	Indigenous populations	The Project will be decommissioned and reclaimed to design-specifications to provide a safe and stable end-landscape that aligns with end-land use objectives in accordance with the (Reclamation Plan) RCP. A Subsistence Food Management Plan will be developed as part of the RCP at least three (3) years prior to the end of the Operation Phase, 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 the Decommissioning and Reclamation Phase (i.e., three (3) years prior to Year 21).	None required.	6.5 Community Well-being

4.2 MONITORING, MANAGEMENT, AND EVALUATION

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-006 and OW-159 are related to the uncertainty in conclusions about Project effects on distinct human populations and enhanced strategies to reduce barriers faced by equity-deserving groups in employment and training, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

The below monitoring, management and evaluation actions have been revised to be more inclusive of identified equity-deserving groups (Table 9).

Table 9 Intersectional monitoring, management, and evaluation measures – Socio-Economic Management Plan (SEMP).

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
HEALTH AND WELLNESS PROGRAM (EMPLOYEE AND FAMILY ASSISTANCE PROGRAM)				
Mental Health, Public Safety	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	Health and Wellness Program: The following will be monitored and reported on to assist with evaluating the success or deficiency of this program: - Number of lost time incidents, medical aids, high potential risks and fatalities; - Results of minesite emergency practice drills or actual deployments; - Number of employees making use of the health and wellness accounts and funds used; - Overall trends of performance indicators for employee health and wellness, based on annual medical monitoring program; and	Health and Wellness Program: Telkwa Mining will fund the Health and Wellness Program during the Project Operation phase (22 years), offering benefits to employees and their families up to a maximum of \$1,200 per employee per year if they satisfy the requirements of the program which will be developed with the Joint Occupational Health and Safety Committee. The following will be monitored and reported on to assist with evaluating the success or deficiency of this program, including for those from equity-deserving groups. Providing personal identity information such as race, ethnicity, or sexual orientation will not be required and, if provided, will only be used for confidential internal purposes to help improve delivery of the Health and Wellness Program:	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being

Table 9 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
Mental Health, Public Safety (Cont'd.)		Number and value of sponsorship and donations provided to the region and groups selected for these funds.	- Number of lost time incidents, medical aids, high potential risks, and fatalities; - Results of Minesite emergency practice drills or actual deployments; - Number of employees making use of the health and wellness accounts and funds used; - Overall trends of performance indicators for employee health and wellness, based on annual medical monitoring program; and - Number and value of sponsorship and donations provided to the region and groups selected for these funds.	
	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, seniors	Work with local agencies to assist in monitoring community well-being and take corrective actions where appropriate, including developing a health and well-being program based on guidelines from Northern Health.	Work with local agencies, including those that represent Indigenous groups and populations identified by the GBA plus report to assist in monitoring community well-being and take corrective actions where appropriate, including developing a health and well-being program based on guidelines from Northern Health and consultation with the Northern Society for Domestic Peace CAMP program. Ensure membership of identified populations from the GBA Plus report on the Joint Occupational Health Committee, Mine Rescue teams, supervisory training, and advanced environmental and/or safety designations. Continue to engage the community to define and refine gender-sensitive and equity-deserving group enhancement measures. Implement a Grievance Redress Mechanism for workers and community members.	5.1 Labour Market 6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 9 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
HOUSING AND ACCOMODATION PROGRAM				
Mental Health, Housing	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, seniors	The following will be monitored and reported on to assist with evaluating the success of this program: - Number of rooms acquired and used; - Number of construction employees, origin of location and company; - Amount of funds used by employees for securing permanent accommodation; - Number of housing units developed through TCL's assistance; and - Number and origin of location for employees.	The following will be monitored and reported on to assist with evaluating the success of this program: - Number of rooms acquired and used; - Number of construction employees, origin of location and company; - Amount of funds used by employees for securing permanent accommodation; - Number of housing units developed through TCL's assistance; - Number and origin of location for employees; and Feedback from service providers regarding observation of changes in housing need in the LSA.	6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being
COMMUNITY ENGAGEMENT PROGRAMS				
Mental Health, Public Safety, Housing, Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, seniors	The following will be monitored and reported on to assist with evaluating the success or deficiency of this program: - Number of engagement meetings; - Actions, status and results of all commitments made to stakeholder and indigenous groups; - Minutes and agenda of meeting provided in the semp report; - Use of complaints hotline and actions completed in response; and - Monitoring data for the Project provided via website.	None required.	6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 9 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
Mental Health, Public Safety, Housing, Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, seniors	To foster positive interactions with local community and stakeholders, TCL has been developing and implementing a Public Consultation Plan designed to achieve the following objectives: - Engage in early, frequent, open, and candid communication to build strong relationships with interested parties, particularly those who may be potentially affected by the Project; - Communicate information in a timely, consistent manner to local community members, regulators, and stakeholders throughout the Project to build awareness of the Project, including potential effects and proposed mitigation measures; - Identify and understand Project issues and concerns, as well as ensuring responsive engagement regarding stakeholder interests; - Create and facilitate opportunities for the community and stakeholders to provide meaningful input and feedback on the Project; - Respond to comments received on the Project and documents related to the EAC Application process using tracking tables and other documentation methods;	To foster positive interactions with local community and stakeholders, Telkwa Mining has been developing and implementing a Public Consultation Plan designed to achieve the following objectives: - Engage in early, frequent, open, and candid communication to build strong relationships with interested parties, particularly those who may be potentially affected by the Project; - Communicate information in a timely, consistent manner to local community members, regulators, social service providers, and stakeholders throughout the Project to build awareness of the Project, including potential effects and proposed mitigation measures; - Identify and understand Project issues and concerns, as well as ensuring responsive engagement regarding stakeholder interests; - Create and facilitate opportunities for the community and stakeholders to provide meaningful input and feedback on the Project; - Respond to comments received on the Project and documents related to the EAC Application process using tracking tables and other documentation methods; - Foster strong, collaborative, and long-term partnerships with regulators, community groups, and other stakeholders;	6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 9 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
Mental Health, Public Safety, Housing, Employment and Income (Cont'd.)		- Foster strong, collaborative, and long-term partnerships with regulators, community groups, and other stakeholders; and - Gather input and feedback on the project from the local community and stakeholders and ensure it is considered during Project planning.	- Gather input and feedback on the project from the local community and stakeholders and ensure it is considered during project planning; and Implement a Grievance Redress Mechanism for workers and community members. Report out annually on the results of the Grievance Redress Mechanism including number and type of grievances received, measures taken to resolve each issue, and their current status. The reports will be publicly available.	6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being
Mental Health, Public Safety, Housing, Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, seniors	The Community Engagement Programs will also involve regular and ongoing engagement with stakeholder groups most likely to be concerned and affected by the Project, including: - Indigenous groups, including the OW, Wet'suwet'en First Nation, and Witset; - Local and regional authorities and representatives such as the Village of Telkwa, the Town of Smithers and the RDBN; - Local community such as Tenas Mine Neighbors and other Bulkley Valley residents; - Local recreation groups including Back Country Horsemen of BC, Bulkley Valley Bowmen, Smithers Snowmobile Association, Upper Skeena Angling Guides Association, and other guide outfitters;	Telkwa Mining will fund the Community Engagement Programs during the Project Construction, Operation and Decommissioning and Reclamation phases (25 years). The community engagement program will be included at a high-level in the role profile for the Mine Manager, Indigenous Superintendent and Environmental Coordinator. Presentations will be held twice a year with various Indigenous Nations and stakeholders to provide a Project update, gather feedback and respond to questions. The same information will be posted on the Project's website and included in the annual report to regulatory agencies. Furthermore, Telkwa Mining will maintain an open-door policy for any groups who wish to engage with the Project.	6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 9 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
Mental Health, Public Safety, Housing, Employment and Income (Cont'd.)	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, seniors	- Local community groups such as Bulkley Valley Community Resource Board, Skeena Watershed Conservation Coalition, Smithers Chamber of Commerce, Smithers Exploration Group, Trout Creek Fish Hatchery; - Other local non-governmental organizations; and - Members of the local and regional workforce potentially interested in work at the Project.	The Community Engagement Programs will also involve regular and ongoing engagement with stakeholder groups most likely to be concerned and affected by the Project, including: - Indigenous groups, including the OW, Wet'suwet'en First Nation, and Witset; - Local and regional authorities and representatives such as the Village of Telkwa, the Town of Smithers and the RDBN; - Local community such as Tenas Mine Neighbours and other Bulkley Valley residents; - Local recreation groups including Back Country Horsemen of BC, Bulkley Valley Bowmen, Smithers Snowmobile Association, Upper Skeena Angling Guides Association, and other guide outfitters; - Local community groups such as Bulkley Valley Community Resource Board, Skeena Watershed Conservation Coalition, Smithers Chamber of Commerce, Smithers Exploration Group, Trout Creek Fish Hatchery; - Other local non-governmental organizations, particularly those who serve identified equity-deserving populations from the GBA Plus report; and - Members of the local and regional workforce potentially interested in work at the Project.	

Table 9 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
Mental Health, Public Safety, Housing, Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, seniors	The Mine Manager is responsible to: - Develop and support a Community Engagement Committee that engages local community stakeholders, representatives of government departments, and TCL staff to discuss environmental management, Minesite development and performance, and community partnerships; and - Oversee the Minesite sponsorship program; and develop policies and procedures for general community communication, Minesite tours, sponsorship support, and participation in community and industry events.	The Mine Manager is responsible to: - Develop and support a Community Engagement Committee that engages local community stakeholders, representatives of government departments, and Telkwa Mining staff to discuss environmental management, Minesite development and performance, and community partnerships; - Oversee the Minesite sponsorship program; and develop policies and procedures for general community communication, Minesite tours, sponsorship support, and participation in community and industry events; and Oversee the Grievance Redress Mechanism for workers and community members. <i>The management plans will be updated during the permitting phase to include relevant cultural training and GBA Plus and gender-based violence training activities.</i>	6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being
Mental Health, Public Safety, Housing, Employment and Income	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities, people with moderate to severe mental health challenges, seniors	The following will be monitored and reported on to assist with evaluating the success or deficiency of [the community engagement] program: - Number of engagement meetings; - Actions, status, and results of all commitments made to stakeholder and indigenous groups; - Minutes and agenda of meeting provided in the semp report; - Use of complaints hotline and actions completed in response; and Monitoring data for the Project provided via website.	None required.	6.1 Demographics 6.3 Infrastructure and Services 6.5 Community Well-being

Table 9 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
EDUCATION, TRAINING, AND EMPLOYMENT PROGRAM				
Mental Health, Income and Employment	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	The following will be monitored and reported on to assist with evaluating the success or deficiency of this program: ▪ Training program for each employee; ▪ Skills matrix for each employee; ▪ Training completed versus planned for the overall workforce; ▪ Number and value of scholarships provided to employees and families to pursue additional educational or skill qualifications; ▪ Providing overlapping positions that require employees to become knowledgeable in a broader sense; ▪ Vacation relief opportunities for employees and students over the age of 18; ▪ Employment ads will be provided at least 6 months ahead of planned positions if possible; ▪ A rating system developed to rank local potential employees higher than non-local employees; and ▪ Pay and benefits for positions based within the RSA will be higher versus the same position if it exists outside of the RSA.	The following will be monitored and reported on to assist with evaluating the success or deficiency of this program: ▪ Training program for each employee; ▪ Skills matrix for each employee; ▪ Training completed versus planned for the overall workforce; ▪ Number and value of scholarships provided to employees and families to pursue additional educational or skill qualifications; ▪ Providing overlapping positions that require employees to become knowledgeable in a broader sense; ▪ Vacation relief opportunities for employees and students over the age of 18; ▪ Employment ads will be provided at least 6 months ahead of planned positions if possible; ▪ A rating system developed to rank local potential employees higher than non-local employees; ▪ Pay and benefits for positions based within the RSA will be higher versus the same position if it exists outside of the RSA; and ▪ Track percentage of equity-deserving groups identified in the GBA Plus report who a.) received training and b.) were employed by The Project.	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being

Table 9 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
Employment and Income	Women, Indigenous populations, visible minorities, low-income		Track numbers interviewed and hired with education and driver license information and provide training and/or time off to obtain GED if desired and valid class 4 or 5 driver's license.	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being
Employment and Income	Indigenous populations		Telkwa Mining is committed to hiring an Indigenous Superintendent.	5.1 Labour Market
DECOMMISSIONING, RECLAMATION, AND POST-CLOSURE PROGRAM				
Mental Health, Income and Employment	Women, Indigenous populations, visible minorities, 2SLGBTQI+, people with disabilities	The following will be monitored and reported on to assist with evaluating the success of this program: - Value of the Legacy Fund and amount of money distributed through the fund; - Number of employees accessing the RRSP and total value; - Number of training programs completed; - Percentage of employees completing transitioning program; and - Percentage of employees with transferrable skills and top skills completed.	The following will be monitored and reported on to assist with evaluating the success of this program: - Value of the Legacy Fund and amount of money distributed through the fund in Post-closure; Value of the intergenerational fund and the amount of money distributed through the fund in Post-closure; - Number of employees accessing the RRSP and total value; - Number of training programs completed; - Percentage of employees completing transitioning program; and - Percentage of employees with transferrable skills and top skills completed.	5.1 Labour Market 6.1 Demographics 6.5 Community Well-being

Table 9 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
Food Security	Indigenous populations	Revegetation Monitoring: The estimated revegetation monitoring program cost is \$1,592,100. A detailed summary of cost, including expected professional fees and associated disbursements (i.e., accommodations, incidentals, and vehicle rentals), is provided in Table 8.4-2 [of the Reclamation and Closure Plan]. The cost summary is based on 28 planned inspections and one (1) event-triggered inspection in Years 25-75, for a total of 29 inspections. Each inspection is expected to take six (6) days, inclusive of travel time, and require two (2) skilled technicians.	Revegetation Monitoring: The estimated revegetation monitoring program cost is \$1,592,100. A detailed summary of cost, including expected professional fees and associated disbursements (i.e., accommodations, incidentals, and vehicle rentals), is provided in Table 8.4-2 [of the Reclamation and Closure Plan]. The cost summary is based on 28 planned inspections and one (1) event-triggered inspection in Years 25-75, for a total of 29 inspections. Each inspection is expected to take six (6) days, inclusive of travel time, and require two (2) skilled technicians. Consult with Indigenous groups annually on the condition and availability of traditional subsistence foods.	6.5 Community Well-being
Food Security	Indigenous populations	Wildlife Monitoring Data downloads will occur during the water or vegetation monitoring site visits described in the preceding subsections. Assumed costs associated with wildlife monitoring are provided in the list below: ▪ Remote cameras: \$1,200; ▪ Data collection during revegetation and/or water monitoring visits (i.e., closure years 1 to 5, 8, 11, and 14); and ▪ Reporting: \$2,400 per year.	Wildlife Monitoring Data downloads will occur during the water or vegetation monitoring site visits described in the preceding subsections. Assumed costs associated with wildlife monitoring are provided in the list below: ▪ Remote cameras: \$1,200; ▪ Data collection during revegetation and/or water monitoring visits (i.e., closure years 1 to 5, 8, 11, and 14); and ▪ Reporting: \$2,400 per year. Consult with Indigenous groups annually on the condition and availability of traditional subsistence foods.	6.5 Community Well-being

Table 9 (Cont'd.)

Theme(s)	Equity-deserving Groups Addressed	Key Management / Monitoring Measures in the Submitted Application	Revised Intersectional Measures	Relevant VC Chapters
Food Security	Indigenous populations	A Subsistence Food Management Plan 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).	A Subsistence Food Management Plan 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).	6.5 Community Well-being

5.0 SUMMARY OF PROJECT EFFECTS ON EQUITY-DESERVING GROUPS – AFTER MITIGATION

The potential effects of the project on equity-deserving groups as identified based on findings from the Tenas Project EAC and the intersectional analysis provided in this report are summarized below. Specific equity-deserving groups most susceptible to differential effects are highlighted by **bold** text.

In all categories, given the extent of mitigations, the small Project workforce, the long life of the mine, and predicted numbers of local hiring, disproportionate impacts to equity-deserving groups are expected to be minimal over the life of the project.

Child Care

According to the Tenas Project EAC submission, a residual effect is anticipated associated with the availability of child care, as the proposed mitigation measures will not fully alleviate the predicted effect during the Operation phase

As described in S6.0-C3-Infrastructure and Services valued component, the influx of a Project workforce will increase the demand for child care within the LSA. This increased demand could potentially limit community members' access to child care, depending on the current and predicted future capacity of these services to accommodate increased demand. Presently, child care services in the LSA are over-subscribed, with many maintaining waitlists. Further, securing suitability-qualified staff for child care is challenging due to inadequate compensation.

Proposed mitigations include funding at least two full-time positions at government-approved child care facilities in the RDBN, including one that is Indigenous organization-operated.

The Tenas Project EAC submission deemed residual effects associated with the availability of child care to be Not Significant. However, to the extent that that this residual effect occurs, **this residual effect may disproportionately impact women.**

Housing

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to housing, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

According to the Tenas EA Project submission, there are residual effects predicted to the Housing and Accommodation subcomponent associated with changes in the cost or availability of housing and accommodation during the Operation phase.

As described in S6.0-C3-Infrastructure and Services valued component, a conservative estimate for the operations phase suggests that approximately 68 workers will in-migrate to the LSA, with roughly 80% bringing families (a rate similar to population movements in previous census data). This migration would result in an additional 197 residents in the LSA, requiring up to 68 residential units. The spin-off

employment, primarily in the retail, transportation, and service sectors, and the wages typically offered in those sectors, are unlikely to be sufficient incentives for migration into the RSA/LSA, given the existing LSA labour pool. Housing and accommodation in the LSA are under existing pressure, with housing shortages and escalating costs reported in the Village of Telkwa, Houston, and Smithers.

Mitigations will include incentivizing further housing development in the LSA.

The Tenas Project EAC submission deemed the residual effects associated with the changes in availability of housing and accommodations to be Not Significant. However, to the extent that these residual effects occur, **women, Indigenous populations, visible minorities, 2SLGBTQI+ people, seniors, people with moderate to severe mental health challenges, and people with disabilities may be disproportionately impacted.**

Employment and Income – Indigenous

According to the Tenas Project EAC submission, a residual effect for the barriers to **Indigenous employment and participation** in Project-related economic benefits is expected because proposed mitigation measures will not be able to fully mitigate the predicted effect. (For more details see S5-C1 Labour Market Valued Component). The Tenas Project EAC submission and Tenas Metallurgical Coal Project EA Transition Order Supplemental Report deemed this residual effect Not Significant.

Mitigation measures will be implemented, including regular communication about available employment opportunities and skill requirements to facilitate capacity building, education, and training support. The role of the Health, Safety, and Human Resources Superintendent will be crucial in maximizing the employment of Indigenous individuals. Telkwa Mining is committed to hiring an Indigenous Superintendent and 15% of Wet'suwet'en First Nation workforce. Furthermore, procurement opportunities to Indigenous-owned businesses that employ at least 5% Indigenous people, and the introduction of Indigenous Cultural Awareness Induction will aim to improve the hiring and retention of Indigenous workers. Collectively, these measures will reduce barriers to Indigenous employment.

Employment and Income – Non-Indigenous

Research indicates that the distribution of benefits and burdens from mining activities can be highly uneven at local, regional, and national levels. Mining towns can become unaffordable for those who do not work in the resource industry or directly benefit from it. The influx of a project workforce may heighten the demand for housing and accommodation, potentially exacerbating current housing shortages and driving up housing costs. The presence of non-resident workers may lead to increased consumption and a rise in demand for local goods and services, leading to increases in cost-of-living expenses such as food and transportation.

Mitigation measures to improve hiring and retention of workers from equity-deserving groups, such as education and training support, and the People in Mining Awareness Induction Program, will help reduce barriers to employment. In turn, to the extent that workers from equity-deserving groups are able to secure project-related employment, they will have a buffer against any potential increase in the cost of living associated with the project or economic factors in general.

However, some equity-deserving groups are less likely to benefit from the project. These groups include **women, seniors, visible minorities, people with low incomes, those with disabilities, and those with moderate to severe mental health conditions.** At the same time, members of these same groups are more likely to have lower incomes, and thus less able to adapt to an increased cost of living that could occur because of the Project (Aalhus, Oke, et al., 2018; J. A. Shandro et al., 2011).

Cost of Living

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to cost of living, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

According to the Tenas Project EAC submission, a residual effect on the change in cost of living is expected, primarily driven by changes in the cost or availability of housing and accommodations in the LSA. This effect is anticipated during the operation phase, as the proposed mitigation measures will not be able to fully alleviate the predicted impact.

The Project's Education, Training, and Employment Program is designed to maximize local resident employment during all project phases. Local and migrant workers earning higher mining wages are also likely to increase consumption of goods and services in the LSA and the RSA, both during the construction and operation phases. However, given the small size of the workforce relative to the existing population, the potential contribution to an increase in the costs of such goods and services is expected to be minimal.

The Tenas Project EAC submission deemed this residual effect on the change in cost of living to be Not Significant. However, to the extent that this residual effect occurs, **it would likely have a disproportionate effect on women, Indigenous populations, seniors, visible minorities, people with low income, those with mental and physical disabilities, those with moderate to severe mental health conditions.**

Food Security – Subsistence Foods

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to the nature and significance of Project effects on Wet'suwet'en food security, traditional harvesting and potential project effect pathways, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

According to the Tenas Project EAC submission, a residual effect on food security is anticipated, as the proposed mitigation measures are not expected to fully alleviate the impact.

The construction and presence of the mine site and associated project infrastructure will lead to the removal of land and resources used for subsistence and recreation. The clearing and preparation of the mine site during the Construction Phase are expected to result in habitat loss and restricted access to some tenured areas (i.e., guide outfitting). These effects will persist throughout all active phases of the project, despite mitigation efforts such as improvements to existing trails and the replacement of the Goathorn Creek bridge.

To mitigate effects, Telkwa Mining is committed to ensuring Indigenous people continue to have access to the Project Area for subsistence purposes and to uphold their rights as guaranteed by Section 35 of the 1982 Canadian *Constitution Act* (although for safety reasons some controls or restrictions may need to be

in place at certain locations or certain times). Telkwa Mining will also allow indigenous peoples to enter the mine site area and conduct hunting and collection of subsistence foods on reclaimed and undisturbed lands within the Project Area.

The Tenas Project EAC submission deemed the residual effect to food security to be Not Significant. However, to the extent that this residual effect occurs, **it will disproportionately impact Indigenous people.**

Mental Health

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to mental health, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

According to the Tenas Project EAC submission, a residual effect on mental health is anticipated, as the proposed mitigation measures will not fully mitigate the predicted impact on the Community Well-being VC.

During the Construction and Operation phases, Telkwa Mining will implement mitigation measures to reduce worker and family stress and anxiety through the Employee and Family Assistance Program, which is part of the Health and Wellness Program. The Health and Wellness Program will implement follow-up measures to monitor Community Well-being throughout the various project phases for employees and selected contractors, and to gather information on the health of the overall community residents from Northern Health.

The Tenas Project EAC submission deemed residual effects to mental health to be Not Significant. However, to the extent that this residual effect occurs, **people employed by the project, women, Indigenous people, visible minorities, seniors, people with disabilities, and people living with moderate to severe mental health challenges** may be disproportionately impacted.

Crime and Public Safety

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-005 is related to domestic and/or gendered violence against Indigenous women, girls, and 2SLGBTQI+ people, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

Considering the trends observed in other resource communities in Northern BC, there is a potential for an increase in gendered and domestic violence during all project phases. While the mitigation measures established through the health and wellness program, community monitoring and engagement, People in Mining Program, and cultural safety training are intended to mitigate this effect, there is a possibility that domestic and/or gendered violence could increase to small degree in the LSA. **If this were to occur, it would disproportionately impact women, and in particular, Indigenous women.**

Food Security – Purchased Foods

Apart from the availability of subsistence foods, food security is influenced by income and cost of living. Decreased food security is a growing challenge for people in the LSA, and an increase in the cost of living could exacerbate food insecurity. Mitigations, such as Telkwa Mining's support for the Witset and Telkwa Elementary School breakfasts, and those for changes to the cost of living are expected to be successful, there could still be minor impacts on food security. Those who may be disproportionately impacted by an increase in the cost of living are the same groups who may also be disproportionately affected by changes to the cost of living: **women, Indigenous people, visible minorities, seniors, people with disabilities, those with moderate to severe mental health challenges, and those who have low incomes.**

5.1 KEY PROJECT BENEFITS SUMMARY

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-006 is related to economic benefits that would be generated by the Project and how these benefits would be distributed both within the population and over time, including information discussed in this section of the *Tenas Environmental Assessment Transition Order: Gender-Based Analysis (GBA) Plus Report*.

Notwithstanding the potential for equity-deserving groups to be affected disproportionately as discussed above, there is also the potential for some equity-deserving group members to experience benefits from the Project. The extent of benefits and the distribution of benefits among different equity-deserving groups will depend on how effectively mitigations are implemented, and how well they are received by the wider RSA and LSA communities. Larger economic, environmental and social contingencies will also affect the extent of benefits; for example, fluctuations in provincial, national, and global economies, changes to federal and provincial socio-economic policies, and climate instability could also affect the realization of Project benefits.

Telkwa Mining remains dedicated to the Tenas social and economic mitigation and management plans and recognizes that community buy-in and involvement are crucial factors to their success. Telkwa Mining is eager to collaborate with local non-profit and government organizations to ensure mitigations are well-honed to local needs and remain as effective as possible as the LSA and RSA communities grow and evolve.

The following benefits are possible for the LSA and RSA communities, with the successful implementation of mitigations:

- **Increased Project participation for women:** Telkwa Mining's support of two child care positions at government-approved RDBN facilities may encourage greater Project participation from women, including Indigenous women (see sections 2.5.1, 3.1, 3.2.1, and 4.1) (Telkwa Coal Ltd., 2022e). Telkwa Mining aims to provide child care to all Project employees who require it through these child care positions (Telkwa Coal Ltd., 2022g). The Child Care Program will be implemented and monitored through the Education, Training, and Employment Program to ensure these benefits are realized (Telkwa Coal Ltd., 2022g).

- **Increased professional skills for the RSA and LSA workforce, with targeted measures for equity-deserving group members:** Telkwa Mining will provide on-the-job skills training and support institutions to provide scholarships and bursaries for STEM-oriented educational opportunities for LSA and RSA community members (see Section 4.1) (Telkwa Coal Ltd., 2022g). Telkwa Mining expects such measures will boost the professional skills of workers, including more women and Indigenous individuals, leading to increased income and job opportunities in the short- and long-term (see Section 2.4.3) (Telkwa Coal Ltd., 2022b). These measures will be implemented and monitored through the Education, Training, and Employment Program to ensure benefits are realized (Telkwa Coal Ltd., 2022g).
- **Improved Project employment and income for equity-deserving group members:** Telkwa Mining anticipates implementing various mitigations to increase Project employment attraction and retention rates for equity-deserving group members (Telkwa Coal Ltd., 2022g). Measures such as collaborating with the Society for Domestic Peace to employ anti-bullying and harassment measures, and implementing the Indigenous Cultural Awareness and People in Mining Awareness Induction programs, aim to foster a supportive Project work environment for equity-deserving groups (see sections 4.1 and 4.2). Therefore, more people from equity-deserving groups in the LSA and RSA are expected to benefit from the increased income and job opportunities accompanying the Project (Telkwa Coal Ltd., 2022). [Telkwa Mining is specifically targeting employment for approximately 15% of Wet'suwet'en First Nation workforce \(Telkwa Mining Ltd., 2025\).](#) These measures will be implemented and monitored through the Education, Training, and Employment Program, and the Health and Wellness Program to support the realization of benefits (Telkwa Coal Ltd., 2022g).
- **Increased business opportunities for Indigenous-owned businesses:** [Telkwa Mining expects to support procurement from smaller businesses with limited capacity, including Indigenous-owned businesses that employ at least 5% Indigenous people to enhance participation in Project benefits \(Telkwa Mining Ltd., 2025\). Additional measures are proposed in Tenas EA Transition Order Supplemental Order to improve procurement include engaging with Indigenous-owned businesses to understand how to enable their successful participation in procurement processes and conducting virtual business information sessions to discuss bidding processes \(Telkwa Mining Ltd., 2025\). These measures will be implemented and monitored through the Procurement Program \(Telkwa Coal Ltd., 2022g\).](#)

Telkwa Mining will collaborate with the diverse communities and organizations in the LSA and RSA, and update policies and strategies to adapt to community observations, challenges, and changing needs over time. The Project Socio-economic Management Plan, Public Consultation Plan, and Tenas Mine Advisory Committee will guide and enable Telkwa Mining to monitor and adapt the implementation of mitigations as needed to support their effectiveness throughout the life of the Project.

6.0 CONCLUSION

The analysis of the potential disproportionate effects on distinct human populations, including populations identified by gender, age, ethnicity, or other factors relied on relevant community economic, social, and cultural indicators and Indigenous interests that were assessed and documented in the original EAC for the Tenas Project.

The combined effect of mitigation measures, the small workforce, the long life of the mine, and the emphasis on local hiring are expected to substantially limit the adverse effects of the project on distinct populations, all of which are predicted to be minimal.

The analysis was grounded in the GBA Plus methodologies as recommended by Women and Gender Canada (WAGE), the Impact Assessment Agency of Canada (IAAC), and the BC EAO. The approach and findings were informed by review of the effects assessment findings from the Tenas Project EAC submission social and economic VC chapters, the Tenas Project EAC submission Transition Order, and central topics identified in key Canadian and International GBA Plus and Environmental Assessment literature. The research was further supported by fieldwork involving a series of interviews with community service providers and representatives from a diverse range of community organizations in the LSA and RSA.

The original Tenas Project EAC submission did not find any significant adverse residual social, economic, or cultural effects from the project. The Transition Order from BC EAO did not require a determination of significance approach be utilized for this report to avoid excessively redundant research and review. Instead, a balance of evidence approach was used to evaluate potential project effects in light of the unique circumstances of various identified distinct populations. Considering: i) the small workforce, ii) the opportunity for a high percentage of jobs to be filled by local hires, iii) a long and stable mine life of 21+ years, and iv) the mitigation and management measures identified previously and expanded upon based on the analysis herein to address specific identified GBA Plus issues, it is unlikely that distinct populations will be adversely affected to any measurable degree. If the expected socio-economic benefits of the project are realized and the relevant social mitigation and management measures are fully implemented, members of distinct populations may in fact experience opportunities and benefits that might not otherwise be available to them.

7.0 REFERENCES

- Aalhus, M., Fumerton, D. R., & Oke, B. (2018). The social determinants of health impacts of resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring. Northern Health Authority. https://www.northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/impacts-promising-practices-assessment-monitoring.pdf
- Aalhus, M., Oke, B., & Fumerton, R. (2018). The social determinants of health impacts on resource extraction and development in rural and northern communities: A summary of impacts and promising practices for assessment and monitoring. Northern Health. https://www.northernhealth.ca/sites/northern_health/files/services/office-health-resource-development/documents/impacts-promising-practices-assessment-monitoring.pdf
- Aird, P. K., Fox, G., & Bain, A. (2019). Recognizing and Including Indigenous Cultural Heritage in British Columbia. First Peoples' Cultural Council.
- American Psychological Association. (n.d.). Equity, diversity, and inclusion. <https://www.apa.org/topics/equity-diversity-inclusion>
- Amnesty International. (2016). Out of Sight, Out of Mind: Gender, Indigenous rights, and energy development in Northeast British Columbia, Canada. Amnesty International. <https://www.amnesty.ca/sites/amnesty/files/Out%20of%20Sight%20Out%20of%20Mind%20EN%20FINAL%20web.pdf>
- Assembly of First Nations. (n.d.). Honouring Earth. Retrieved January 12, 2023, from <https://www.afn.ca/honoring-earth/>
- Association for Mineral Exploration. (2023). BC tracks third highest expenditure in mineral exploration in a decade: Insights from the BC: Insights from the BC Mineral and Coal Exploration Survey 2023. Association for Mineral Exploration. https://amebc.ca/wp-content/uploads/2024/03/EY__Ernst__Young__BC_tracks_third_highest_expenditure_in_minera.pdf
- Baruah, B., & Biskupski-Mujanovic, S. (2023). Indigenous women's employment in natural resource industries in Canada: Patterns, barriers and opportunities. Women's Studies International Forum, 99. <https://doi.org/10.1016/j.wsif.2023.102784>
- Bathurst Resources Limited. (2024). Corporate Governance. Bathurst Resources Limited. <https://bathurst.co.nz/our-company/corporate-governance/>
- Batley, P. (2023, November 29). RCMP - Victim Services [Personal communication].
- BC Coroners Services. (2024). Unregulated Drug Deaths—Summary. Government of British Columbia. <https://app.powerbi.com/view?r=eyJrljoiMmlzN2UyYtItNmM0Yi00MGZhLW11NDU0OTRhZGZGNjYTBhZDJlIiwidCI6IjZmZGI1MjAwLTNkMGQtNGE4YS1iMDM2LWQzNjg1ZTM1OWFkYyJ9>

- BC EAO. (2020). Effects Assessment Policy. https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/guidance-documents/2018-act/effects_assessment_policy_v1_-_april_2020.pdf
- BC Housing. (2022). Report: 2021 Estimate of the Homeless Population in British Columbia. Government of British Columbia. https://www2.gov.bc.ca/assets/gov/housing-and-tenancy/social-housing/supportive-housing/2021_idp_cohort_report_homeless_population_in_bc_final.pdf
- Bowen, E., & Wiebe, C. (2023, October 26). Dze L Kant Friendship Centre [Personal communication].
- Burczycka, M. (2022). Women's experiences of victimization in Canada's remote communities. Statistics Canada. <https://www150.statcan.gc.ca/n1/en/pub/85-002-x/2022001/article/00007-eng.pdf?st=vzss0g2m>
- Canada Mortgage and Housing Corporation. (2019). Identifying core housing need. <https://www.cmhc-schl.gc.ca/professionals/housing-markets-data-and-research/housing-research/core-housing-need/identifying-core-housing-need>
- Canadian Centre for Diversity and Inclusion. (2022). Making the case for diversity, equity, and inclusion. Canadian Centre for Diversity and Inclusion. <https://ccdi.ca/media/3646/toolkit-business-case-en.pdf>
- Canadian Centre for Diversity and Inclusion. (2023). Glossary of IDEA terms: A reference tool for inclusion, diversity, equity, and accessibility terminology. Canadian Centre for Diversity and Inclusion. <https://ccdi.ca/media/4005/20230509-glossary-of-idea-terms-en.pdf>
- Carrier Sekani Family Services. (2023). Highway of Tears. Carrier Sekani Family Services. <https://highwayoftears.org/highway-of-tears/>
- CBC News. (2023, January 28). "It just guts a small community": Forestry job cuts take a personal toll. CBC News. <https://www.cbc.ca/news/canada/british-columbia/chetwynd-canfor-losses-1.6727838#:~:text=It%27s%20been%20a%20tough%20week%20for%20small%20forestry,communit y%2C%20about%20300%20kilometres%20northeast%20of%20Prince%20George.>
- Charman, M., & O'Connor, C. (2023). The Gendered Impacts of Boomtowns: How Financial Dependence, Family, and Victimization Intersect with Hegemonic Masculinity. *International Journal of Rural Criminology*, 7(3), 289–312.
- Corporal Fox, N. (2023, October 23). Houston RCMP [Personal communication].
- Cote, S., & Zacharias, P. (2023, October 25). Northwest Child Development Centre [Personal communication].
- Crenshaw, K. (2016, October). The Urgency of Intersectionality. TED. https://www.ted.com/talks/kimberle_crenshaw_the_urgency_of_intersectionality
- Cullis, T. (2023, October 24). Telkwa and District Senior Society [Personal communication].

- Dze L K'ant Friendship Centre Society. (2022). Urban Indigenous Housing Study: A knowledge Building Project. Dze L K'ant Friendship Centre Society. <http://www.dzelkant.com/news/dze-l-kant-friendship-centre-society-publishes-urban-indigenous-housing-study/>
- Ellis, M., & Williams, J. (2023, October 23). Link to Learning—Houston [Personal communication].
- Elver, D. (2022). 2SLGBTQIA+ Housing Needs and Challenges. Canadian Mortgage and Housing Corporation. <https://www.cmhc-schl.gc.ca/blog/2022/2slgbtqia-housing-needs-challenges>
- Environmental Assessment Act, [SBC 2018], Chapter 51 § 25 (2018). <https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/18051#section25>
- Environmental Assessment Office. (2020). Human and Community Well-Being – Guidelines for Assessing Social, Economic, Cultural and Health Effects in Environmental Assessments in British Columbia. https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/guidance-documents/2018-act/hcwb_guidelines_v1_-_april_2020.pdf
- ERM Consultants Canada LTD. (n.d.). Brucejack Gold Mine Project Nisga'a Economic, Social, and Cultural Impact Assessment Report. Pretium Resources Inc. Retrieved November 12, 2023, from <https://www.ceaa-acee.gc.ca/050/documents/p80034/101082E.pdf%5D>
- First Nations and Indigenous Studies. (2009a). Government Policy. Indigenous Foundations. https://indigenousfoundations.arts.ubc.ca/government_policy/
- First Nations and Indigenous Studies. (2009b). Land & Rights. Indigenous Foundations. https://indigenousfoundations.arts.ubc.ca/land__rights/
- First Nations Governance Centre. (2018). National Report of the First Nations Regional Health Survey Phase 3: Volume One. https://fnigc.ca/wp-content/uploads/2020/09/713c8fd606a8eeb021debc927332938d_FNIGC-RHS-Phase-III-Report1-FINAL-VERSION-Dec.2018.pdf
- First Nations Information Governance Centre. (2018). Understanding Child Care in First Nations Communities. https://fnigc.ca/wp-content/uploads/2020/09/bd344e1dba275b7a507eec2322bce7db_fnigc_research_series_child_care_en_final.pdf
- Gibson, G., Yung, K., Chisholm, L., Quinn, H., Lake Babine Nation, & Nak'azdli Whut'en. (2017). Indigenous Communities and Industrial Camps: Promoting healthy communities in settings of industrial change. The Firelight Group.
- Government of B. (2023). British Columbia First Nations & Indigenous People. WelcomeBC. <https://www.welcomebc.ca/Choose-B-C/Explore-British-Columbia/B-C-First-Nations-Indigenous-People>
- Government of BC. (2023). Gender-based violence, sexual assault, and domestic violence. <https://www2.gov.bc.ca/gov/content/safety/public-safety/domestic-violence>

- Government of British Columbia. (2019). B.C. Economic Accounts & Gross Domestic Product. <https://www2.gov.bc.ca/gov/content/data/statistics/economy/bc-economic-accounts-gdp>
- Hagman, J., & Lavallie, S. (2023, October 24). Thomas Robinson [Personal communication].
- Hasdell, R., Niimi-Burch, S., & Kurrein, M. (2023). Priority Health Indicators for British Columbia: Household Food Insecurity. BC Centre for Disease Control. http://www.bccdc.ca/Documents/2023-10-18_HouseholdFoodInsecurityReport.pdf
- Homelessness Services Association of BC. (2021). Smithers—2021 Homeless Count. Homelessness Services Association of BC. <https://www.bchousing.org/publications/Homeless-Count-Smithers-2021.pdf>
- Homelessness Services Association of BC. (2023). Smithers 2023 Homeless Count. Homelessness Services Association of BC. <https://www.bchousing.org/sites/default/files/media/documents/Homeless-Count-Smithers-2023.pdf>
- Hoogeveen, D., Williams, A., Hussey, A., Western, S., & Gislason, M. (2021). Sex, Mines and pipelines: Examining “Gender-based Analysis Plus” in Canadian impact assessment resource extraction policy. *The Extractive Industries and Society*, 8(3). <https://doi.org/10.1016/j.exis.2021.100921>
- Hyslop, K. (2020). These policies could help single-parent poverty in BC. *The Tyee*. <https://childcarecanada.org/documents/child-care-news/20/02/these-policies-could-help-end-single-parent-poverty-bc>
- Impact Assessment Act, S.C. 2019, c. 28, s. 1 (2019). <https://laws.justice.gc.ca/eng/acts/I-2.75/FullText.html>
- Keltie Craig Consulting, Luna Aixin Consulting, Kapenda, K., Licker, A., Silk, K., & Proulx, R. (2021). *Social Equity & Regional Growth Study* (p. 103).
- Kim, M. (2023, October 24). Smithers Community Services Association [Personal communication].
- Kumar, M. B., & Tjepkema, M. (2019, June 28). Suicide among First Nations people, Métis and Inuit (2011-2016): Findings from the 2011 Canadian Census Health and Environment Cohort (CanCHEC). <https://www150.statcan.gc.ca/n1/pub/99-011-x/99-011-x2019001-eng.htm>
- Kurjata, A. (2023, April 6). Hundreds lose jobs as northern B.C. mill closures come into effect. *CBC News*. <https://www.cbc.ca/news/canada/british-columbia/canfor-job-losses-1.6803157>
- Larsen, J. N., Schweitzer, P., & Petrov, A. (2015). Arctic Social Indicators: ASI II: Implementation. Nordisk Ministerråd.
- Levac, L., Stinson, J., Manning, S., & Stienstra, D. (2021). Expanding evidence and expertise in impact assessment: Informing Canadian public policy with the knowleges of invisible communities. *Impact Assessment and Project Appraisal*, 39(3), 218–228. <https://doi.org/10.1080/14615517.2021.1906152>

- Lin Haag, H., Colatoni, A., Cullen, N., Sokoloff, S., Nneka, M., & Broekstra, S. (2019). Battered and Brain Injured: Assessing Knowledge of Traumatic Brain Injury Among Intimate Partner violence Service Providers. 28(7), 990–996.
- Lower, J. A. (1940). The Construction of the Grand Trunk Pacific Railway in British Columbia. *British Columbia Historical Quarterly*, 4(3), 163–181. University of British Columbia Library.
- Manning, Susan, Nash, P., Levac, L., Stienstra, D., & Stinson, J. (2018). Strengthening Impact Assessments for Indigenous Women. Canadian Research Institute for the Advancement of Women. <https://www.criaw-icref.ca/publications/strengthening-impact-assessments-for-indigenous-women/>
- McCreary, T. (2018). Shared Witsuít'en-Settler Relationships in Smithers 1913-1973 (2018th ed.). Urban Aboriginal Knowledge Network Western Research Centre. <http://uakn.org/wp-content/uploads/2018/04/Shared-Histories-Report-June-2017-compressedtitlepage.pdf>
- McCuaig, J., & Manning, S. (2016). Economic Restructuring 3: Resource Development and Diverse Women's Access to Services in the North. CRIAW. <https://www.criaw-icref.ca/publications/economic-restructuring-3-resource-development-and-diverse-womens-access-to-services-in-the-north/>
- Mikkonen, & Raphael, D. (2010). Social determinants of health: The Canadian facts. York University, School of Health Policy and Management. http://www.thecanadianfacts.org/the_canadian_facts.pdf
- Mills, S., Dowsley, M., & Cox, D. (2018). Gender in research on northern resource development. In *Resources and Sustainable Development in the Arctic* (1st ed., pp. 251–270). Routledge.
- Mining Association of British Columbia. (2022). One Province, One Economy: Benefits of British Columbia's Mining Supply Chain. Mining Association of British Columbia. <https://mining.bc.ca/wp-content/uploads/2024/01/OPOE-Report-2022-Web-Version-2.pdf>
- Mining Industry Human Resources Council. (2023). Integrating EDI: Addressing Systemic Employment Barriers in Canadian Mining. <https://mihr.ca/wp-content/uploads/2023/11/MIHR-23-Integrating-EDI-web-EN-Nov.pdf>
- Morin, M. H. (2011). Niwhts'ide'nī Hibi'it'ēn: The Ways of our Ancestors: Witsuwit'en History and Culture Throughout the Millennia. School District #54.
- Murphy, K., Strand, L., Theron, L., & Ungar, M. (2021). "I just gotta have tough skin" Women's experiences working in the oil and gas industry in Canada. *The Extractive Industries and Society*, 8(2). <https://doi.org/10.1016/j.exis.2021.02.002>
- National Inquiry into Missing and Murdered Indigenous Women and Girls. (2019). Reclaiming Power and Place: The final report of the national inquiry into the missing and murdered indigenous women and girls (No. Volume 1a). National Inquiry into Missing and Murdered Indigenous Women and Girls. https://www.mmiwg-ffada.ca/wp-content/uploads/2019/06/Final_Report_Vol_1a-1.pdf
- Native Women's Association of Canada. (2020a). A Culturally Relevant Gender-Based Analysis (CRGBA) Starter Kit: Introduction, Incorporation and Illustrations of Use. <https://app.nwac.ca/resource/a-culturally-relevant-gender-based-analysis/>

- Native Women's Association of Canada. (2020b, March). Indigenous Women and Impact Assessment Final Report. <https://www.canada.ca/content/dam/iaac-acei/documents/research/nwac-impact-assessment-final-report-en.pdf>
- Natural Resources Canada. (2019). Minerals Sector Employment. <https://natural-resources.canada.ca/science-data/science-research/earth-sciences/earth-sciences-resources/earth-sciences-federal-programs/minerals-sector-employment/16739>
- Niessen, L., & Wilkinson, N. (2023, October 23). Houston Salvation Army [Personal communication].
- Office of the Seniors Advocate, British Columbia. (2022). BC Seniors: Falling Further Behind. Office of the Seniors Advocate, British Columbia. https://www.seniorsadvocatebc.ca/app/uploads/sites/4/2022/10/OSA-BCFFB_FINAL.pdf
- Ostry, A. (2009). The impact of recession on the health of rural citizens in British Columbia, Canada. *Rural and Remote Health*, 9(3), 1–4.
- Public Health Agency of Canada. (2022). Inequalities in Health of Racialized Adults in Canada. Government of Canada. <https://www.canada.ca/content/dam/phac-aspc/documents/services/publications/science-research-data/health-inequalities-inforgraphics/health-inequalities-racialized-adults-en.pdf>
- Raphael, D., Bryant, T., Mikkonen, J., & Raphael, A. (2020). *Social Determinants of Health: The Canadian Facts* (2nd ed.). Ontario Tech University Faculty of Health Science, York University School of Health Policy and Management. https://thecanadianfacts.org/The_Canadian_Facts-2nd_ed.pdf
- Rath, P., Powell, M., Armstrong, R., & Tara. (2024). Smithers Pride Society [Personal communication].
- Richmond, C. A., & Ross, N. A. (2009). The determinants of First Nation and Inuit health: A critical population health approach. *Health & Place*, 15(2). <https://doi.org/10.1016/j.healthplace.2008.07.004>
- Ridgeway, A. (2023, October 23). Houston Community Services Organization [Personal communication].
- Rolfe, J., Miles, B., Lockie, S., & Ivanova, G. (2007). Lessons from the social and economic impacts of the mining boom in the Bowen Basin 2004-2006. *Australasian Journal of Regional Studies*, 13(2), 134–153.
- Russo, C., & Terraneo, M. (2020). Mental Well-being Among Workers: A Cross-national Analysis of Job Insecurity Impact on the Workforce. *Social Indicators Research*, 152(2). <https://doi.org/10.1007/s11205-020-02441-5>
- Schreiber, M., Ahmad, T., Scott, M., Imrie, K., & Razack, S. (2021). The case for a Canadian standard for 2SLGBTQIA+ medical education. *Canadian Medical Association Journal*, 193(16). <https://www.cmaj.ca/content/193/16/E562>
- Seychuk, C., Brit, Susanne, Tina, & Bronwynn. (2023, October 25). Northern Society for Domestic Peace [Personal communication].

- Shandro, J. (2014). Summary Report for the Regional Health Forum on Community Health and Extractive Industry Development. The University of Victoria & The UBC Norma B. Keevil Institute of Mining Engineering.
- Shandro, J. A., Veiga, M. M., Shoveller, J., Scoble, M., & Koehoorn, M. (2011). Perspectives on community health issues and the mining boom–bust cycle. *Resources Policy*, 36(2), 178–186. <https://doi.org/10.1016/j.resourpol.2011.01.004>
- Shandro, J., Sam, A. M., Jokinen, L., Kerr, K., Scoble, M., & Ostry, A. (2014). Ten Steps Ahead: Community Health and Safety in the Nak’al Bun/Stuart Lake Region During the Construction Phase of the Mount Milligan Mine. University of Victoria.
- Solway, T. (2019). Report on the The Health of LGBTQIA2 Communities in Canada. The House Commons Standing Committee on Health. <https://www.ourcommons.ca/Content/Committee/421/HESA/Reports/RP10574595/hesarp28/hesarp28-e.pdf>
- Sparc BC. (2020). Housing Needs Report 2020: Town of Smithers. Sparc BC. https://www.smithers.ca/sites/default/files/2022-03/Housing_Needs_Report_Town_of_Smithers_%282020%29%28Jan_6%2C_2021%29.pdf
- Statistics Canada. (2017a). 2016 Census of Population [Dataset]. <https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/dt-td/Rp-eng.cfm?TABID=2&LANG=E&APATH=3&DETAIL=0&DIM=0&FL=A&FREE=0&GC=0&GK=0&GRP=1&PID=110511&PRID=10&PTYPE=109445&S=0&SHOWALL=0&SUB=0&Temporal=2017&THEME=122&VID=0&VNAMEE=&VNAMEF=>
- Statistics Canada. (2017b). 2016 Census Profiles. <http://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/search-recherche/results-resultats.cfm?Lang=E&TABID=1&G=1&Geo1=&Code1=&Geo2=&Code2=&SearchText=stewart&SearchType=Begins>
- Statistics Canada. (2017c, September 13). Low-income measure, after tax (LIM-AT). <https://www12.statcan.gc.ca/census-recensement/2016/ref/dict/fam021-eng.cf>
- Statistics Canada. (2018a). Lone-parent families: The new face of an old phenomenon. <https://www150.statcan.gc.ca/n1/pub/11-630-x/11-630-x2015002-eng.htm>
- Statistics Canada. (2018b). Telkwa, VL [Census subdivision], British Columbia (table). Aboriginal Population Profile. 2016 Census. Statistics Canada Catalogue no. 98-510-X2016001 [Dataset]. <http://www12.statcan.gc.ca/census-recensement/2016/dp-pd/abpopprof/index.cfm?Lang=E>
- Statistics Canada. (2019). Section 2: Police-reported intimate partner violence in Canada, 2018. <https://www150.statcan.gc.ca/n1/pub/85-002-x/2019001/article/00018/02-eng.htm>
- Statistics Canada. (2021). Dictionary, Census of Population 2021: Gender. <https://www12.statcan.gc.ca/census-recensement/2021/ref/dict/az/Definition-eng.cfm?ID=pop232>

- Statistics Canada. (2022a). Dictionary, Census of Population 2021: Indigenous Identity. <https://www12.statcan.gc.ca/census-recensement/2021/ref/dict/az/Definition-eng.cfm?ID=pop001>
- Statistics Canada. (2022b). Dictionary, Census of Population, 2021: Visible Minority. Statistics Canada. <https://www12.statcan.gc.ca/census-recensement/2021/ref/dict/az/definition-eng.cfm?ID=pop127>
- Statistics Canada. (2022c). Incident-based crime statistics, by detailed violations, Canada, provinces, territories, Census Metropolitan Areas and Canadian Forces Military Police. Statistics Canada. <https://www150.statcan.gc.ca/t1/tbl1/en/cv.action?pid=3510017701>
- Statistics Canada. (2022d). Table 98-10-0432-01 Highest level of education by visible minority and immigrant status: Canada, provinces and territories, census divisions and census subdivisions with a population 5,000 or more [Dataset]. <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=9810043201>
- Statistics Canada. (2023a). British Columbia [Province] (table). Indigenous Population Profile. 2021 Census of Population. Statistics Canada Catalogue no. 98-510-X2021001 [Dataset]. <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/ipp-ppa/index.cfm?Lang=E>
- Statistics Canada. (2023b). Census Profile. 2021 Census of Population. Statistics Canada Catalogue no. 98-316-X2021001 [Dataset]. <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/index.cfm?Lang=E>
- Statistics Canada. (2023c). Health of Canadians: Determinants of Health. Statistics Canada. <https://www150.statcan.gc.ca/n1/pub/82-570-x/2023001/section4-eng.htm>
- Statistics Canada. (2023d). Smithers, T [Census subdivision], British Columbia (table). Indigenous Population Profile. 2021 Census of Population. Statistics Canada Catalogue no. 98-510-X2021001 [Dataset]. <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/ipp-ppa/index.cfm?Lang=E>
- Statistics Canada. (2023e). Table: 35-10-0202-01 Intimate partner and non-intimate partner victims of police-reported violent crime and traffic offences causing bodily harm or death, by age and gender of victim [Dataset]. <https://www150.statcan.gc.ca/t1/tbl1/en/cv.action?pid=3510020201>
- Statistics Canada. (2023f). Table 98-10-0436-01 Labour force status by visible minority, highest level of education and immigrant status: Canada, provinces and territories, census divisions and census subdivisions with a population 5,000 or more [Dataset]. <https://doi.org/10.25318/9810043601-eng>
- Statistics Canada. (2023g). Table 98-10-0624-01 Population groups by shelter-cost-to-income ratio groups and core housing need: Canada, provinces and territories, census divisions and census subdivisions [Dataset]. <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=9810062401>
- Statistics Canada. (2023h). Telkwa, VL [Census subdivision], British Columbia (table). Indigenous Population Profile. 2021 Census of Population. Statistics Canada Catalogue no. 98-510-X2021001. [Dataset]. <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/ipp-ppa/index.cfm?Lang=E>

- Stienstra, D., Manning, S., Levac, L., & Baikie, G. (2017). Generating prosperity, creating crisis: Impacts of resource development on diverse groups in northern communities. *Community Development Journal*, 54(2), 215–232.
- Telkwa Coal Ltd. (2022a). BC EAO EAC Application—Tenas Project, Appendix 5.1-A Socio-economic Baseline Report. British Columbia Environmental Assessment Office. https://www.projects.eao.gov.bc.ca/api/public/document/627c5503558c860022682cfd/download/06.1_Demo_May2022-.pdf
- Telkwa Coal Ltd. (2022b). BC EAO EAC Application—Tenas Project, Section 5.0 Economic Effects Assessment, Chapter 1 Labour Market Valued Component. British Columbia Environmental Assessment Office. https://www.projects.eao.gov.bc.ca/api/public/document/627c1e960df8410022b077b0/download/05.1_LabMark_May2022-.pdf
- Telkwa Coal Ltd. (2022c). BC EAO EAC Application—Tenas Project, Section 6.0 Social Effects Assessment, Chapter 1 Demographics Valued Component. British Columbia Environmental Assessment Office. https://www.projects.eao.gov.bc.ca/api/public/document/627c5503558c860022682cfd/download/06.1_Demo_May2022-.pdf
- Telkwa Coal Ltd. (2022d). BC EAO EAC Application—Tenas Project, Section 6.0 Social Effects Assessment, Chapter 3 Infrastructure and Services Valued Component. British Columbia Environmental Assessment Office. https://www.projects.eao.gov.bc.ca/api/public/document/627c1f340df8410022b077f3/download/06.3_InfraServ_May2022-.pdf
- Telkwa Coal Ltd. (2022e). BC EAO EAC Application—Tenas Project, Section 6.0 Social Effects Assessment, Chapter 5 Community Well-being Valued Component. British Columbia Environmental Assessment Office. https://www.projects.eao.gov.bc.ca/api/public/document/627c1f35c1c29b0022b32e35/download/06.5_ComWell-Being_May2022-.pdf
- Telkwa Coal Ltd. (2022f). BC EAO EAC Application—Tenas Project, Section 11.0 Wet’suwet’en Rights and Interests Assessment. British Columbia Environmental Assessment Office. <https://www.projects.eao.gov.bc.ca/p/5b905af23965330024d5b706/application>
- Telkwa Coal Ltd. (2022g). BC EAO EAC Application—Tenas Project, Section 13.0 Management Plans, Chapter 16 Socio-economic Management Plan. British Columbia Environmental Assessment Office. https://projects.eao.gov.bc.ca/api/public/document/627c22e4c1c29b0022b32fa9/download/13.16_SocioEconMgmtPlan_May2022-.pdf
- Telkwa Mining Ltd. (2025). Tenas Metallurgical Coal Project, Environmental Assessment Transition Order Supplemental Report.
- TERA. (2015). Intergenerational Transmission of Knowledge Report for the Proposed Coastal Gaslink Project. Unpublished report.

- The World Bank. (2021). Higher Education. Understanding Poverty. <https://www.worldbank.org/en/topic/tertiaryeducation>
- Truth and Reconciliation Commission of Canada. (2015). Final report of the Truth and Reconciliation Commission of Canada: Summary: Honouring the Truth, Reconciling for the Future. Truth and Reconciliation Commission of Canada.
- UNPRPD & UN Women. (2021). Intersectionality Resource Guide and Toolkit: An Intersectional Approach to Leave No One Behind. <https://www.unwomen.org/sites/default/files/2022-01/Intersectionality-resource-guide-and-toolkit-en.pdf>
- Women and Gender Equality Canada. (2021). Federal 2SLGBTQI+ Action Plan 2022. Canada.Gov. <https://women-gender-equality.canada.ca/en/free-to-be-me/federal-2slgbtqi-plus-action-plan/federal-2slgbtqi-plus-action-plan-2022.html>
- Women and Gender Equality Canada. (2022a). Annex 1: Summary of engagement findings and available Government of Canada initiatives. <https://women-gender-equality.canada.ca/en/free-to-be-me/federal-2slgbtqi-plus-action-plan/annex-1.html>
- Women And Gender Equality Canada. (2022). Fact Sheet: Intimate Partner Violence. <https://women-gender-equality.canada.ca/en/gender-based-violence-knowledge-centre/intimate-partner-violence.html>
- Women and Gender Equality Canada. (2022b). Gender-based Violence (GBV) against Indigenous Peoples in Canada: A Snapshot. Government of Canada. <https://women-gender-equality.canada.ca/en/gender-based-violence/intergovernmental-collaboration/gbv-indigenous-peoples-snapshot.html>

APPENDICES

Appendix A1

Personal Comments

Interviews – LSA Service Providers

Contact	Organization	Title	Interview Date
Ashley Ridgeway	Houston Community Services Organization	Family Support Coordinator	10.23.2023
Laura Niessen Maj Neil Wilkinson	Houston Salvation Army	Community Ministries Director Major	10.23.2023
Cpl Nathan Fox	Houston RCMP	Corporal	10.23.2023
Marian Ellis Jennifer Williams	Link to Learning – Houston	Manager Education and Training Manager	10.23.2023
Juanita Hagman Sandra Lavallie	Thomas Robinson	Executive Director Administration/HR/IT Director	10.24.2023
Ted Cullis	Telkwa and District Senior Society	President	10.24.2023
Kim Martinsen	Community Futures	General Manager	10.24.2023
Myung Kim	Smithers Community Services Association	Executive Director	10.24.2023
Carol Seychuk Britt	Northern Society for Domestic Peace	Executive Director	10.25.2023
Susanne		Admin Assistant, CAMP and CAMP(us) services	
Tina		Stopping the Violence Counselling + Men's Services	
Bronwyn		Stopping the Violence Outreach Services Coordinator Passage Transition House / Third Stage Housing	
Shannon Cote Patti Zacharias	Northwest Child Development Centre	Program Coordinator of Early Years Regional Office Administrator	10.25.2023
John McDivitt	Telkwa Seniors Housing Society	President	10.25.2023
Cormac Hikisch	Northern Health	Regional Health Services Administrator	10.25.2023
Emma Bowen	Dze L Kant Friendship Centre	Aboriginal Early Childhood Development Coordinator	10.26.2023
Carrie Wiebe		Aboriginal Family Connections Coordinator	
Dana Gorbahn	Gorbahn Professional	Founder, CEO	10.26.2023
Paul Batley	RCMP	Victim Services Manager	11.29.2023
Robert MacDonald	Ministry of Children and Family Development	Director of Operations – Bulkley Valley and Hazelton	12.10.2023
Perry Rath Morgan Powell Ryan Armstrong Tara	Smither's Pride Society	Board and members	02.06.2025

Appendix A2

LSA Organizations Interviewed – Equity-deserving Groups Served

Table A2.1 LSA organizations interviewed – equity-deserving groups served.

Organization Name	RDBN	Houston	Telkwa	Smithers	Witset	Type	Indigenous-specific	Women	Children	Low-income	Educational attainment challenges	Newcomers	Physical disabilities	Mental development cognitive disabilities	Mental health and addiction	Seniors	2SLGBTQI+	Homeless and housing insecure
Northern Society for Domestic Peace	Y	Y	Y	Y	Y	Non-profit	N	Y	Y						Y			Y
Northwest Child Development Centre	Y	Y	Y	Y	Y	Non-profit	N		Y				Y	Y				
Gorbhan Professional Alternative Resources	Y	Y	Y	Y	Y	Private	N							Y				
Dze L Kant Friendship Centre (Houston)	Y	Y				Non-profit	Y	Y	Y	Y	Y				Y	Y	Y	Y
Smithers Community Services Association	Y		Y	Y	Y	Non-profit	N		Y	Y	Y	Y		Y		Y		Y
Houston Community Services Association	Y	Y				Non-profit	N		Y	Y						Y		Y
Salvation Army – Bulkley Valley Ministries (Houston)		Y				Non-profit	N		Y	Y					Y			Y

Table A2.1 (Cont'd.)

Organization Name	RDBN	Houston	Telkwa	Smithers	Witset	Type	Indigenous-specific	Women	Children	Low-income	Educational attainment challenges	Newcomers	Physical disabilities	Mental development cognitive disabilities	Mental health and addiction	Seniors	2SLGBTQI+	Homeless and housing insecure
Ministry of Family and Child Development	Y	Y	Y	Y	Y	Government	N	Y	Y	Y								
Thomas Robinson Consulting	Y	Y	Y	Y	Y	Private	N		Y					Y				
Link to Learning (Houston)	Y	Y				Non-profit	N		Y	Y								
Northern Health Authority	Y	Y	Y	Y	Y	Government	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Community Futures Nadina	Y	Y	Y	Y	Y	Non-profit	N			Y	Y							
Telkwa and District Seniors Society	Y		Y			Non-profit	N			Y						Y		
Telkwa Seniors' Housing Society			Y			Non-profit	N			Y						Y		
Smithers Pride Society	Y	Y	Y	Y	Y	Non-profit	N										Y	
Ministry of Social Development and Poverty Reduction	Y	Y	Y	Y	Y	Government	N	Y	Y	Y		Y				Y		
Houston RCMP	Y	Y				Government	N											

Appendix A3

Interview Questions

Subject: GBA Plus Interview Questions

The following interview questions ask about the status of different equity-deserving groups that your organization serves in your community. When we say equity-deserving groups we mean those who have been historically underrepresented or disadvantaged, for example, women, visible minorities, Indigenous Peoples, seniors, people with disabilities, New Canadians, and people in the LGBTQ2+ community.

In this interview, some questions will be asked about potential future scenarios and potential impacts over different time spans. Please refer to the glossary below for our definitions of different lengths of time.

Glossary

Short term effects – 0 to 5 years

Medium-term effect – 5 to 15 years

Long-term effects – 15-30 years

Multi-generational effects – 30+ years

Baseline

- What services do you offer? How many people do you serve in an average year? Is your organization running, below, at, or over capacity?
- What equity-deserving groups do you serve?
 - Follow-up: which equity-deserving groups most frequently use your services?
 - What are their greatest challenges?
- Do you find that there are health or safety concerns with a particular demographic or equity-deserving groups that you serve?
- What kinds of equity-deserving groups do you see struggling more with employment, either gaining or maintaining it?
 - Can you give some examples of why your clients struggle?
- In the past years (as long as you can speak to) what has caused an increase in people using your services? Which equity-deserving groups have most required your services in these increases, or has it varied?

- Community Cohesion
 - Thinking of the greater community or communities you serve—your Nation, Smithers, Telkwa, Houston, and/or Witset—would you say that these communities are tight-knit? That is, do people tend to know each other, know their neighbors, etc.? Is there a high degree of trust within the community?
 - For example, who do people turn to in a crisis? Their friends and family? Or do they tend to go to community leadership or to the government for help/assistance?
 - Are there tensions here between different parts of the community?
 - For example, this could be related to class, culture, resentment between long-term locals and those who have moved here recently, or friction between locals and those who are here temporarily for work? Friction between different groups defined by religion location (big city versus rural)?
 - Is there a particular issue (or issues) that tend to divide the community?
- Mental Health
 - Thinking of the community or communities you serve; can you comment on challenges with mental health? Are there certain equity-deserving groups that struggle more with mental health than others? Do you see some groups using your services for reasons related to mental health more than others?
- Crime
 - Thinking of the community or communities you serve; can you comment on challenges with crime? Are there certain equity-deserving groups that struggle more with crime than others? Do you see some groups using your services for reasons related to crime more than others?
- Food Security
 - Thinking of the community or communities you serve; can you comment on challenges with food security? Are there certain equity-deserving groups that struggle more with food security than others? Do you see some groups using your services for reasons related to food security more than others?
 - What about food security related to availability or access to country foods such as those gathered through hunting, fishing, and plant-gathering?

Predicted Effects

- Cost of living: Of the groups that you serve, who would be most affected by increases in the cost of living, in particular, decrease in housing availability / increased cost of housing and food security?
 - What do you think the duration of this sort of impact would be for the equity-deserving groups?
- Food Security – Country Foods: Of the groups that you serve, who would be affected by changes in availability or access to country foods such as those gathered through hunting, fishing, and plant-gathering?
 - How would that affect them?
 - What do you think the duration of this sort of impact would be for the most equity-deserving groups?
- Community Cohesion: Thinking back to our previous conversation about current challenges and strengths with community cohesion—do you think these patterns are likely to continue in the short, middle, and long term? Or do you think they could change?
- Mental Health: Thinking back to our discussion of mental health challenges in the communities you serve—do you think these trends are likely to continue in the short, middle, and long term? Or do you think they could change?
- Crime: Thinking back to our discussion of crime challenges in the communities you serve—do you think these trends are likely to continue in the short, middle, and long term? Or do you think they could change?
- Future Generations: Given what you know about the proposed project, can you think of any potential impacts, positive or negative, that could extend to the next generation (i.e., beyond 30 years)?

General

- Can you share statistics or plans/ reports that would provide us with information on the services you offer and community that you serve?
- Is there anything else you can share about specific equity-deserving groups that may, for direct or indirect reasons, be more sensitive to fluctuations in the local economy, or impacts to cost of living including costs of food and shelter?
- Are there any effects for the proposed Project that may affect equity-deserving groups more than others in terms of potential adverse effects? For a longer period? Mitigations to reduce effects both short and long term?
- Are there any effects for the proposed Project that may affect equity-deserving groups more than others in terms of limiting beneficial effects? For a longer period? Mitigations to improve benefit distribution both short and long term?

Enclosure 2

REVISED TENAS PROJECT ENVIRONMENTAL ASSESSMENT TRANSITION ORDER: CURRENT AND FUTURE GENERATIONS ANALYSIS REPORT, HATFIELD



TENAS PROJECT ENVIRONMENTAL ASSESSMENT TRANSITION ORDER: CURRENT AND FUTURE GENERATIONS ANALYSIS REPORT

Prepared for:

TELKWA MINING LIMITED

1415 HANKIN AVENUE
SUITE D
TELKWA, BC
CANADA, V0J 2X0

Prepared by:

HATFIELD CONSULTANTS LLP

#200 - 850 HARBOURSIDE DRIVE
NORTH VANCOUVER, BC
CANADA V7P 0A3

TEL: 1.604.926.3261 • WWW.HATFIELDGROUP.COM

 *Canadian and owner-operated*

UPDATED JULY 2025

TCC12025
VERSION 9.0

TABLE OF CONTENTS

LIST OF TABLES	ii
LIST OF FIGURES.....	ii
LIST OF APPENDICES	ii
LIST OF ACRONYMS.....	iii
DISTRIBUTION LIST	iv
AMENDMENT RECORD	iv
1.0 SUMMARY OF POTENTIAL EFFECTS TO CURRENT AND FUTURE GENERATIONS.....	1
2.0 METHODOLOGY FOR CURRENT AND FUTURE GENERATIONS ANALYSIS.....	3
2.1 SELECTION OF RESIDUAL EFFECTS	5
3.0 INPUT FROM ENGAGEMENT	6
3.1 INDIGENOUS NATIONS	7
3.2 PUBLIC AND STAKEHOLDERS	7
4.0 RESIDUAL EFFECTS AND MITIGATION MEASURES.....	9
4.1 MITIGATION AND MANAGEMENT PLANS	13
4.2 CUMULATIVE EFFECTS	15
5.0 CONSIDERATION OF BC SUSTAINABLE DEVELOPMENT	16
6.0 PROJECT ALIGNMENT WITH REGIONAL AND PROVINCIAL GROWTH STRATEGIES	19
6.1 PROVINCIAL GROWTH STRATEGIES	19
6.2 REGIONAL GROWTH STRATEGIES	23
7.0 PROJECT BENEFITS TO CURRENT AND FUTURE GENERATIONS	24
8.0 CONCLUSION	26
9.0 REFERENCES.....	27

LIST OF TABLES

Table 1	Questions proposed to Tenas Project EAC submission authors of the original VC Chapters.....	4
Table 2	Key issues identified by the public and stakeholders related to CFG.....	7
Table 3	Residual effects categorized by significance, duration, and reversibility for focused/temporal CFG analysis.....	10
Table 4	Project mitigation measures and management plans.....	14
Table 5	Provincial strategies and plans.	20
Table 6	Regional growth strategies and plans.....	23
Table 7	Hiring and economic benefits through employment.....	24

LIST OF FIGURES

Figure 1	Methodology and sequence used for CFG analysis.	3

LIST OF APPENDICES

Appendix A1	Personal Communications
Appendix A2	Residual Effects Matrix

LIST OF ACRONYMS

ARD	Acid Rock Drainage
BC	British Columbia
BC EAO	British Columbia Environmental Assessment Office
BCHBCNC	Back Country Horsemen of BC North Cariboo
BMP	Best Management Practices
CEA	Cumulative Effects Assessment
CDN	Canadian dollar
CFG	Current and Future Generations
COPC	Contaminants of Potential Concern
CPP	Coal Processing Plant
CR	Concentration ratio
CUS	Cultural Use Study
EA	Environmental Assessment
EAC	Environmental Assessment Certificate
EMS	Environmental Management System
ESC	Erosion and Sediment Control Measures
FSR	Forest Service Road
FTE	Full-Time Equivalent
GHG	Greenhouse Gas Emissions
HADD	Harmful alteration, disruption, or destruction
HQs	Hazard quotients
IC	Intermediate Component
ICEP	Indigenous Consultation and Engagement Plan
ICSP	Integrated Community Sustainable Planning
ILCR	Incremental lifetime cancer risk
LSA	Local Study Area
2SLGBTQI+	Two-spirited, Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and anyone else who identifies as gender and/or sexual orientation diverse.
MAD	Mean Annual Discharge
MWMP	Minesite Water Management Plan
No.	Number
OW	Office of the Wet'suwet'en
PAA	Project Assessment Agreement
PAMP	Public Access Management Plan
PCP	Public Consultation Plan
RDBN	Regional District of Buckley Nechako
RIA	Rights Impact Assessment
RSA	Regional Study Area
TCRC	Telkwa Coalmine Recreation Camp
VC	Valued Component
WWS	Wet'suwet'en Wellbeing Study

DISTRIBUTION LIST

The following individuals/firms have received this document:

Name	Firm	Email
Dan Farmer	Telkwa Mining Ltd	✓
Jessy Chaplin	Telkwa Mining Ltd.	✓

AMENDMENT RECORD

This report has been issued and amended as follows:

Issue	Description	Date	Approved by	
1	First version of Tenas Project Current and Future Generations Report Draft	20240306	Robin Sydneysmith Project Director	Jeff Rempel Project Manager
2	Second version of Tenas Project Current and Future Generations Report Draft	20240422	Robin Sydneysmith Project Director	Lyle Thompson Project Manager
3	Third version of Tenas Project Current and Future Generations Report Draft	20241009	Robin Sydneysmith Project Director	Lyle Thompson Project Manager
4	Forth version of Tenas Project Current and Future Generations Report Draft	20250424	Robin Sydneysmith Project Director	Lyle Thompson Project Manager
5	Fifth version of Tenas Project Current and Future Generations Report	20250505	Lyle Thompson Project Manager	Adinda Herdianti Social Science Specialist
6	Sixth version of Tenas Project Current and Future Generations Report	20250616	Robin Sydneysmith Project Director	Adinda Herdianti Social Science Specialist
7	Seventh version of Tenas Project Current and Future Generations Report	20250624	Robin Sydneysmith Project Director	Adinda Herdianti Social Science Specialist
8	Eight version of Tenas Project Current and Future Generations Report	20250714	Robin Sydneysmith Project Director	Adinda Herdianti Social Science Specialist
9	Ninth version of Tenas Project Current and Future Generations Report	20250722	 Robin Sydneysmith Project Director	 Adinda Herdianti Social Science Specialist

Current and Future Generations (CFG) requirements for the Tenas Project Application

Transition Order Requirement	Section
a) The Project's positive or negative effects on environmental, economic, social, cultural and health valued components (VCs) and Indigenous interests, as those effects impact both current and future generations.	Section 1.0 Summary of Potential Effects to current and Future Generations Section 4.0 Residual Effects and Mitigation Measures
b) A description of how input from the public and Indigenous Nations related to effects on current and future generations was incorporated into the Application and how the Proponent's plans for the Project has changed as a result.	Section 3.0 Input from Engagement
c) Measures that would more equitably distribute positive and negative effects of the Project over time (e.g., across generations).	Section 4.0 Residual Effects and Mitigation Measures
d) A description of how residual effects to VCs and Indigenous interests will affect both current and future generations.	Section 4.0 Residual Effects and Mitigation Measures
e) The type(s) of economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.	Section 4.0 Residual Effects and Mitigation Measures

1.0 SUMMARY OF POTENTIAL EFFECTS TO CURRENT AND FUTURE GENERATIONS

All Telkwa Mining Limited (Telkwa Mining)'s Transition Order Information Requests (IR) responses were available to the Office of the Wet'suwet'en (OW) for their review and comment as of November 13, 2024. OW provided comments on the initial version of this report between February 28 and March 12, 2025. Telkwa Mining has responded to all specific and relevant OW comments in the tracking table issued June 2025 entitled *TML BC EAO OW IR for the Tenas Coal Project*.

OW also indicated that they may provide additional information for EAO's consideration that is relevant to this report from forthcoming OW reports including a Wet'suwet'en Wellbeing Study (WWS), a Rights Impact Assessment (RIA), and a Cultural Use Study (CUS). Annotations are provided herein indicating where any new information will be incorporated. The IR in question and relevant sections of the current report are:

- OW-007 (Sections 3.1, 4.0 and 7.0).

Telkwa Mining looks forward to the opportunity to speak with House members and OW to better understand concerns regarding Project effects on Wet'suwet'en culture and land use, ability to pass on knowledge to future generations and safeguard culture, analysis and mitigation measures to address impacts to current and future generations and economic benefits from the Project.

The Tenas Project Environmental Assessment Certificate submission (EA) was originally submitted under the British Columbia's 2002 *Environmental Assessment Act*. To bring the EA in line with present-day regulations and the 2018 *Environmental Assessment Act* (the *Act*), the BC Environmental Assessment Office (BC EAO) issued a Transition Order to Telkwa Coal Ltd. (also known as Telkwa Mining Ltd.) on December 16, 2022. As stated in the Tenas Transition Order, schedule A, part C, Section 4, Telkwa Mining Ltd. must adopt the new regulatory requirements as defined in Section 25 (2)(f) of the *Act*. The *Act* requires that every reviewable project assessment must consider other assessment matters, including effects on current and future generations.

The purpose of this report is to analyze the potential positive and negative direct and indirect effects of the Tenas Project (the Project) on current and future generations. The analysis is based on the effects assessment previously completed and submitted for the Project. As required by the Project Transition Order, an overview of inputs from engagement, and a discussion around considerations of sustainable development in BC's is included. The report includes an analysis focused on residual effects for specific Valued Components (VC) and an evaluation of how the Project aligns with provincial and regional development strategies.

According to the BC EAO Effects Policy (Government of BC 2020a), key considerations for the assessment of effects on CFG include:

- How are existing conditions being protected, maintained, enhanced, and/or degraded because of the Project?

- How are the positive and negative Project effects distributed temporally (i.e., across generations)? And are there differences in distribution within the population (for example will some groups or segments of the population benefit while others are adversely affected)?
- What type(s) of economic growth does the Project create and how is this growth distributed? and
- How is the Project aligned with relevant regional or provincial strategies for economic development and sustainability?

Potential Project effects were assessed in the Tenas EAC submission. This CFG report has analyzed these effects assessments through a CFG lens. Underlying assumptions are the same as were used in the Tenas EAC submission's assessments. For the purposes of the CFG analysis priority is given to adverse residual effects that were found to be either Significant, Irreversible, or to have a duration of effect classified as long-term or permanent as these would be expected to be most relevant to future generations. Residual adverse effects identified in the Tenas Project EAC submission as short- or medium-term in duration are assumed to affect the current generation.

According to the original Tenas Coal EA, most Project effects identified as short and medium-term in duration can be mitigated, thereby eliminating residual effects, and are therefore not considered for current generations. This analysis focuses on residual adverse effects that are likely to persist to future generations based on temporal considerations. Long-term Project effects start as short and medium-term effects. Uncertainty associated with global phenomenon like climate change are outside the scope of the current analysis.

In the Tenas Project EAC submission there was only one residual adverse effect, associated with the Visual Quality VC that was predicted to be Significant. Reduction in visual quality during active phases at the Minesite had a Significant residual adverse effect in the medium-term which was deemed partially reversible while it was rated as non-Significant at the end of post-closure phase with reclamation activities being completed. The other residual effects highlighted by this CFG focused analysis include: Long-term or Permanent duration and Irreversible adverse effects. These were predicted for the Surface Water, Groundwater and Fish and Fish Habitat VCs. The methodology used to focus this CFG analysis is described in Section 2.0.

Input from the public and stakeholders factored into this analysis of effects on CFG is discussed in Section 3.0. A discussion of residual effects from the Project and associated mitigations in the context of CFG is included in Section 4.0. Additional details on baseline conditions and criteria for assessment of effects are included in the original Tenas Coal Project EA VC chapters, and not repeated in this analysis.

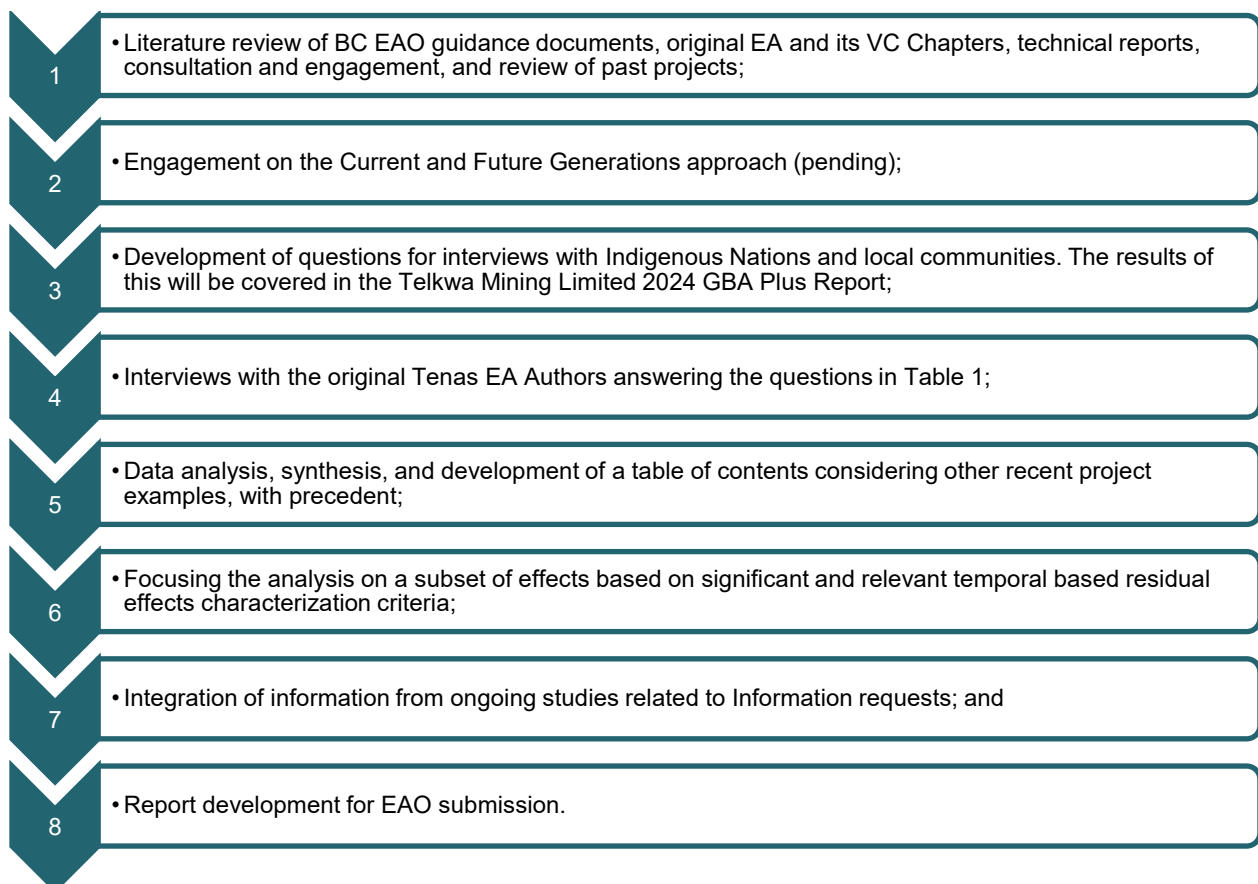
Consideration of sustainable development plans in BC is included in Section 5.0. Telkwa Mining confirms that the Project aligns with various plans and strategies of the Government of BC that promote sustainable growth and development. The Project also aligns with relevant regional and provincial growth strategies (see Section 6.0).

2.0 METHODOLOGY FOR CURRENT AND FUTURE GENERATIONS ANALYSIS

The Tenas Project EAC submission was developed and submitted under the 2002 *BC Environmental Assessment Act* which did not include a requirement for CFG analysis. This report on CFG has been designed to meet the requirements of the EA Transition Order issued on December 16, 2023, to bring the Project into compliance with the *Act*.

The BC EAO's effects assessment policy (Government of BC 2020a) provides guidance for CFG analysis. Figure 1 below presents the Tenas Coal EA Project methodology and sequence for analyzing effects on CFG.

Figure 1 Methodology and sequence used for CFG analysis.



CFG analysis is a new provincial requirement introduced with the 2018 *Act*. The only precedents available are two recent EAs completed in the province that have approved CFG reports and one pending approval. For these reports CFG was included in scoping and planning of the EA from inception. Currently, there are no finalized CFG reports stemming from a Transition Order under the *Act*.

Step two of the process outlined in Figure 1 includes plans to engage with regulators and First Nations in 2024. However, OW did not grant Telkwa Mining's consultants the opportunity to interview House Groups during 2024 or in the first quarter (Q1) of 2025. Firelight Group, acting as consultants to OW, provided review comments on the draft of this report on March 12, 2025, followed by additional feedback on May 16,

2025. Telkwa Mining's consultants have reviewed these documents and incorporated relevant information into the current version of the report, which will be submitted as Telkwa Mining's response to the EAO.

To address steps three and four in Figure 1, questions were developed by reviewing the information gaps identified in the Tenas Project EAC submission and in consideration of the requirements for this CFG report outlined in the BC EAO's effects assessment policy and Transition Order. The Tenas Project EAC submission authors of each VC chapter were presented with a series of questions listed in Table 1 to provide a framework for semi-structured interviews to discuss and reflect upon the Tenas Project EAC submission's conclusions. Information obtained during interviews was reviewed to inform the analysis of potential effects to current and future generations for relevant biophysical and human VCs. Interview notes were captured in tracking tables and provided back to the Tenas Project EAC submission authors for verification. The assessment of VC-specific effects on current and future generations is presented in Section 4.0 of this CFG report.

Table 1 **Questions proposed to Tenas Project EAC submission authors of the original VC Chapters.**

Questions	Authors Interviewed for the following VCs
Consider the distribution of project benefits and effects across generations. How are existing conditions being protected, maintained, enhanced, and/or degraded because of the project? - How will predicted residual effects to VCs (and Indigenous interests, as relevant/available) affect current and future generations? Alignment with government policy or planning priorities: - Are you aware of any new (since the EA was written) government policy or planning priorities related to your VC(s) that we should include? Consider the temporal distribution of effects, considering mitigation of adverse effects or enhancement of positive effects: - We would like to discuss proposed mitigations, and time scales considered to see if there are any noteworthy analysis considerations of a longer time scale (thirty or more years post-mine closure). - How are the positive and negative project effects distributed temporally (i.e., across generations)? Consider Indigenous Knowledge and Interests: - We are planning meetings with local Indigenous Nations but welcome any feedback or recommendations from your work on the EA, for your VC and interdisciplinary considerations, related to Indigenous Knowledge integration in the analysis, or the analysis of nation-specific Indigenous interests.	Biophysical Atmospheric Environmental Terrain and Soils Surface Water Groundwater Aquatic Resources Fish and Fish Habitat Vegetation Wildlife Avian Species Human Infrastructure and Services Demographic Community Well Being Land and Resource Use Visual Quality Labour Market Economic Development Heritage Resources Human Health

2.1 SELECTION OF RESIDUAL EFFECTS

The CFG analysis focuses on the subset of residual effects—those effects predicted to remain after mitigation measures have been implemented—that were identified in the Tenas Project EAC submission. For the purposes of this analysis specific residual effects were screened in (or out) of the assessment based on being a) rated as Significant, b) identified as Long-term or permanent in duration or, c) considered an Irreversible or Permanent change. These characteristics or criteria are defined by BCEAO as follows:

- **Significance:** The determination of Significance involves a comparison of the current state of a VC in a scenario where it is assumed the Project does not proceed, relative to the predicted state of the VC should the Project proceed. Significance is determined using the residual effects characteristics; magnitude, geographical extent, duration, frequency, reversibility, and context;
- **Duration:** Refers to the length of time over which the residual effect is expected to persist. Note that the definitions of these terms vary depending on the temporal characteristics of the VC. The duration of an effect may be Short-term, Medium-term, Long-term, or Permanent; and
- **Reversibility:** Refers to the extent to which a residual effect can be reversed once the activity causing the residual effect ceases. Effects can be Fully Reversible, Partially Reversible, or Irreversible.

Duration and reversibility were selected due to their temporal emphasis. This allows the CFG analysis to focus on effects with the greatest potential to persist and be relevant to future generations. Project effects, both in the short and medium term, are addressed for the present generation through mitigation measures outlined in the original Tenas Coal EA. Consequently, this analysis concentrates on the effects experienced by the current generation that will continue to impact future generations. It is noted that long-term effects encompass both short and medium-term effects.

Additional residual effects characteristics including magnitude, geographical extent, frequency, and context were not used as screening criteria for this CFG analysis. These characteristics are however included in the determination of Significance in the Tenas Project EAC submission.

To analyze effects on current and future generations, a matrix (Appendix A2) was developed to compare all VCs based on significance conclusions and the focused/temporal-based residual effects characterization criteria, namely duration, and reversibility. However, Heritage Resources is the one VC that did not have a residual effects table, as no residual adverse effects were predicted in the Tenas Project EAC submission or carried forward to the CFG analysis.

3.0 INPUT FROM ENGAGEMENT

As mandated in the Section 11 Order, a procedural directive issued by the BC EAO in accordance with the BC Public Consultation Policy Regulation, BC Regulation 373/2002 (Government of BC 2002), public consultation for the Project is ongoing. This ensures that the public can contribute meaningfully by having many opportunities to gain knowledge about, and contribute to the Project, as part of the EAC Application. CFG was not included in the scope of the original Tenas Project EAC submission. Nevertheless, the results of engagement from the Tenas Project EAC submission were reviewed and considered in the analysis of effects on CFG.

Telkwa Mining has engaged, and continues to engage, with Indigenous Nations, community members and parties interested, or potentially impacted by, the Project since February 2017. Engagement activities have included government official meetings, local recreation and community group meetings, local business and education meetings, and open houses (Telkwa Coal Ltd. 2022k). The evidence submitted during these engagement activities informed this CFG analysis, as the data is incorporated into the original assessment.

In addition, Telkwa Mining has maintained continuous engagement with local Indigenous communities. The information gathered from these interactions is primarily sourced from the Wet'suwet'en rights and interests' chapter (Section 11.0 Tenas Project EAC submission) and is based on existing publicly available desk-based references. [The draft version of this report was available to OW for their review and comment as of November 13, 2024. Firelight Group provided comments on March 12, 2025, followed by additional feedback on May 16, 2025. Telkwa Mining's consultants have reviewed and incorporated relevant information into the current version of the report, which will be submitted as Telkwa Mining's response to the EAO.](#)

The engagement process with Wet'suwet'en has adhered to the guidelines set forth in the Communication and Engagement Agreement, signed in April 2017, and the Tenas Project Assessment Agreement (PAA), which was signed between Telkwa Mining and the Office of the Wet'suwet'en (OW) in August 2021. Tenas Project EAC submission's Subsection 9: Consultation and Engagement describes how Telkwa Mining developed, and is implementing, the Project's Indigenous Consultation and Engagement Plan (ICEP), and how Indigenous engagement informed the assessments (Telkwa Coal Ltd. 2022k).

A Tenas Project Public Consultation Report was created based on the activities conducted as part of the Public Consultation Plan (PCP). A summary of key issues and concerns was discussed, referring to the appropriate section of the EAC Application. Key issues raised during public consultation included the potential effects of the Project on water, air quality, fish, atmospheric environment, wildlife, and access to the Project Area. Telkwa Mining has, and continues to use, the information gathered during Project engagement with Indigenous Nations, the local community, and stakeholders to inform the Project planning phase. Current generations have the option to provide input and feedback on the Project throughout the assessment process. This feedback is incorporated into project planning as practical and appropriate with the aim to reduce potential adverse effects and enhance potential positive effects on future generations.

3.1 INDIGENOUS NATIONS

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-007 is related to the integration of Wet'suwet'en perspectives and concerns into the analysis of impacts to current and future generations, including information including information discussed in this section of the *Tenas Project Environmental Assessment Transition Order: Current and Future Generations Analysis Report*.

Considerations for known Indigenous interests related to the Project, based on publicly available references and Project planning, include:

- Wet'suwet'en System of Governance, Anuk Nu'at'en, and Aboriginal Right of Title;
- Current Land Use and Resource Harvesting;
- Cultural Heritage (Intangible Cultural and Physical Cultural Heritage subcomponents);
- Community Well-being; and
- Wet'suwet'en Health.

Potential effects of the Project on Wet'suwet'en Rights and Interests are identified and considered in the Tenas Project EAC submission (Telkwa Coal Ltd. 2022m).

3.2 PUBLIC AND STAKEHOLDERS

Table 2 lists the key issues identified by stakeholders and members of the public that relate to potential adverse effects on both current and future generations. The entirety of this information has not been reproduced in this report to keep the analysis focused and fit for purpose in line with CFG requirements in the transition order. Relevant sections of the EAC Application are listed for additional information.

Table 2 Key issues identified by the public and stakeholders related to CFG.

Key Issues	Relevant Sections of the EAC App
Water: ▪ Changes to water quality and quantity; ▪ Effects to other VCs because of changes to water (i.e., human health, wildlife, fish and fish habitat, recreation); and ▪ Request to re-categorize Surface Water and Groundwater from Intermediate Component to VC, which was completed during the submission of the EAC application.	Surface Water VC (S4.0-C3) and Groundwater VC (S4.0-C4)
Fish and Fish Habitat: ▪ Changes to fish and fish habitat, including a potential decrease in populations; and Effects on other VCs because of changes to fish (i.e., human health, wildlife, recreation, socio-economics, etc.).	Surface Water VC (S4.0-C3) and Fish and Fish Habitat VC (S4.0-C5)

Table 2 (Cont'd.)

Key Issues	Relevant Sections of the EAC App
Climate Change: - Changes to climate change, including a potential increase in: - Greenhouse gases; - Unpredictable weather events; - Drought; and Negative, long-term, global environmental effects.	Atmospheric Environment VC (S4.0-C1)
Dust: - Changes in air quality, leading to potential increase in: - Effects on other IC/VCs because of the changed to water (i.e., human health, wildlife, vegetation, fish, and fish habitat, etc.).	Atmospheric Environment VC (S4.0-C1)
Wildlife: - Changes to wildlife, leading to a potential decrease in: - Health and populations; - Habitat quality and quantity; and - Effects on other IC/VCs because of changes to wildlife (i.e., human health, vegetation, fish and fish habitat, recreation, etc.).	Wildlife VC (S4.0-C8)
Caribou: - Changes in caribou, leading to potential: - Decrease in health and populations; - Decrease in habitat quality and quantity; and - Cumulative effects on wildlife due to industry.	Wildlife VC (S4.0-C8)
Potential Acid Rock Drainage: - Changes to water quality, leading to potential: - Metal leaching creates elevated parameter concentrations; - Acid rock drainage creating reduced pH; and - Effects on other IC/VCs because of changes to water quality due to acid rock drainage (i.e., human health, fish and fish habitat, vegetation, wildlife, etc.).	Surface Water VC Mine site Water Management Plan (MWMP) (S13.0-C11)
Access to Recreation: - Changes to land use, leading to potential: - Reduced outdoor recreation opportunities within the Project Area; and - Limited access to recreation sites beyond the Project Area.	Land Use and Resource Use VC (S6.0 C4) & Public Access Management Plan (PAMP)

(Telkwa Coal Ltd. 2022k)

4.0 RESIDUAL EFFECTS AND MITIGATION MEASURES

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-007 is related to the adequate and appropriate mitigation measures and responses to addressing impacts to current and future Wet'suwet'en generations, including information including information discussed in this section of the *Tenas Project Environmental Assessment Transition Order: Current and Future Generations Analysis Report*.

This section describes residual effects, associated mitigation measures, and cumulative effects as they relate to CFG. Table 3 presents the findings of a residual effects matrix (Appendix A2) developed for the CFG analysis, highlighting residual adverse effects categorized by significance, duration, and reversibility, with a focus on both Irreversible, and Long-term residual adverse effects. The predicted residual effects are expected to impact current generations in the near- and mid-term, and future generations in the long-term. A full list of residual adverse effects by each VC is included in Table 5.5-1 in the individual VC chapters of the Tenas Project EAC submission.

Based on the focused CFG analysis, forty-four residual effects are predicted to have Long-term effects and nine are Irreversible. Table 3 shows the potential residual adverse effects broken down by VC that are Significant or will remain Long-term or are Irreversible or Partially Reversible.

Residual effects, with a temporal focus for this CFG analysis, are described in more detail below:

Surface Water

Despite mitigation measures discussed in Section 4.1, there are four Long-term, Irreversible changes predicted for water quantity and quality including:

- Changes in mean annual discharge for Four, Tenas, and Goathorn Creeks;
- Change in season flow distribution for Four, Tenas, and Goathorn Creeks;
- Changes in low and high flows for Four, Tenas, and Goathorn Creeks; and
- Changes in other measurable water quality parameters above guidelines for Four, and Tenas Creeks.

The effects are anticipated to be Long-term and Irreversible for flows but reversible for water quality over a duration of 100 years, however, they are predicted to be Not Significant. These residual effects may affect water availability for fish and fish habitat, vegetation and ecosystems, and wildlife populations for current and future generations in the LSA. Project water quality effects are predicted to stabilize by the year 2100, although climate change scenarios could introduce variability that is beyond the scope of this analysis. The LSA for the VC Surface Water is described in the Tenas Project EAC submission, under Section 4.0, Chapter 3, Section 3.2.4.1. In addition, a summary of Potential Project related Effects are outlined in VC Chapter 5.2.3 (Telkwa Coal Ltd. 2022e).

The Project water management systems include monitoring programs to allow for adaptive management if necessary. If water availability decreases, acid rock drainage-related effects could increase, altering future water quality negatively. In consideration of future generations, attention should be given to dam and spillway lifecycles to verify that plans look far enough into the future to accommodate changing conditions (Samantha Barnes, Pers. Comm., October 17, 2023).

Table 3 Residual effects categorized by significance, duration, and reversibility for focused/temporal CFG analysis.

Valued Component	Residual Adverse Effects	Subcomponent	Comments	Significance	Duration	Reversibility
Surface Water	Change in Mean Annual Discharge (MAD).	Surface Water Quantity	Based on EAC measurable changes will occur in Tenas, Goathorn and Four Creeks.	Not Significant	Long-term is defined as effects that extend beyond the post-closure period, >25 years.	Irreversible
Surface Water	Change in Seasonal Flow Distribution.		Based on EAC measurable changes will occur in Tenas, Goathorn and Four Creeks.			
Surface Water	Change in Low and High Flows.		Based on EAC measurable changes will occur in Tenas, Goathorn and Four Creeks.			
Surface Water	Change in other measurable water quality parameters.	Surface Water Quality	Based on EAC measurable changes will occur in Tenas, and Four Creeks.	Not Significant	Long-term is defined as effects that extend beyond the post-closure period, >25 years.	Irreversible
Groundwater	Changes to Groundwater Level in the Area of the Private Wells.	-	Based on the EAC application no measurable consistent changes in water levels in the private wells is expected.	Not Significant	Long-term is 25 years past the initiation of post-closure phase.	Irreversible
Groundwater	Change in Groundwater Discharge Rates to Creeks and Rivers.	-	Primarily Tenas, and Four Creeks	Not Significant	Long-term is 25 years past the initiation of post-closure phase.	Irreversible
Groundwater	Changes to Groundwater Quality at Private Wells.		Based on the EAC application no measurable consistent changes in water quality in the private wells is expected.			
Groundwater	Change in Quality of Groundwater Discharging to Creeks and Rivers.		Primarily Tenas, and Four Creeks based on the EAC application.			
Fish Habitat	Change in Fish Habitat.	-	Only Four Creek is affected based on the EAC application.	Not Significant	Permanent is defined as a residual effect with duration lasts in perpetuity.	Irreversible
Visual Resources	Reduction in Visual Quality during Active Phases (Minesite).	-	-	Significant in Construction, Operation, and Decommissioning and Reclamation. Not Significant at the end of Post-Closure.	Medium-term – Visual disturbance that persists for up to the total duration of the Project phases over which the effect is being assessed.	Partially Reversible

Groundwater

Mitigation measures implemented during all Project phases are expected to avoid, minimize, or rehabilitate the potential adverse Project effects on the Groundwater VC; however, these effects are not anticipated to be fully mitigated and residual effects are anticipated for the following Groundwater VC subcomponents:

- Changes in groundwater levels around private wells;
- Changes in groundwater discharge rates to creeks and rivers;
- Changes to groundwater quality around private wells; and
- Changes in quality of groundwater discharging to creeks and rivers.

These effects are predicted to be Not Significant and to stabilize by the end of the Project life cycle.

De-watering during the Construction and Operation phase of the Project is anticipated to affect groundwater levels locally and none of the modelling scenarios predicted a change in groundwater levels in areas of private wells. Although unlikely, changes in groundwater levels in areas utilized by private well users may occur, potentially leading to a decrease in pumping yields. This could lead to adverse effects on both current and future generations because these effects are anticipated to be long-term. Nevertheless, these effects are anticipated to be Not Significant.

As outlined in Section 4, Chapter 4, Section 5.2.1.2.2., residual effects for changes in groundwater discharge rates to creeks and rivers during the operation phase may affect current generations where mining activities will change the physical properties of the ground, subsurface, and site drainage patterns. As the open pit and the waste and water management facilities expand over time, groundwater discharges to creeks and rivers will likely change, resulting in a reduction of flows to the creeks and rivers. Where post-closure groundwater discharge to creeks and rivers are higher than baseline surface water drainage volumes, there could be effects on future generations. However, these effects are predicted to be Not Significant.

Changes in groundwater quality around private wells are anticipated primarily to occur during the Operation and Post-closure phases where seepage from mine sources has the potential to reach the groundwater system utilized by private domestic well users. However, when mixed with background groundwater, no constituent is predicted to exceed the BC Water Quality Guidelines for drinking water sources (WQG DWS), but a small number of parameters are likely to increase compared to baseline. The Project is not expected to result in a change that will alter its integrity within the Groundwater RSA to an unacceptable level and the effect is predicted to be Not Significant.

Changes in quality of groundwater discharging to creeks and rivers are anticipated to occur during the Operations and Post-closure phases where contact water is expected to infiltrate underneath the waste and water management facilities into the ground and migrate slowly through the groundwater system to the valleys where it has the potential to reach surface water receptors. A change in quality of groundwater discharging to creeks and rivers is likely considering the proximity of the seepage sources (i.e., management ponds) to the creeks but is not expected to result in a change that will alter its integrity within the Groundwater RSA to an unacceptable level and is Not Significant.

The Project is not anticipated to cause substantial adverse residual effects on current and future generations related to groundwater. Telka Mining's commitment to implementation a follow-up strategy (described in the Minesite Water Management Plan – Appendix 13.11-E of the Tenas Project EAC submission) will evaluate the accuracy of effects predictions, effectiveness of proposed mitigation measures, and adaptively manage unanticipated effects. Monitoring programs focussed on changes to groundwater quality and quantity will be implemented prior to the Construction phase, and throughout the mine life and post-closure phase and will be reviewed on a frequency to be stipulated by future permit conditions.

Fish and Fish Habitat

The Project will be planned and developed to minimize potential effects on Fish and Fish Habitat. Despite unavoidable permanent changes to fish habitat in Four Creek (Telkwa Coal Ltd 2022h), effects assessed in the Tenas Project EAC submission were determined to be partially reversible, and Not Significant. Furthermore, changes were not expected to affect the productivity of the fish habitat. Mitigation measures are planned to maintain the integrity of the habitat. With implementation of fish habitat offsetting for harmful alteration, destruction, or disruption (HADDs) of fish habitats, a net gain of fish habitat productivity is predicted. However, changes could affect the economic, recreational, and cultural values of fisheries, especially for Indigenous communities.

Telkwa Mining has completed additional studies related to surface water and groundwater interaction on Four Creek to obtain more data and improve the accuracy of the modeling. The current understanding is that the predicted residual effects and their severity could be much less than those predicted in the original Tenas Project EAC submission (SLR Consulting 2025).

Visual Resources

The Project is expected to have a significant adverse residual effect during the Construction and Operation phases on the sub-component Visual Quality of the Visual Resources VC. The effect is predicted for the medium term as it will be partially reversible through the Decommissioning and the Reclamation and Post-closure phases. During the Reclamation and Post-closure phases especially, the Project will no longer generate light pollution from trucks, the parking lot, buildings, railway, or traffic, further reducing its visibility.

Mitigation measures to reduce or avoid potential effects of the Project on Visual Quality include:

- Limiting the Project footprint and Project Area;
- Project component design measures;
- Reclamation measures;
- Revegetation of disturbed areas; and
- Targeted vegetation screening.

Mitigations are not always completely effective, and as a result, Telkwa Mining is committed to monitoring and continuous improvements as time progresses.

Telkwa Mining will also incorporate the following mitigations into Project component design measures, including:

- Source point light fixtures for working areas only;
- Directing light sources on buildings to ground versus the horizon;
- Having fixed light sources automatically turn on and off based on ambient light conditions; and
- Directing light sources on equipment at work areas versus the horizon.

In consideration of the conclusions of the original Tenas Coal EA, the reduction in visual quality during active mine life will result in this effect being most prominent for the current generation. This is because the active mine life encompasses Years 1-25 of the Project. The effects of the Minesite during the Post-closure phase were determined to be Not Significant. The effect is partially reversible, with reclamation improving the site, the mine site during the post-closure phase (Telkwa Coal Limited 2022j).

Over time, the adverse residual effect on Visual Resources will decline as the reclaimed area becomes more densely revegetated (Luke Powell, Pers. Comm., November 13, 2023). Therefore, the effect to Visual Resources from the Project is predicted to be notable for current generations, but minimal for future generations.

Socio-economic

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Project planning. Telkwa Mining notes that comment OW-007 indicates that OW may provide additional information for the EAO's consideration.

Telkwa Mining looks forward to the opportunity to speak with House members and OW to better understand concerns regarding Project effects on Wet'suwet'en culture and land use.

Effects to socio-economic VCs (positive and adverse) were screened out, pursuant to the focused CFG Analysis criteria presented in Section 2.0. Positive residual socio-economic effects have been highlighted in Section 7.0.

4.1 MITIGATION AND MANAGEMENT PLANS

Mitigation measures presented in the Tenas Project EAC submission VC sections are consistent with the hierarchy of mitigation presented in the Policy for Mitigating Impacts on Environmental Values (Environmental Mitigation Policy) (Government of BC 2014). Specifics of mitigation measures and management plans proposed for the Project are based on industry Best Management Practices (BMPs), relevant guidance documents, review of measures and plans developed for similar projects, and professional experience.

The Project is governed by an Environmental Management System (EMS), an overarching management plan which enables Telkwa Mining to manage its environmental and safety performance in a holistic way. The EMS incorporates the Yintah Management Directives (YMD): Activities Using, Within and Around T'oh (Water) developed by the OW that describes Wet'suwet'en laws, policies, and water objectives that are to be followed when using or conducting activities within and around T'oh in the Wet'suwet'en Yintah (territory). As of March 2025, the EMS is comprised of 22 management plans. Additional management plans may be added as needed.

The measures and plans developed for the Project are designed to safeguard the interests of both current and future generations. The plans require continuous monitoring of residual effects. In the event a mitigation measure falls short of its desired outcome, a response is triggered to adjust mitigative actions such that adverse effects are brought back into alignment with prescribed plans.

The Project design and operational procedures have integrated various mitigation measures to minimize the duration and extent of effects predicted to be caused by the Project, thus minimizing effects on CFG. Key mitigation strategies and Management Plans relevant to the VCs with Significant, Long-term, or Irreversible effects identified for this focused CFG analysis are listed in Table 4.

Table 4 Project mitigation measures and management plans.

Mitigation Measure Categories	Project Management Plans
Avoid Sensitive Environments	Heritage Resources Management Plan
Limit Project Footprint and Project Area	Reclamation and Closure Plan
Reclamation Measures	Explosives Management Plan
Project Footprint Boundaries	Mine Emergency Management Plan
Transport Measures	Air Quality Management Plan
Project Component Design	Chemicals and Materials, Storage, Transfer, and Handling Management Plan
Blasting Measures	Construction Environmental Management Plan
Coal Processing Measures	Discharge Management Plan
Forest Management Practices	Fuel Management and Spill Control Plan
Management, Control, and Water Storage Pond Designs	Minesite Management Plan
Seepage Management Measures	Minesite Water Management Plan
Water Capture Measures	Metal Leaching/Acid Rock Drainage Management Plan
Project Use of Water	Occupational Health and Safety Plan
Water Quality Monitoring and Reporting Measures	Public Access Management Plan
Management of Metal Leaching/Acid Rock Drainage	Reclamation Closure Plan
People, Employees, Contractors, and Onsite Policies	Socio-Economic Management Plan
Occupational Health and Safety Program (OHSP)	Surface Erosion Prevention and Sediment Control Management Plan
Public Access Management	Waste Management Plan for Refuse and Emissions
Enhance Local and Regional Benefits including Employment	Wildlife Management Plan
Housing Measures	Visual Resources Management Plan
Indigenous Consultation and Engagement	Vegetation Management Plan
Consultation with Tenure Holders	Health and Medical Services Plan (new plan post-EAC application)
Compensation for Affected Commercial Tenure Holders	Environmental Management Systems

4.2 CUMULATIVE EFFECTS

Cumulative effects are changes to the environmental, economic, social, heritage, and/or health values and Indigenous interests caused when the Project's adverse residual effects combine with the adverse residual effects of other past, present, and reasonably foreseeable projects and activities.

The Cumulative Effects Assessment (CEA) was not redone for this CFG analysis but was based on the Tenas Project EAC submission CEA conducted for individual VCs and based on input from the original Tenas Project EAC submission authors. No changes in significance from the Tenas Project EAC submission were determined given the longer time scale being considered as part of the CFG analysis. Most biophysical VC related project effects are anticipated to return to levels representative of pre-project conditions by the time the Project reaches the end of the post-closure phase. As a result, no substantive changes, compared to the CEA submitted in the Tenas Project EAC submission, are expected based on an analysis of effects to CFG.

5.0 CONSIDERATION OF BC SUSTAINABLE DEVELOPMENT

The CFG analysis requirements of the BC EAO Effects Policy (Government of BC 2020a) includes describing how the Project is “aligned with relevant regional or provincial growth strategies?” (see Section 6.0). Sustainable development is a cornerstone of BC’s growth strategies broadly for both consideration of effects on current generations, but also long-term consideration of potential positive and adverse effects to future generations. It also provided helpful overarching context in advance of discussing specific growth strategies related to this CFG report.

As identified by the Government of BC, local government and community planning can contribute to building sustainable and resilient communities. This is central to long-term planning for future generations in the Project LSA and RSA. Local governments may include policies within their regional growth strategies and official community plans that support positive environmental, economic, social, and cultural values (Government of BC 2023b) that influence effects on CFG.

The province notes that:

- a) Sustainability: A sustainable community effectively balances interests to meet the needs of the present without compromising the ability of future generations to meet their needs; and
- b) Resilience: A resilient community has the capacity to adapt to changes such as shifting demographics and housing affordability, and “bounce back” from events such as economic downturns and the effects of a changing climate.

Characteristics of sustainable and resilient communities include complete and varied land use, compact development without urban sprawl, centers with diverse businesses, social, and cultural opportunities, and social and commercial connections facilitated by a mix of transit, active transportation, and public spaces (Government of BC 2023b). Environmentally sustainable and resilient communities reduce greenhouse gas emissions, protect agricultural and green spaces, and maintain wildlife habitat and corridors (Government of BC 2023b). Socio-economically sustainable and resilient communities are economically and socially diverse, have affordable and accessible housing and services, and plan resource use by considering community needs in the years and generations ahead, in addition to those in the present (Government of BC 2023b).

Telkwa Mining supports the social, economic, and environmental pillars of sustainability.

Social and Cultural

Telkwa Mining corporate governance outlines objectives, strategies, monitoring, and evaluation to remain accountable within its workforce and to the greater LSA. To achieve their objectives related to diversity and inclusion, they have implemented strategies such as the Indigenous Cultural Awareness and the People in Mining Awareness Induction training programs. This program aims to foster a culturally safe and inclusive workplace by educating employees and contractors on effective collaboration with colleagues from diverse backgrounds. It also focuses on retaining Indigenous employees and those from other equity-deserving groups, including visible minorities, women, and members of the 2SLGBTQI+ community. Work policies will further allow flexibility to enhance employee well-being by supporting family needs as well as personal career growth through training and worker wellness programs.

Telkwa Mining has contributed to and sponsored multiple local organizations and activities. It has also established two signature community events, a Family Fun Skating Day on BC Family Day in February, and a Summer Kick-off BBQ in June. Telkwa Mining is committed to providing land and support for the Telkwa Coalmine Recreation Camp (TCRC), situated in the Goathorn Creek Valley, just north of the Project. In collaboration with the Backcountry Horsemen of BC North Cariboo (BCHBCNC), Telkwa Mining takes pride in offering a safe, top tier facility for horse riders from across BC and the local region. This facility is readily available for use by the current generation with plans for future generations (Telkwa Coal Ltd. 2022b).

Economy

The Project's initial estimated capital cost is 123.5 million CDN\$ (2018 dollars) to achieve the full commercial production rate. Telkwa Mining anticipates that approximately 58% of construction workers (direct jobs), 90% of operations workers (total workforce), and 50% of decommissioning workers will be from the local region (Local Study Area 1 including RDBN Electoral Area A and RDBN Electoral Area G). Section 6.0 also outlines additional ways the Project supports the economy in accordance with provincial strategies and aims.

Further, Bathurst's (Telkwa Mining's parent company) environmental policy is committed to collaboratively working to meet the needs of the community—Telkwa Mining will foster sustainability and resilience in the region by increasing the skills of the local labour force and contributing to the availability and quality of social services throughout the LSA.

The Project will also contribute to supporting the centrality of Northwest BC in the British Columbia mining economy. With Smithers as a hub, Northwest BC is key to generating provincial mining direct and indirect revenues and jobs. Northwest BC accounted for over one third of BC's exploration projects in 2023 (Association for Mineral Exploration 2023). Out of all the municipalities in BC, Smithers has the 11th greatest number of mining operations suppliers, despite having a population just over 5,000 people (Mining Association of British Columbia 2022). 100 companies in Smithers supply \$95 million worth of goods and services to mining operations in the region (Mining Association of British Columbia 2022). The Project will bolster the current regional mining economy, helping to ensure that the current direct and indirect economic benefits from the mining sector continue to flourish.

Environment

Telkwa Mining endorses Bathurst's emissions trading scheme policy and its health, safety, environment, and community charter. These guidelines offer strategic direction on mitigating the environmental effects associated with its operational activities. During construction, management and mitigation plans will be implemented to minimize adverse effects to the environment and salvaging of material suitable for future reclamation. Progressive reclamation will be accomplished during the Operation and Construction phases, where available, which will include activities such as sloping, topsoil placement, and revegetation, further outlined in Section 1.2.2 of the Tenas Project EAC submission. This will allow the site to return as close to its original state as possible for future generations.

Adverse environmental effects are managed by developing construction and operations plans with the aim of mitigating adverse effects to the atmosphere by managing dust and emissions, to fish and water courses with Erosion and Sediment Control (ESC) measures and water quality testing, and to vegetation and wildlife with invasive species management and wildlife sweeps. Additionally, they will obtain and be compliant with any required permits and regulatory approvals.

Making Use of Existing Infrastructure

BC's Integrated Community Sustainable Planning (ICSP) Initiative motivates communities to envision their future and explore methods to enhance sustainability. This initiative aligns with broader provincial interests related to climate change, whilst simultaneously fostering healthier, more cost-effective, and sustainable communities (Government of BC 2007). A substantial advantage of the Project is its use of existing infrastructure and land characteristics, to minimize the Project Footprint. This contributes to the community and provinces sustainability and resilience goals by capitalizing on the efficiency gained from avoiding additional development and utilizing existing resources. This approach also reduces construction, and degradation impacts on CFG (Telkwa Coal Ltd 2022a) as provided below:

- 25 kilovolt (kV) BC Hydro grid within 3 km of the Project's Coal Processing Plant (CPP) which can provide access to renewable electricity;
- Two (2) communities located within 25 km of the Project that provide accommodations, services, and sources of labour. Potential adverse socio-economic effects for these two communities, whilst not discussed in detail here because they are Not Significant, Long-term or Irreversible, are further discussed in the original Tenas Coal EA, Telkwa Mining 2024 GBA Plus Chapter;
- Forestry Service Roads (FSRs) and private roads which provide easy access to the Project once a planned permanent bridge is re-installed over Goathorn Creek; and
- 15 km from an existing Class I railroad, which is owned and operated by Canadian National Railway.

Effects on both current and future generations in the Project's LSA/RSA are influenced by Telkwa Mining commitment to the social, economic, and environmental pillars associated with sustainable development as well as efficient use of resources and existing infrastructure to minimize adverse effects and enhance positive effects where possible.

6.0 PROJECT ALIGNMENT WITH REGIONAL AND PROVINCIAL GROWTH STRATEGIES

6.1 PROVINCIAL GROWTH STRATEGIES

The Government of BC has strategies and plans in place to promote sustainable growth and economic development which are beneficial for CFG. Those relevant to the Project are outlined in Table 5 along with supporting evidence to demonstrate Project alignment with these strategies.

New government actions are underway to support BC's mining sector (Government of BC 2019). To do this, BC is implementing a BC Mining Jobs Task Force, investing \$1 million for the development of a Mining Innovation Roadmap, and \$1 million to continue the BC Regional Mining Alliance, providing tax credits and increased investments in the Ministry of Energy, Mines and Petroleum Resources. Through job creation, direct, indirect, and induced economic effects, and contributions to government revenue through taxes and royalties, the Project will make substantial contributions to the economic wellbeing of the region and province more generally (Bennet 2021) in alignment with provincial growth strategies.

Table 5 Provincial strategies and plans.

Provincial Initiative	Objectives/Vision?	Tenas Project Alignment
The Stronger BC Economic Plan “Our economic plan is putting people first, delivering clean and inclusive growth, to build a stronger BC for everyone.”¹ The plan is broken out into categories of focus and the table below will outline where the Tenas Project will support this plan and BC’s future (Government of BC 2023a).	▪ Supporting people and families; ▪ Building resilient communities; ▪ Advancing true, lasting, and meaningful Reconciliation with Indigenous peoples; ▪ Meeting B.C’s climate commitments; ▪ Leading on environmental and social responsibility; and ▪ Fostering innovation across our economy. (Government of BC 2023b)	▪ The Tenas Project will pay provincial taxes of \$223 million, and these funds can be used by the government to support The Stronger BC Economic Plan; ▪ CAD \$250 million* in revenues for federal, provincial, and local governments to support community services and infrastructure, including social programs, education, and health care (Telkwa Coal Ltd. 2024); ▪ CAD \$82.4 million* in Capital costs (Telkwa Coal Ltd. 2024); ▪ CAD \$73 million in annual operating costs (Telkwa Coal Ltd. 2024); ▪ CAD \$45.38 million in total wages and salaries from the construction phase of the Project; ▪ CAD\$287.46 million in total wages and salaries from direct jobs during the operational phase; ▪ Telkwa Mining is committed to creating long-term, sustainable economic and community benefits for the region, including retaining more than 70 experts from Telkwa, Smithers and the Bulkley Nechako region; ▪ Providing land and support for the TCRC located in the Goathorn Creek Valley just north of the Project. Telkwa Mining is proud to work with the Back Country Horsemen of BC (BCHBC) to provide a safe and high-caliber facility for horse riders from all over BC and the local region; ▪ Telkwa Mining promotes safety, environmental, and socio-cultural awareness among its employees, visitors, community members, and contractors through training and education to increase understanding of each person’s roles and responsibilities (Telkwa Coal Ltd. 2024); ▪ Telkwa Mining is guided by Bathurst policies, such as the Remuneration and Nominations Committee Charter, which has corporate governance responsibilities regarding remuneration policies, diversity targets and objectives, and human resource policies (Bathurst 2024); and ▪ Telkwa Mining maintains communications with the community, also through the implementation of the SEMP and its Community Engagement Programs.

* The amounts are subject to change pending final mine plan.

¹ Province of BC, The StrongerBC Economic Plan, 2024 (Government of BC 2023a).

Table 5 (Cont'd.)

Provincial Initiative	Objectives/Vision?	Tenas Project Alignment
Together BC: BC's Poverty Reduction Strategy Offers guidance and principles to reduce overall poverty in BC. A 25% reduction in BC's overall poverty rate and a 50% reduction in the child poverty rate by 2024 (Government of BC 2019b).	▪ Making housing more affordable; ▪ Supporting families, children, and youth; ▪ Expanding Access to education and training; ▪ More opportunities, more jobs; ▪ Improving affordability; and ▪ Investing in social inclusion. (Government of BC 2019b)	▪ 150 to 170 full-time equivalent employees during peak construction and peak operations (Telkwa Coal Ltd. 2022); ▪ Telkwa Mining will provide on-the-job training for entry-level positions and support employees to upgrade their education. They will also collaborate with local educational institutions to develop high school and college training with mining sector content (Telkwa Coal Ltd. 2022); ▪ Telkwa Mining will fund at least one full-time position at a government-approved childcare facility in the Regional District of Bulkley- Nechako (RBDN), and at least one full-time position at a childcare facility operated by an Indigenous organization (Telkwa Coal Ltd. 2022); and ▪ Telkwa Mining maintains relationships with the Wet'suwet'en Nation and will continue to do so through the implementation of the Socio-economic Management Plan (SEMP). Telkwa Mining will implement the SEMP under consideration of the findings and recommendations of the National Inquiry into Missing Murdered Indigenous Women and Girls, the Truth and Reconciliation Commission, and the United Nations Declaration on the Rights of Indigenous Peoples (Telkwa Coal Ltd, 13.16, 2022).
Emerging Economy Task Force Provides analysis and advice on emerging trends, transformative technologies, and innovations, by looking at the current state of BC's economy (Government of BC, 2020b).	▪ Embracing technology and innovation; ▪ Leveraging B.C's green economy; ▪ Building a highly skilled and adaptable workforce; and ▪ Demonstrating public sector leadership. (Government of BC 2020b)	▪ 150 full-time equivalent employees during peak construction (Telkwa Coal Ltd. 2024); ▪ 170 full-time equivalent employees during peak operations over the 25-year mine life (Telkwa Coal Ltd. 2024); and ▪ 255 full-time equivalent indirect jobs during peak operations over the 25-year mine life (Telkwa Coal Ltd. 2024).

* The amounts are subject to change pending final mine plan.

Table 5 (Cont'd.)

Provincial Initiative	Objectives/Vision?	Tenas Project Alignment
First Nation Climate Initiative Economic self-determination and prosperity for Indigenous Communities.	- Fighting climate change; - Alleviating First Nations poverty; and - Reconciliation in action. (First Nations Climate Initiative 2024)	- Telkwa Mining is committed to consultation and engagement with the local First Nations during this EA Process and into the future; - Telkwa Mining supports Bathurst's Greenhouse Gas (GHG) Emissions goals and will work towards reducing Tier 1, 2 and 3 emissions due to the Project. - Telkwa Mining implements and maintains an effective EMS (planning, communication, checking, reporting, and reviewing) to monitor environmental performance (Telkwa Coal Ltd. 2024); and - Metallurgical coal is required to produce steel. There is currently not a commercially viable substitute for coal in the steel making process. Steel is an important engineering and construction material, making it a fundamental part of quality of life. Steel is part of a low carbon future, and is used in wind turbines, electric cars, and solar panels (Telkwa Coal Ltd. 2024)
Export Diversification Initiative The intent is to broaden Canada's reach by achieving 50% more overseas exports by 2025. Diversifying Canada's trade and investment opportunities (international.gc.ca).	- Leverage B.C.'s economic strengths to support sustainable, innovative, and inclusive economic growth; - Support B.C. businesses to access international opportunities; and - Better protect British Columbians from market volatility and geographically specific trends and changes. (Government of Canada 2024a)	The steelmaking coal from the Project will be shipped on the CN rail line to Prince Rupert's Ridley Terminal for export steel mills, most likely Asia (Telkwa Coal Ltd. 2024).
Transportation Strategies Deliver better services, invest in a sustainable economy, and make life more affordable. Move Commute Connect, BC's Active Transportation Strategy and Planning together BC Framework.	- Connecting people to where they need to go; - Inspiring British Columbians to choose active transportation; - Working together and planning for active transportation; - Resilience and Climate Action; and - Economic Competitiveness. (Government of BC 2019c & Government of BC 2024)	- Tenas Access Corridor which encompasses 11 km of newly constructed Bypass Road and improvements to approximately 5.0 km of an existing Forest Service Road (FSR) (Telkwa Coal Ltd. 2022a); - A permanent bridge over Goathorn Creek (Telkwa Coal Ltd. 2022a); - CAD \$250 million* in revenues for federal, provincial, and local governments to support community services and infrastructure, including social programs, education, and health care (Telkwa Coal Ltd. 2024); and - Telkwa Mining is committed to creating long-term, sustainable economic and community benefits for the region, including more than 70 experts from Telkwa, Smithers, and the Bulkley Nechako region retain for programs (Telkwa Coal Ltd. 2024);

* The amounts are subject to change pending final mine plan.

6.2 REGIONAL GROWTH STRATEGIES

The alignment of the Project with the goals and objectives of various regional initiatives is summarized in Table 6.

Table 6 Regional growth strategies and plans.

Regional Initiatives	Goals and Objectives	Tenas Project Alignment
Northwest BC Resource Benefits Alliance (RBA)	\$250 million to be spent over five years on planning and construction of civil and community infrastructure in Northwest BC.	- Should the Project be approved and developed, it will bring jobs and money into the community for 30+ years; - Telkwa Mining will contribute financially to the local economy through taxes, which will help support community goals and objectives outlined within; - Telkwa Mining will develop responsibility using the EA Process, specialist and implement management plans to limit the projects adverse effects;
Village of Telkwa Strategic Plan	Strategic Priority No. 4, economic development; business attraction and retention.	- Scientific studies related to the EA will gather information on the area to build a robust database of information to support future community planning; and - The Projects Restoration Management Plan will return the site to close to pre mine site conditions within increased access for recreation with upgrades to the FSR.
Smithers Telkwa Rural Official Community Plan, Bylaw No.1704, 2014, Schedule A	- It is recognized that agriculture, mining, and forest products industries are the backbone of the local economy, and the areas future relies on these industries; - Protect the natural ecology of the area and promote responsible public access to, and enjoyment of, the areas lakes and rivers; and - Community that protects their positive aspects and characteristics yet embrace and work towards necessary change for the benefit of the community.	- Telkwa Mining supports local community groups: - Bulkley Valley Bowmen; - Bulkley Valley Food Bank; - Bulkley Valley Hospital Foundation; - Bulkley Valley Kinsmen (Telkwa BBQ): - Coast Mountain College;
Regional District of Bulkley-Nechako Strategic Plan	Community and Economic Sustainability.	- Dze L K'ant Friendship Centre in Houston: - Smithers Curling Club; - Smithers Exploration Group; - Smithers Golf and Country Club; - Smithers Rodeo Club; - The Ark Playday Centre in Telkwa; - Telkwa Elementary School; and - Telkwa Museum: - Telkwa Reading Room.

7.0 PROJECT BENEFITS TO CURRENT AND FUTURE GENERATIONS

Telkwa Mining welcomes feedback from OW and remains committed to incorporating Wet'suwet'en knowledge and perspectives from engagement with OW and the results from OW studies (WWS, RIA, CUS) into Tenas Project planning. Telkwa Mining notes that comment OW-007 is related to economic benefits from the Project, including information including information discussed in this section of the *Tenas Project Environmental Assessment Transition Order: Current and Future Generations Analysis*

While effects to socio-economic VCs were screened out for consideration of residual effects, several positive socio-economic effects for future generations are still worth highlighting.

It was predicted in the Tenas Project EAC submission that jobs and training associated with the Labour and Economic Development VC will lead to increased skills for workers within the LSA. Telkwa Mining anticipates this will translate into a positive effect for current, and especially future generations through access to more and better employment and career opportunities (Sieminska, pers.comm., 2023; Mathewson, pers.comm., 2024).

To support this objective Telkwa Mining will work with OW during development of the Project to have training and processes in place to expand employment and career opportunities and identify pathways for promotion to senior or management level positions. These efforts will include specific initiatives to encourage Indigenous people, women, and gender diverse people to develop their skills and training in order that they may obtain the necessary qualifications and build experience to enable them to succeed in mid- and senior- or management-level positions.

Table 7 Hiring and economic benefits through employment.

Phase	Labour Cost – Contractors	FTE	Labour Cost – Telkwa Mining	FTE	Predicted LSA Employees
Construction	\$12.4 million	118.3	\$1.2 million	9.6	74
Operation	\$1.7 million / year	17	\$13.7 million / year	133	119
Decommission	\$1.1 million	10	\$2.4 million	20.6	39.8
Reclamation	n/a	n/a	\$5.9 Million	18.2	
Post-closure – active	n/a	n/a	\$74,000 / year	1	1
Post-closure – passive	n/a	n/a	\$37,000 / year	<1	1

(Telkwa Coal Ltd. 2022a; Telkwa Coal Ltd. 2022b)

To the extent that income is an important and influential social determinant of health, current and future generations are expected to experience health benefits because of better employment opportunities and increased household incomes. Income is a central contributing factor to health determinants such as food security, early child development, and access to education, as children raised in households with higher household income have improved health outcomes (Raphael et. Al. 2020). Some service providers in the area, interviewed for this assessment, predicted that regular sustained employment and increased access

to training could have a stabilizing ripple effect on the greater community over future decades (Batley, pers. comm. 2023; Bowen and Wiebe, pers. comm. 2023).

Benefits to future generations and those employed before and during mine closure will be supported by several funding programs. Telkwa Mining has committed to a Legacy Fund to generate long-term positive impacts through the Decommissioning and Reclamation phase and continue to provide former employees, employee spouses and dependents with donations and sponsorship opportunities for educational programs (Telkwa Coal Ltd. 2022i). The Project will also create long-term positive impacts for the Wet'suwet'en peoples through the creation of an Intergenerational Trust Fund. The Fund will ensure that a portion of the Project revenues will be saved for Wet'suwet'en future generations, while meeting the standards described in *Tsilhqot'in* 2014, that lands cannot "be developed or misused in a way that would substantially deprive future generations of the benefit of the land" (Telkwa Coal Limited 2022m).

The Project will also hire those who have been laid off by the closure or completion of other industrial projects in the area. The recent completion of construction on the Coastal Gaslink project, and the decline of forestry (exemplified by the 2023 closure of the Houston Canfor mill) means that there are skilled laborers in search of work in the LSA. Additionally, there are workers living in the LSA who were previously employed at the Huckleberry Mine but are now commuting (fly-in-fly-out) to remote northern mines since Huckleberry closed in 2016. The Project gives the opportunity for these workers to live and work in their home region and remain close to their families and social networks.

Due to pre-existing inequalities in the LSA and RSA, women, lower-income people, people with moderate to severe mental health challenges, people with disabilities, and Indigenous people are less likely to experience the direct benefits provided by the increase in jobs through the Project. However, socio-economic mitigations associated with the Project include providing training for entry-level positions for those without previous experience, provision of daily transportation to the work site, and Indigenous-specific training and support through programs such as the Indigenous Skills and Employment Training program (ISET) to improve access to funding for Indigenous people (Telkwa Coal Ltd. 2022i). [Furthermore, Telkwa Mining sets an employment target for approximately 15% of Wet'suwet'en First Nation workforce and 5% of procurement opportunities to Indigenous-owned businesses that employ at least 5% Indigenous people \(Telkwa Mining Ltd. 2025\).](#)

Because only 14% of workers in the Canadian mining sector are women, women are also expected to benefit less from the direct effects of job hiring and skills training (Natural Resources Canada 2019). With the implementation of Project mitigations, which are to include women-oriented recruitment and retention strategies, disparities in hiring rates between men and women are expected to be less pronounced.

Regarding predicted effects in the Tenas Project EAC submission related to the Infrastructure and Services VC, the increased tax base provided by the Project will allow local governments to spend more on housing and services. Over the long-term, the short-term effects on increased service and housing demands could shift to increased stock, improved quality, and lowered demand in the post-closure and remediation periods (Lindsay Bungartz, pers. comm., 2023).

8.0 CONCLUSION

The Tenas Project is a proposed surface metallurgical coal mine that is predicted to have both positive and adverse residual effects on current and future generations. As described in the Tenas Project EAC submission, and discussed here in the context of CFG, with the implementation of mitigation, adverse effects will be minimized, and positive effects will be enhanced. Anticipated positive effects include local and regional employment and economic benefits and improved understanding and knowledge of the local environment from environmental monitoring and the generation of multi-disciplinary scientific data.

Based on the Tenas Project EAC submission, the CFG analysis has focused on adverse residual effects to the Surface Water, Groundwater, and Fish and Fish Habitat VCs, although none of these effects were identified as Significant. A Significant adverse residual effect was identified for the Visual Resources VC due to the lasting effect of the mine site on the landscape during the Construction, Operation, and Decommissioning and Reclamation phases of the Project. With the application of measures described in the Reclamation and Closure Management Plan the effect is expected to be medium-term and partially reversible and to be Not Significant by the end of the post-closure phase. The effect on current generations will be more pronounced, but over time as the site revegetates, it is anticipated that visual values for future generations will improve.

9.0 REFERENCES

- Bathurst Resource Limited (Bathurst). 2024. Bathurst [Internet]. [Cited 2024 February 09] Available from: <https://bathurst.co.nz/>
- Bathurst Resources Limited. 2023. Corporate Governance, [Internet] [Cited 2023 December 28] Available from: <https://bathurst.co.nz/our-company/corporate-governance/>
- Bennett, Nelson. 2021. B.C mining innovation road map launched, [article] 2021.03.15, [Cited 2023 December 21] Available from: <https://biv.com/article/2021/03/bc-mining-innovation-roadmap-launched>
- First Nations Climate Initiative. 2024, First Nations Climate Initiative webpage [Internet]. [Cited 2024 December 9] Available from: First Nations Climate Initiative (fncionline.com)
- Government of Canada. 2019. Minerals Sector Employment. [Cited 2024 January 10] Available from: <https://natural-resources.canada.ca/science-data/science-research/earth-sciences/earth-sciences-resources/earth-sciences-federal-programs/minerals-sector-employment/16739>
- Government of BC. 2002. Public Consultation Policy Regulation, BC Ref.373/2002. [Internet] [Cited 2024 January 02] Available from: https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/373_2002
- Government of BC. 2007. Integrated Community Sustainability Planning (ICSP) Initiative, [Internet] April 16, 200 [Cited 2023 December 26] Available from: The Integrated Community Sustainability Planning (ICSP) Initiative (gov.bc.ca)
- Government of BC. 2014. Policy for Mitigating Impacts on Environmental Values (Environmental Mitigation Policy). [Cited 2023 December 29] Available from: https://www2.gov.bc.ca/assets/gov/environment/natural-resource-policy-legislation/environmental-mitigation-policy/em_policy_may13_2014.pdf
- Government of BC. 2019a. [Cited 2023 December 21] Available from: <https://news.gov.bc.ca/factsheets/new-government-actions-will-help-bcs-mining-sector-thrive>
- Government of BC. 2019b. Together BC: British Columbia's Poverty Reduction Strategy [Internet] [Cited 2023 December 21] Available from: <https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/initiatives-plans-strategies/poverty-reduction-strategy/togetherbc.pdf>
- Government of BC. 2019c. Move Commute Connect, June 2019, [Internet]. [Cited 2024 February 9] Available from: https://www2.gov.bc.ca/assets/gov/driving-and-transportation/funding-engagement-permits/grants-funding/cycling-infrastructure-funding/activetransportationstrategy_report_web.pdf
- Government of BC. 2020a. Effects Assessment Policy, Version 1.0, April 2020 [Internet][Cited 2024 January 11] Available from: https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/guidance-documents/2018-act/effects_assessment_policy_v1_-_april_2020.pdf

- Government of BC. 2020b. Emerging Economy Task Force, Final Report, March 2020, [Internet] [Cited 2023 December 21] Available from: https://www2.gov.bc.ca/assets/gov/employment-business-and-economic-development/economic-development/emerging-economy-task-force/eetf-final_report-20200511-final.pdf
- Government of BC. 2023b. Stronger BC [Internet]. [Cited 2023 December 21] Available from: <https://strongerbc.gov.bc.ca/>
- Government of BC. 2023b. Local government planning for sustainability and resilience, [Cited 2023 December 26] Available from: <https://www2.gov.bc.ca/gov/content/governments/local-governments/planning-land-use/local-government-planning/planning-for-sustainability-resilience>
- Government of BC. 2024. Planning Together BC website, 2024, [Internet]. [Cited 2024 February 9] Available from: <https://www2.gov.bc.ca/gov/content/transportation/transportation-infrastructure/transportation-planning/planningtogetherbc>
- Government of Canada. 2024a. Diversifying Canada's trade and investment opportunities, [Internet]. [Cited 2024 February 09] Available from: <https://www.international.gc.ca/gac-amc/campaign-campagne/trade-diversification-commerce/index.aspx?lang=eng>
- Government of Canada. 2024b. Statistics Canada, International Trade Statistics, 2024 [Internet]. [Cited 2024 February 9] Available from: International trade statistics (statcan.gc.ca)
- Natural Resources Canada. 2019. Minerals Sector Employment. Government of Canada [Internet]. [Cited 2024 February 07]. Available from: <https://natural-resources.canada.ca/science-data/science-research/earth-sciences/earth-sciences-resources/earth-sciences-federal-programs/minerals-sector-employment/16739>
- Raphael D, Bryant T, Mikkonen J, Raphael A. 2020. Social determinants of health: The Canadian facts, 2nd ed. Toronto (ON): Ontario Tech University Faculty of Health Science, York University School of Health Policy and Management [Internet]. [Cited 2024 January 14]. Available from: https://thecanadianfacts.org/The_Canadian_Facts-2nd_ed.pdf.
- RDBN. 2022. Strategic Plan 2022 – 2026 [Internet]. [Cited 2023 December 18] Available from: https://www.rdbn.bc.ca/application/files/4516/8866/7264/RDBN_Strategic_Plan_Report_Final_-_Approved_May_18_2023SO10yDww.pdf
- RDBN. 2014. Smithers Telkwa Rural Official Community Plan Bylaw No. 1704, 2014, Schedule A, Consolidated July 2016 [Internet]. [Cited 2024 February 13]. Available from: https://www.rdbn.bc.ca/application/files/3316/4425/5580/Bylaw_1704_Sch_A-A_OCP_consolidated_July_2021.pdf
- SLR Consulting. 2025. DRAFT Four Creek Watershed: Groundwater Surface Water Interaction Investigation and Water Balance Model Development.
- Telkwa Coal Ltd. 2024. Telkwa Coal Limited (website) [Internet]. [Cited 2024 February 9] Available from: <https://www.telkwacoal.com>

- Telkwa Coal Ltd. 2022a. Tenas Environmental Assessment, Section 0.0 Application Summary, May 2022, V1.0 [Internet]. [Cited 2023 December 18] Available from: https://projects.eao.gov.bc.ca/api/public/document/627c1bc09a50630022285b9f/download/00.0_ApplicationSummary_May2022-.pdf
- Telkwa Coal Ltd. 2022b. Tenas Environmental Assessment, Part A Introduction, Section 1.0 Overview and Project Proponent Description, May 2022, V1.0 [Internet]. [Cited 2023 December 18] Available from: https://projects.eao.gov.bc.ca/api/public/document/627c1c1d9a50630022285bed/download/01.0_Overview_May2022_Part_A-.pdf
- Telkwa Coal Ltd. 2022c. Tenas Environmental Assessment, Section 2.0 Environmental Assessment, EA Process, Chapter 1 Provincial and Federal EA Process, May 2022, V1.0 [Internet]. [Cited 2023 December 18] Available from: https://projects.eao.gov.bc.ca/api/public/document/627c1cff0df8410022b07765/download/02.0_EA%20Process_May2022-.pdf
- Telkwa Coal Ltd. 2022d. Tenas Environmental Assessment, Section 3.0 Assessment Methodology, Chapter 1, May 2022, V1.0 [Internet]. [Cited 2023 December 18] Available from: https://projects.eao.gov.bc.ca/api/public/document/627c1d039a50630022285c41/download/03.0_Method_May2022-.pdf
- Telkwa Coal Ltd. 2022e. Tenas Environmental Assessment, Section 4.0 Environmental Effects Assessment Chapter 3, Surface Water Valued Component, May 2022, V1.0 [Internet]. [Cited 2023 December 18] Available from: https://projects.eao.gov.bc.ca/api/public/document/627c1d8f9a50630022285c90/download/04.3_SurfaceWater_May2022-.pdf
- Telkwa Coal Ltd. 2022f. Tenas Environmental Assessment, Section 4.0 Environmental Effects Assessment, Chapter 4, Groundwater Valued Component, May 2022, V1.0 [Internet]. [Cited 2023 December 18] Available from: https://projects.eao.gov.bc.ca/api/public/document/627c1d8d9a50630022285c8d/download/04.4_Groundwater_May2022-.pdf
- Telkwa Coal Ltd. 2022g. Tenas Environmental Assessment, Section 4.0 Environmental Effects Assessment Chapter 5 Aquatic Resources Valued Component, May 2022, V1.0 [Internet]. [Cited 2023 December 18] Available from: https://www.projects.eao.gov.bc.ca/api/public/document/627c1d7e0df8410022b07784/download/04.5_Aquatic_May2022-.pdf
- Telkwa Coal Ltd. 2022h. Tenas Environmental Assessment, Section 4.0 Environmental Effects Assessment Chapter 6 Fish and Fish Habitat Valued Component, DRAFT, May 2022, V1. [Internet]. [Cited 2023 December 18] Available from: https://www.projects.eao.gov.bc.ca/api/public/document/627c1d869a50630022285c87/download/04.6_Fish%20and%20Fish%20Habitat_May2022-.pdf
- Telkwa Coal Ltd. 2022i. Tenas Environmental Assessment, Section 5.0 Economic Effects Assessment, Chapter 2 Economic Development Valued Component, May 2022, V1. [Internet]. [Cited 2023 August 1]. Available from: https://projects.eao.gov.bc.ca/api/public/document/627c5503558c860022682d00/download/05.2_EconDev_May2022-.pdf

- Telkwa Coal Ltd. 2022j. Tenas Environmental Assessment, Section 6.0 Social Effects Assessment, Chapter 2, Visual Resources Valued Component, May 2022, V1. [Internet]. [Cited 2024 January 29] Available from: https://projects.eao.gov.bc.ca/api/public/document/627c20450df8410022b0783d/download/12.0_PublicConsult_May2022-.pdf
- Telkwa Coal Ltd. 2022k. Tenas Environmental Assessment, Section 12.0 Public Consultation, May 2022, V1. [Internet]. [Cited 2024 January 29] Available from: https://projects.eao.gov.bc.ca/api/public/document/627c20450df8410022b0783d/download/12.0_PublicConsult_May2022-.pdf
- Telkwa Coal Ltd. 2022l. Tenas Environmental Assessment, Section 13.0 Management Plans, Chapter 16 Socio-economic Management Plan, May 2022, V1 [Internet]. [Cited 2024 February 9] Available from: https://projects.eao.gov.bc.ca/api/public/document/627c22e4c1c29b0022b32fa9/download/13.16_SocioEconMgmtPlan_May2022-.pdf
- Telkwa Coal Ltd. 2022m. Tenas Environmental Assessment, Section 11.0 Wet'suwet'en Rights and Interests Assessment, May 2022, V1 [Internet]. [Cited 2024 February 9] Available from: https://www.projects.eao.gov.bc.ca/api/public/document/627c200b0df8410022b07832/download/11.0_Wet'suwet'en%20Part%20C_May2022-_Part1.pdf
- Telkwa Mining Ltd. 2024, Tenas Project Environmental Assessment, GBA Plus Report: Disproportionate impacts do distinct populations in the proposed Tenas Coal Mine Local Service, March 2024
- Village of Telkwa. 2022. Village of Telkwa Official Community Plan Bylaw No. 613, 2011 [Internet]. [Cited 2023 December 21] Available from: <https://telkwa.civicweb.net/filepro/documents/2525/?preview=12944>
- Village of Telkwa. 2023. Telkwa Strategic Plan 2023 – 2026 Draft [Internet]. [Cited 2023 December 18] Available from: https://hatcon.sharepoint.com/:b:/r/sites/canada/Shared%20Documents/Marketing/Proposal%20Toolkit/Chargeout%20Rates/Individual%20Staff%20Levels%20and%20Rates_20231215.pdf?csf=1&web=1&e=1G9WKP

APPENDICES

Appendix A1

Personal Communications

Interviews – Tenas EA 2022 Technical Leads

Contact	Organization	Title	Interview Date
Andrew Mathewson	ERM	Principal Consultant, Social Performance	01.09.2024
Annette Muttray	Enita Environmental Consultants	Senior Environmental Specialist	11.10.2023
Cathy McKay	Edynamics	Chief Operating Officer	10.23.2023 12.20.2023
Daniel Walker	ERM	Senior Consultant, Archaeology	11.08.2023
Gregory Fagerlund	SRK	Associate, Senior Consultant	10.19.2023
Klaudia Sieminska	ERM	Principal Technical Consultant, Social Performance	12.01.2023
Lindsey Bungartz	ERM	Principal Consultant, Social Performance	11.27.2023
Luke Powell	ERM	GIS Managing Technical Consultant	11.16.2023
Nancy Chan	Ausenco	Atmospheric Specialist	10.04.2023
Rick Palmer	Palmer	CEO, Fisheries Biologist	01.05.2024
Samantha Barnes	SRK	Hydrotechnical Engineer	10.17.2023

Interviews – LSA Service Providers

Contact	Organization	Title	Interview Date
Ashley Ridgeway	Houston Community Services Organization	Family Support Coordinator	10.23.2023
Laura Niessen Maj Neil Wilkinson	Houston Salvation Army	Community Ministries Director Major	10.23.2023
Cpl Nathan Fox	Houston RCMP	Corporal	10.23.2023
Marian Ellis Jennifer Williams	Link to Learning - Houston	Manager Education and Training Manager	10.23.2023
Juanita Hagman Sandra Lavallie	Thomas Robinson	Executive Director Administration/HR/IT Director	10.24.2023
Ted Cullis	Telkwa and District Senior Society	President	10.24.2023
Kim Martinsen	Community Futures	General Manager	10.24.2023
Myung Kim	Smithers Community Services Association	Executive Director	10.24.2023

Interviews – LSA Service Providers (Cont'd.)

Contact	Organization	Title	Interview Date
Carol Seychuk Britt	Northern Society for Domestic Peace	Executive Director	10.25.2023
Susanne		Admin Assistant, CAMP and CAMP(us) services	
Tina		Stopping the Violence Counselling + Men's Services	
Bronwyn		Stopping the Violence Outreach Services Coordinator Passage Transition House / Third Stage Housing	
Shannon Cote Patti Zacharias	Northwest Child Development Centre	Program Coordinator of Early Years Regional Office Administrator	10.25.2023
John McDivitt	Telkwa Seniors Housing Society	President	10.25.2023
Cormac Hikisch	Northern Health	Regional Health Services Administrator	10.25.2023
Emma Bowen	Dze L Kant Friendship Centre	Aboriginal Early Childhood Development Coordinator	10.26.2023
Carrie Wiebe		Aboriginal Family Connections Coordinator	
Dana Gorbahn	Gorbahn Professional	Founder, CEO	10.26.2023
Paul Batley	RCMP	Victim Services Manager	11.29.2023
Robert MacDonald	Ministry of Family and Child Services	Director of Operations - Bulkley Valley and Hazelton	12.10.2023
Perry Rath Morgan Powell Ryan Armstrong Tara	Smither's Pride Society	Board and members	02.06.2025

Appendix A2

Residual Effects Matrix

Summary of Residual Effects

Notes: C, O, D, P represent Project Phases: (C)onstruction, (O)peration, (D)ecommissioning and Reclamation, (P)ost-closure
Magnitude: Low (L), Moderate (M), High (H)
Geographic Extent: Local (LSA), Regional (RSA), Beyond Regional (BR)
Duration: Short-term (ST), Medium-term (MT), Long-term (LT)
Frequency: Infrequent (IF), Frequent (FF), Continuous (CF)
Reversibility: Fully reversible (FR), Partially reversible (PR), Irreversible (IR)
Context: High (H), Moderate (M), Low (L)
Significance: Not-Significant (NS), Significant (S)
Likelihood: Likely (L), Unlikely (UL)
Level of Confidence: High (H), Moderate (M), or Low (L).

					Residual Effects Characterization								
Valued Component	Residual Adverse Effects	Contributing Activities within the Project Phases (C, O, D, P)	Proposed Mitigation Measures	Subcomponent	Significance	Magnitude	Geographic Extent	Duration	Frequency	Reversibility	Context	Likelihood	Level of Confidence
Atmospheric	Increase in Ambient Criteria Air Contaminant (CAC) Concentrations	All activities (O)	▪ Limit Project footprint and Project Area ▪ Reclamation measures ▪ Transport measures ▪ Blasting measures. See Explosives Management Plan (S13.0-C6) (EMP) ▪ Load management for processed coal trucks ▪ Drop height reduction. See Air Quality Management Plan (S13.0-C2) (AQMP) ▪ Vehicle and equipment fleet selection and maintenance (AQMP) ▪ Wood or oil stove replacement program	Air Quality	NS	M	LSA	MT	CF	FR	M	L	H
Atmospheric	Increase in Greenhouse Gas (GHG) Emissions	All activities (O)	▪ Transport measures ▪ Coal processing measures ▪ Vehicle and equipment fleet selection and maintenance (AQMP)	GHG Emissions	NS	M	BR	LT	CF	PR	H	L	H
Atmospheric	Increase in Ambient Noise Levels	All activities (O)	▪ Limit Project footprint and Project Area ▪ Blasting measures (EMP) ▪ Vehicle and equipment fleet selection and maintenance (AQMP)	Noise	NS	M	LSA	MT	CF	FR	M	L	H
Terrain and Soils	Changes to Terrain from Vegetation and Rock Removal	All Activities (C, O, D, P)	▪ Avoid sensitive environments; ▪ Limit Project footprint and Project Area; ▪ Reclamation measures (refer to RCP); ▪ Transport measures; ▪ Project footprint boundaries; ▪ Forest management practices; ▪ Project siting and construction; ▪ Vegetation clearing and soil salvage (Refer to CEMP, RCP and VMP); and ▪ Erosion and sediment control (Refer to CEMP and SEPSCP). ▪ Additional VC-specific reclamation measures (Refer to RCP, VMP, CEMP, and SEPSCP)	Terrain Stability	NS	M	LSA	LT	IF	PR	L	L	H

					Residual Effects Characterization								
Valued Component	Residual Adverse Effects	Contributing Activities within the Project Phases (C, O, D, P)	Proposed Mitigation Measures	Subcomponent	Significance	Magnitude	Geographic Extent	Duration	Frequency	Reversibility	Context	Likelihood	Level of Confidence
Terrain and Soils	Loss of Soils and Changes to Quality Due to Changes in Physical and Chemical Properties	All Activities (C, O, D, P)	- Avoid sensitive environments ; - Limit Project Footprint and Project Area; - Reclamation measures (refer to RCP); - Project Footprint boundaries; - Transport measures; - Forest management practices - Blasting measures (refer to EMP); - Project siting and construction; - Vegetation clearing and soil salvage (Refer to CEMP, RCP and VMP); - Erosion and sediment control (Refer to CEMP and SEPSCP); - Additional VC-specific reclamation measures (Refer to RCP, VMP, CEMP, and SEPSCP) - Dust suppression and air emissions (Refer to AQMP, MTCP); and - Spill prevention and response (Refer to FMSCP)	Soil Quality	NS	M	LSA	LT	IF	PR	L	L	H
Surface Water	Change in Mean Annual Discharge (MAD)	All activities (C, O, D, P)	- Limit Project footprintand Project Area - Reclamation measures (refer to RCP) - Water capture measures	Surface Water Quantity	NS	L	LSA	LT	C	IR	M	L	M
Surface Water	Change in Seasonal Flow Distribution	All activities (O, D, P)	- Seepage management measures - Water capture measures	Surface Water Quantity	NS	L	LSA	LT	CF	IR	M	L	M
Surface Water	Change in Low and High Flows	All activities (O, D, P)	- Water capture measures - Seepage management measures	Surface Water Quantity	NS	L	LSA	LT	IF	IR	M	UL	M
Surface Water	Change in Modelled Parameter Concentrations	All activities (C, O, D, P)	- Erosion and sediment control (refer to SEPSCP, CEMP, and MWMP) - Management of ML/ARD - Blasting measures - Water capture measures - Reclamation measures(refer to RCP)	Surface Water Quality	NS	L	LSA	ST	IF	PR	M	UL	M
Surface Water	Change in other measurable water quality parameters	All activities (C, O, D, P)	- Management of ML/ARD - Transport measures - Erosion and sediment control (refer to SEPSCP, CEMP, and MWMP) - Hazardous material and refueling (refer to FMSCP)	Surface Water Quality	NS	L	LSA	LT	IF	IR	M	L	M
Groundwater	Changes to Groundwater Level in Area of the Private Wells	- Mining the open pit (O) - Operation of Surface Water Management Infrastructure including channels and ponds (O). - Reclamation and closure activities at Minesite (D) - Maintain post-mining systems and ongoing monitoring (P)	- Limit Project footprint and Project Area - Management, control, and water storage pond designs - Project use of water - Flooding of the open pit in Decommissioning and Reclamation, and Post-closure phases of Project		NS	N	LSA	LT	CF	IR	M	UL	M
Groundwater	Change in Groundwater Discharge Rates to Creeks and Rivers	- Mining the open pit (O) - Operation of Surface Water Management Infrastructure including channels and ponds (O) - Reclamation and closure activities at Minesite (D) - Maintain post-mining systems and ongoing monitoring (P)	- Limit Project footprint and Project Area - Management, control, and water storage pond designs - Project use of water - Flooding of the open pit in Decommissioning and Reclamation, and Post-closure phases of Project		NS	L	LSA	LT	CF	IR	M	L	M
Groundwater	Changes to Groundwater Quality at Private Wells	- Mining the open pit (O) - Operation of Surface Water Management Infrastructure including channels and ponds (O) - Reclamation and closure activities at Minesite (D) - Maintain post-mining systems and ongoing monitoring (P)	- Management, control, and water storage pond designs - Blasting measures (refer to EMP) - Management of ML/ARD (refer to ML/ARDMP) - Spill management (FMSCP) - Chemical and materials storage and handling (CMSTHP)		NS	L	LSA	LT	CF	IR	M	L	M
Groundwater	Change in Quality of Groundwater Discharging to Creeks and Rivers		Additional VC-specific measure to reduce nitrogen release (EMP)		NS	L	LSA	LT	CF	IR	M	L	M

Residual Effects Characterization													
Valued Component	Residual Adverse Effects	Contributing Activities within the Project Phases (C, O, D, P)	Proposed Mitigation Measures	Subcomponent	Significance	Magnitude	Geographic Extent	Duration	Frequency	Reversibility	Context	Likelihood	Level of Confidence
Aquatic Resources	Changes in Water Quality	Maintain post-mining systems and ongoing monitoring (P)	• Limit Project footprint and Project Area • Avoid sensitive environments • Reclamation measures (Refer to RCP) • Project footprint boundaries • Transport measures • Seepage management measures • Erosion and sediment control (Refer to SEPSCP and MWMP) • Water capture measures • Spill prevention and response (Refer to FMSCP) • Water quality monitoring and reporting measures		NS	H	LSA	ST	IF	PR	M	U	M
Fish Habitat	Change in Fish Habitat	• All Activities (C) • Surface water management (O) • Removal and dismantling of mining equipment and facilities (D) • Reclamation and closure of Project (D)	• Limit Project footprint and Project Area • Avoid sensitive environments • Reclamation measures (Refer to RCP) • Project footprint boundaries • Transport measures • Project use of water • Management of ML/ARD (Refer to ML/ARDMP) • Erosion and sediment control (Refer to SEPSCP, CEMP and MWMP) • Water withdrawal or diversion • Restoration and reclamation		NS	H	LSA	PT	CF	IR	H	L	H
Vegetation	Alteration/loss of vegetation, ecosystems, and wetlands	• Site clearing (clearing, grubbing, soil stripping and salvaging) (C) • Transportation of equipment, materials, and personnel (C, O, D, P) • Construction and installation of all Project components (C) • Mining (O) • Operation of surface water management systems, Coal Preparation Plant (O) • Maintenance of roads, bridge, Rail Infrastructure, powerline and substation, water discharge infrastructure, material storage piles, materials handling systems and solid waste management systems (O) • Progressive reclamation of completed mine areas (O) • Dismantling and removal of mining equipment and facilities (including powerline, Rail Infrastructure) (D) • Reclamation and closure of roads, bridge, Powerlines, Rail Infrastructure (D) • Implementation of post-mining systems and monitoring (D)Maintenance of post-mining systems and ongoing monitoring (P)	• Project siting and construction • Vegetation clearing and soil salvage • Invasive plant management • Erosion and sediment control • Management of ML/ARD • Dust suppression and air emissions • Spill prevention and response • Additional VC-specific reclamation measures	Old Growth Forest	NS	M	LSA	LT	FF	FR	M	L	M
				Wetlands	NS	M	LSA	MT	FF	PR	M	L	M
				Listed Ecological Communities	NS	M	LSA	LT	FF	PR	H	L	M
				Culturally Important Species	NS	M	LSA	MT	FF	FR	L	L	M
				Rare Plants and Lichens	NS	L	LSA	LT	FF	PR	M	UL	M
Vegetation	Trace metals deposition	• Site clearing (clearing, grubbing, soil stripping and salvaging) (C) • Transportation of equipment, materials, and personnel (C, O, D, P) • Construction and installation of all Project components (C) • Mining (O) • Operation of surface water management systems, coal preparation plant (O) • Maintenance of roads, bridge, Rail Infrastructure, powerline and substation, water discharge infrastructure, material storage piles, materials handling systems and solid waste management systems (O) • Progressive reclamation of completed mine areas (O) • Dismantling and removal of mining equipment and facilities (including powerline, Rail Infrastructure) (D) • Reclamation and closure of roads, bridge, powerlines, Rail Infrastructure (D) • Implementation of post-mining systems and monitoring (D)Maintenance of post-mining systems and ongoing monitoring (P)	• Vegetation clearing and soil salvage • Erosion and sediment control • Management of ML/ARD • Dust suppression and air emissions • Spill prevention and response • Additional VC-specific reclamation measures	Old Growth Forest	NS	L	LSA	LT	FF	FR	M	L	M
				Wetlands	NS	M	LSA	LT	FF	FR	M	L	M
				Listed Ecological Communities	NS	M	LSA	LT	FF	FR	H	L	M
				Culturally Important Species	NS	L	LSA	LT	FF	FR	L	L	M
				Rare Plants and Lichens	NS	L	LSA	LT	FF	FR	M	U	M

Residual Effects Characterization													
Valued Component	Residual Adverse Effects	Contributing Activities within the Project Phases (C, O, D, P)	Proposed Mitigation Measures	Subcomponent	Significance	Magnitude	Geographic Extent	Duration	Frequency	Reversibility	Context	Likelihood	Level of Confidence
Avian Species	Alteration and/or Loss of Habitat	• Transportation of equipment, materials, and personnel (C, O, D, P) • Site clearing (C) • Construction of Surface Water Management Infrastructure; Bypass Road; haul roads and service roads; Goathorn Creek Bridge; Coal Processing Plant(CPP); Administration Building; powerline and substation; Rail Infrastructure; water discharge infrastructure; and material handling systems (C) • Improvements to existing private road and Forest Service Roads (FSR) (C) • Mining the open pit (O) • Operation of Surface Water Management Infrastructure; CPP; water discharge infrastructure; material handling systems; and solid waste management systems (O) • Maintenance of Bypass Road; improved private road and FSR; haul roads and service roads; bridge over Goathorn Creek; Administration Building; powerline and substation; Rail Infrastructure; and storage piles and stockpiles (O) • Progressive reclamation (O) • Dismantle and remove mining equipment and facilities (D) • Reclamation and closure activities at Minesite (D) • Reclamation and closure of Bypass Road; bridge over Goathorn Creek; powerline and substation; and Rail Infrastructure (D) • Implement post-mining systems and monitoring (D) • Maintain post-mining systems and ongoing monitoring (P)	• Avoid sensitive environments • Minimize Project footprint and Project Area • Reclamation measures • Project footprint boundaries • Transport measures • Project component design • Blasting measures • Coal processingmeasures • Seepage management measures • Water capture measures • Management of ML/ARD • Timing considerations • Establish no-activity buffers around nests • Wildlife education program • Wildlife protection protocols	Migratory Breeding Birds	NS	L	LSA	LT	CF	FR	M	L	M
				Listed Bird Species	NS	L	LSA	LT	CF	FR	M	L	M
				Raptors	NS	L	LSA	LT	CF	FR	M	L	M
Avian Species	Change in Mortality	• Transportation of equipment, materials, and personnel (C, O, D, P) • Site clearing (C) • Construction of Surface Water Management Infrastructure; Bypass Road; haul roads and service roads; Goathorn Creek Bridge; CPP; Administration Building; powerline and substation; Rail Infrastructure; water discharge infrastructure; and material handling systems(C) • Improvements to existing private road and FSR (C) • Mining the open pit (O) • Operation of Surface Water Management Infrastructure; CPP; water discharge infrastructure; material handling systems; and solid waste management systems (O) • Maintenance of Bypass Road; improved private road and FSR; haul roads and service roads; bridge over Goathorn Creek; Administration Building; powerline and substation; Rail Infrastructure; and storage piles and stockpiles (O) • Progressive reclamation (O) • Dismantle and remove mining equipment and facilities (D) • Reclamation and closure activities at Minesite (D) • Reclamation and closure of Bypass Road; bridge over Goathorn Creek; powerline and substation; and Rail Infrastructure (D) • Implement post-mining systems and monitoring (D) • Maintain post-mining systems and ongoing monitoring (P)	• Avoid sensitive environments • Minimize Project footprint and Project Area • Project footprint boundaries • Transport measures • Project component design • Blasting measures • Coal processing measures • Seepage management measures • Water capture measures • Management of ML/ARD • People, employees, contractors, and onsite policies • Powerline design and siting • Timing considerations • Establish "no activity" buffers around nests • Wildlife education program • Wildlife protection protocols • Manage chemical hazards • Manage potential attractants	Migratory Breeding Birds	NS	L	LSA	LT	IF	FR	M	L	M
				Listed Bird Species	NS	L	LSA	LT	IF	FR	H	L	M
				Raptors	NS	L	LSA	LT	IF	FR	H	L	M
Avian Species	Change in Movement	• Transportation of equipment, materials, and personnel (C, O, D, P) • Site clearing (C) • Construction of Surface Water Management Infrastructure; Bypass Road; haul roads and service roads; Goathorn Creek Bridge; CPP; Administration Building; powerline and substation; Rail Infrastructure; water discharge infrastructure; and material handling systems (C) • Improvements to existing private road and Forest Service Roads (C) • Mining the open pit (O) • Operation of Surface Water Management Infrastructure;CPP; water discharge infrastructure; material handling systems; and solid waste management systems (O) • Maintenance of Bypass Road; improved private road and FSR; haul roads and service roads; bridge over Goathorn Creek; Administration Building; powerline and substation; Rail Infrastructure; and storage piles and stockpiles (O) • Progressive reclamation (O) • Dismantle and remove mining equipment and facilities (D) • Reclamation and closure activities at Minesite (D) • Reclamation and closure of Bypass Road; bridge over Goathorn Creek; powerline and substation; and Rail Infrastructure (D) • Implement post-mining systems and monitoring (D) • Maintain post-mining systems and ongoing monitoring (P)	• Avoid sensitive environments • Minimize Project footprint and Project Area • Reclamation measures • Project footprint boundaries • Transport measures • Project component design • Blasting measures • Coal processing measures • Seepage management measures • Water capture measures • Management of ML/ARD • Powerline design and siting • Timing considerations • Establish "no activity" buffers around nests • Wildlife education program • Wildlife protection protocols • Manage chemical hazards • Manage potential attractants	Migratory Breeding Birds	NS	L	RSA	LT	FF	FR	M	L	M
				Listed Bird Species	NS	L	RSA	LT	FF	FR	M	L	M
				Raptors	NS	L	RSA	LT	FF	FR	M	L	M

					Residual Effects Characterization								
Valued Component	Residual Adverse Effects	Contributing Activities within the Project Phases (C, O, D, P)	Proposed Mitigation Measures	Subcomponent	Significance	Magnitude	Geographic Extent	Duration	Frequency	Reversibility	Context	Likelihood	Level of Confidence
Heritage	No table 5.5-1 (There were no residual effects following mitigation; therefore, no effects are carried forward to either the residual characterisation or the CEA.)												
Human Health	Changes in Human Health due to Project-related Changes in Air Quality from CACs	All activities (O)	• Limit Project footprint and Project Area • Reclamation measures (refer to RCP) • Transport measures • Blasting measures (EMP) • Dust suppression and air emissions (refer to AQMP and MTCP) • Vehicle and equipment fleet selection and maintenance (AQMP) • Wood or oil stove replacement program		NS	L	LSA	MT	FF	FR	L	UL	H
Human Health	Changes in Human Health due to Project-related Changes in Non carcinogenic Metal COPC Concentrations in Environmental Media	All activities (O, D, P)	• Limit Project footprint and Project Area • Reclamation measures (refer to RCP) • Transport measures • Blasting measures (EMP) • Dust suppression and air emissions (refer to AQMP and MTCP) • Management of ML/ARD (refer to ML/ARDMP) • Management of hazardous materials and wildlife attractants (refer to FMSCP and WMPRE and WMP) • People, employees, contractors, and onsite policies • Public access management (refer to PAMP)		NS	M	LSA	LT	IF	FR	L	UL	M
Human Health	Changes in Human Health due to Project-related Changes in Carcinogenic Metal COPC Concentrations in Environmental Media Other Than Air (Ingestion Pathway)	All activities (O, D, P)	• Limit Project footprint and Project Area • Reclamation measures (refer to RCP) • Transport measures • Blasting measures (EMP) • Dust suppression and air emissions (refer to AQMP and MTCP) • Management of ML/ARD (refer to ML/ARDMP) • Management of hazardous materials and wildlife attractants (refer to FMSCP and WMPRE and WMP) • People, employees, contractors, and onsite policies • Public access management (refer to PAMP)		NS	L	LSA	LT	IF	PR	L	UL	M
Human Health	Changes in Human Health due to an Increase in Ambient Noise Levels	All activities (O)	• Limit Project footprint and Project Area • Transport measures • Blasting measures (EMP) • Vehicle and equipment fleet selection and maintenance (AQMP)		NS	M	LSA	MT	CF	FR	M	L	H
Infrastructure and Services	Increase in Cost or Decrease in Availability of Housing and Accommodations	Employment and Labour (O)	• Procurement Program (SEMP) • Housing and Accommodation Program (SEMP) • Education and training support (SEMP) • Community Engagement Programs (SEMP)	Housing and Accomodations	NS	M	LSA	ST	CF	FR	H	L	M
Infrastructure and Services	Increased Demand for Community Infrastructure and Services (increased demand for child care services)	Employment and Labour (O)	• Procurement Program (SEMP) • Education and training support (SEMP) • Child Care Program (SEMP) • Community Engagement Programs (SEMP)	Community and Infrastructure Services	NS	M	LSA	LT	CF	FR	H	L	M
Infrastructure and Services	Change in the Use of Roads and Related Increased in Traffic	Transportation of equipment, materials, and personnel (C, D)	• Minimize Project footprint and Project Area • Transport measures • Traffic Management • Land use agreements • Community Engagement Programs (SEMP)	Transportation	NS	L	LSA	ST	FF	FR	H	L	L
Demographics	Change in population and related demographic factors	Labour and employment (O)	• Enhance local and regional benefits including employment • Education and training support (Socio-Economic Management Plan (\$13.0-C16)) (SEMP)		NS	L	LSA	LT	CF	PR	L	L	H

					Residual Effects Characterization								
Valued Component	Residual Adverse Effects	Contributing Activities within the Project Phases (C, O, D, P)	Proposed Mitigation Measures	Subcomponent	Significance	Magnitude	Geographic Extent	Duration	Frequency	Reversibility	Context	Likelihood	Level of Confidence
Community Well-Being	Change in Food Security	All Activities (C, O, D)	• Limit Project footprint and Project Area • Reclamation measures (refer to RCP) • Transport measures • Blasting measures (refer to EMP) • Management of ML/ARD (refer to ML/ARDMP) • People, employees, contractors and onsite policies • Public access management (refer to PAMP) • Dust suppression and air emissions (refer to AQMP) • Subsistence Food Management Plan (refer to RCP) • Community Engagement Programs (refer to SEMP) • Spill prevention and response (refer to FMSCP and MERP) • Management of hazardous materials and wildlife attractants (refer to FMSCP, WMPRE, and WMP)		NS	M	RSA	LT	CF	PR	M	L	L
Community Well-Being	Change in Cost of Living	All Activities (C, O)	• Housing measures • Education and training support (refer to SEMP) • Health and Wellness Program (refer to SEMP) • Housing and Accommodation Program (refer to SEMP) • Procurement Program (refer to SEMP) • Health, Safety, and Human Resources Superintendent (refer to SEMP)		NS	L	LSA	LT	CF	FR	H	L	L
Community Well-Being	Change in Community Cohesion	All Activities (C, O, D)	• Health and Wellness Program (refer to SEMP) • Education and training support (refer to SEMP) • Procurement Program (refer to SEMP) • Community Engagement Programs (refer to SEMP) • Decommissioning and Reclamation, and Post closure Program (refer to SEMP)		NS	L	RSA	LT	CF	PR	M	L	L
Community Well-Being	Change in Mental Health	All Activities (C, O, D)	• Limit Project footprint and Project Area • Reclamation measures (refer to RCP) • Project component design • Blasting measures (refer to EMP) • Health and Wellness Program (refer to SEMP) • Education and training support (refer to SEMP) • Health and Wellness Program (refer to SEMP) • Procurement Program (refer to SEMP) • Community Engagement Programs (refer to SEMP) • Decommissioning and Reclamation, and Post closure Program (refer to SEMP)		NS	L	RSA	LT	CF	PR	M	L	L
Land and Resource Use	Change in Access	All Activities (C, O, D)	• Limit Project footprint and Project Area • Consultation with tenure holders • Compensation for affected commercial tenure holders • Indigenous consultation and engagement • Public access management. Refer to Public Access Management Plan (S13.0-C14) (PAMP) • Improvements to existing trail • Signage • Land use agreements		NS	M	LSA	MT	CF	PR	L	L	M
Land and Resource Use	Change in Sensory Disturbance	All Activities (C, O, D)	• Limit Project footprint and Project Area • Reclamation measures. Refer to Reclamation and Closure Plan (S13.0-C15) (RCP) • Transport measures • Project component design • Blasting measures. Refer to Explosives Management Plan (S13.0-C6) (EMP) • Coal processing measures • Consultation with tenure holders • Indigenous consultation and engagement		NS	M	LSA	LT	CF	PR	L	L	M

					Residual Effects Characterization								
Valued Component	Residual Adverse Effects	Contributing Activities within the Project Phases (C, O, D, P)	Proposed Mitigation Measures	Subcomponent	Significance	Magnitude	Geographic Extent	Duration	Frequency	Reversibility	Context	Likelihood	Level of Confidence
Land and Resource Use	Change in Quantity or Quality of Resources	All Activities (C, O, D)	- Limit Project footprint and Project Area - Reclamation measures (refer to RCP) - Transport measures - Seepage management measures - Water capture measures - Management of metal leaching/acid rock drainage (ML/ARD) - Public access management (refer to PAMP) - Improvements to existing trail - Consultation with tenure holders - Indigenous consultation and engagement		NS	M	LSA	LT	CF	PR	L	L	H
Visual Resources	Reduction in Visual Quality during Active Phases (Minesite)	All Activities (C, O, D)	- Limit Project footprint and Project Area - Reclamation measures (Refer to RCP) - Project component design - Revegetation of disturbed areas relevant to Visual Resources (Refer to VRMP) - Targeted vegetation screening (Refer to VRMP)		S	M	LSA	MT	CF	PR	M	L	H
Visual Resources	Reduction in Visual Quality during the Post-closure phase (Minesite)	All Activities (P)	- Limit Project footprint and Project Area - Reclamation measures (Refer to RCP) - Revegetation of disturbed areas (refer to VRMP) - Targeted vegetation screening (Refer to VRMP)		NS	L	LSA	MT	CF	MR	M	UL	H
Visual Resources	Reduction in Visual Quality (Rail Infrastructure)	All Activities (C, O, D)	- Limit Project footprint and Project Area - Targeted vegetation screening (Refer to VRMP)		NS	L	LSA	MT	CF	FR	M	L	H
Labour Market	Increase in Competition for Skilled Local and Regional Workforce	Provision of Project employment and income (C, O)	Socio-Economic Management Plan (S13.0-C17) (SEMP) - Procurement Program (Refer to SEMP) - Education and Training Support (Refer to SEMP) - Communications (Refer to SEMP)		NS	L	LSA, A/G	MT	IF	FR	L	L	M
Labour Market	Increase in Labour Cost	Provision of Project employment and income (C, O)	SEMP - Procurement Program (Refer to SEMP) - Education and Training Support (Refer to SEMP) - Communications (Refer to SEMP)		NS	L	LSA, A/G	MT	IF	FR	L	L	M
Labour Market	Barriers to Indigenous Employment and Participation in Project-Related Economic Benefits	Provision of Project employment and income (C, O)	In addition to the above, the following measures are applicable to this effect: - Health, Safety, and Human Resources Superintendent - Indigenous Cultural Awareness Induction (refer to SEMP)		NS	M	LSA, A/G	LT	CF	PR	M	L	M
Economic Development	Decrease in Economic Diversity	Provision of Project employment and procurement opportunities (C, O)	Enhance business diversity		NS	L	RSA	LT	CF	FR	L	L	M
Economic Development	Change in the Capacity of Local or Regional Businesses to Supply Goods or Services	Provision of Project employment and procurement opportunities (C, O)	- Enhance local and regional benefits including employment - Procurement Program (See Socio Economic Management Plan (S13.0-C17) (SEMP))		NS	M	RSA	LT	CF	PR	M	L	M
Economic Development	Decrease in Local or Regional Tourism	Visual and environmental disturbances of Project activities (C, O, D)	- Limit Project footprint and Project Area - Project component design - Blasting measures. See Explosive Management Plan (S13.0-C6) (EMP) - Mitigation measures to reduce effects of the Project on land and resource use to preserve natural resources are described in S6.0-C4 Land and Resource Use VC. - Mitigation measures to enhance Visual resources of the Project are provided in S6.0-C2 Visual Resources VC. - Mitigation measures to reduce noise, vibrations, and dust, and improve air quality around the Minesite are provided in the S4.0-C1 Atmospheric Environment VC		NS	L	LSA	LT	CF	PR	L	L	M
Economic Development	Decrease in Economic Activity During the Decommissioning and Reclamation Phase	Provision of Project employment and procurement opportunities (D)	- Procurement Program (SEMP) - Decommissioning and Reclamation, and Post-closure Program (see SEMP)		NS	L	RSA	MT	CF	FR	M	L	M

Enclosure 3

TENAS PROJECT ENVIRONMENTAL ASSESSMENT—TELKWA MINING’S RESPONSES TO THE OFFICE OF THE WET’SUWET’EN’S COMMENTS PROVIDED IN 28 FEBRUARY 2025 LETTER WITH THE SUBJECT “OFFICE OF THE WET’SUWET’EN RESPONSE TO TELKWA MINING LIMITED’S NOVEMBER 28, 2024, LETTER RE: IR STATUS”; 12 MARCH 2025 LETTER WITH THE SUBJECT “INFORMATION REQUESTS REGARDING IMPACTS TO CARIBOU AND AQUATIC RESOURCES FOR THE TENAS COAL PROJECT”; AND 15 MAY 2025 EMAIL WITH THE SUBJECT “SECTION 25 IR RESPONSE – OW REVIEW”

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-001	521	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C)1	1. Any positive effects to Indigenous interests or Indigenous nations that are anticipated as a result of (see below)	This will require that the Proponent: a) Provide all the IR-related documents for review; b) Provide more detailed information about positive effects the Proponent proposes to benefit the Wet'suwet'en; c) Consider information provided by OW and the Houses regarding positive effects; d) Consider forthcoming information from OW and the Houses aimed at determining whether TML has adequately identified and addressed negative effects. This will include reviewing relevant monitoring, mitigation, and management plans. It is possible for potentially negative socio-economic effects to be turned into positive effects with appropriate planning, for example, funding into socio-economic programs to offset potential risks from the project. As an important administrative note, Telkwa Mining Limited (TML) has not referenced the reports they produced in response to each IR set out in the EAO's Transition Order. Can TML please correct this throughout this table and any other IR-related documents to ensure clarity and accessibility in this process?	Telkwa Mining acknowledges the comment. a) All documents related to IRs have been submitted to the EAO, which has shared them with the Technical Advisory Committee and has posted them online to the EAO Project Information Centre. Please refer to Attachments OW-001-1, OW-001-2 and OW-001-3. b) The positive effects of the Project are assessed in Chapters 5.1, Labour Market, and 5.2, Economic Development of the EAC Application (please refer to Attachments OW-001-1 and OW-001-2). In consideration of this information, the Environmental Assessment Transition Order Supplemental Report, prepared in February 2025, provides additional information on potential positive effects, including those to Indigenous groups. No additional assessment of the positive effects on the Wet'suwet'en has been conducted to date (please refer to Attachment OW-001-3) Telkwa Mining recognizes that while Telkwa Mining is specifically targeting employment opportunities for individuals from the Wet'suwet'en, no specific commitments or agreements have been signed to date with the OW and the Houses to define the size of the potential benefits. However, Telkwa Mining is targeting approximately 15% of the overall workforce to have a Wet'suwet'en background. c) No information has been provided by the OW and the Houses regarding the positive effects. Telkwa Mining is looking forward to reviewing the RIA, CUS, and Wellbeing Study once they are available as well as considering any additional information

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					provided by the OW. d) Telkwa Mining will consider any forthcoming information from the OW and the Houses. Telkwa Mining recognizes that funding for socioeconomic programs, or other measures to offset the potential negative effects or risks from the Project, would be considered as a mitigation measure. Telkwa Mining is committed to working with the Wet'suwet'en to identify potential socioeconomic programs and other measures to offset potential negative effects or risks from the Project. Telkwa Mining clarifies that page ii of the Environmental Assessment Transition Order Supplemental Report, prepared in February 2025 (Attachment OW-001-03), lists the considered VCs that were assessed as part of the EAC Application for the Project. These included the following: - Atmospheric Environment (Chapter 4.1) - Terrain and Soils (Chapter 4.2) - Surface Water (Chapter 4.3) - Groundwater (Chapter 4.4) - Aquatic Resources (Chapter 4.5) - Fish and Fish Habitat (Chapter 4.6) - Vegetation (Chapter 4.7) - Wildlife (Chapter 4.8) - Avian Species (Chapter 4.9) - Labour Market (Chapter 5.1) - Economic Development (Chapter 5.2) - Demographics (Chapter 6.1)

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					- Visual Resources (Chapter 6.2) - Infrastructure and Services (Chapter 6.3) - Land and Resource Use (Chapter 6.4) - Community Well-being (Chapter 6.5) - Heritage Resources (Chapter 7.1) - Human Health (Chapter 8.1) - Wet'suwet'en Rights and Interests (Section 11.0) As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to any positive and/or negative effects to Indigenous interests or Indigenous Nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-002	New	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C)1	1. Any positive effects to Indigenous interests or Indigenous nations that are anticipated as a result of	N/A - comment only	Telkwa Mining acknowledges the comment.
OW-003	New	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C)1	1. Any positive effects to Indigenous interests or Indigenous nations that are anticipated as a result of	N/A - comment only	Telkwa Mining acknowledges the comment.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-004	521	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C)2	1. The positive and negative indirect effects of the Project, including a. Long-term trends (e.g., changing environment, cumulative impacts of development, employment, and technology) and market fluctuations. b. Anticipated positive effects, any uncertainties related to those effects, how those effects will be monitored and, in the event those effects prove to be negative, in whole or in part, how the negative effects will be adaptively managed, mitigated, and in the case of impacts to Indigenous interests, accommodated.	This will require that the Proponent: a) Provide all the IR-related documents for review; b) Provide further information as requested by OW in forthcoming reviews of TML's supplemental material to assess the positive and negative indirect effects from the Project; c) Consider forthcoming information from OW and the House Groups regarding whether TML has adequately monitored, mitigated, and managed these effects.	Telkwa Mining acknowledges the comment. a) All documents related to IRs have been submitted to the EAO. The EAO has shared them with the Technical Advisory Committee and has posted them online via the EAO Project Information Centre. The previous tracking tables for IRs notes any corresponding documents. b) Telkwa Mining has responded to the additional requests from the OW in this tracking table. c) Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs the ongoing mitigation and monitoring planning for the Project.
OW-005	100, 102	Tenas Project Order Under Section 78(7) dated Dec 16,	3. Disproportionate effects on distinct human populations, including populations identified by gender, including: a. The		Telkwa Mining acknowledges the comment. Response to OW letters of 28 February and 12 March 2025 and May 15, 2022 are provided in Attachment OW-005-1, Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-2), and Revised Tenas

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		2022. Schedule A (C)3 (a-c)	Proponent’s efforts to engage human populations in culturally appropriate ways, including groups identified by gender, age, race, or other factors considered relevant by the community. b. A description of how the Proponent’s engagement was designed to support the collection of information needed to complete the Gender Based Analysis Plus (GBA+) as described in the EAO’s Human and Community Well-being: Guidelines for Assessing Social, Economic, Cultural and Health Effects in Environmental Assessments in B.C. c. The Project’s impacts on distinct populations, including Indigenous.		Project Environmental Assessment Transition Order: Current and Future Generations Analysis Report (Attachment OW-005-3). Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP (Attachment OW-008-1). Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Project Environmental Assessment Certificate. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-006	100, 102	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C)3 (d-f)	d. A description of how input from Indigenous nations, the public, and local governments was incorporated into the analysis and conclusions set out in the Application about both positive and negative effects and how the proponent's plans for the Project have changed as a result. e. The measures to be taken to address uncertainty in conclusions about effects of the Project on distinct human populations. f. The economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.	To resolve this IR, the Proponent should provide all relevant documentation and commit to further incorporating forthcoming information from engagement with OW and the results from OW studies (WWS, RIA, CUS), to: •Ensure information from Wet'suwet'en was adequately incorporated into the analysis and conclusions set out in the Application about both positive and negative effects and how the Proponent's plans for the Project have changed as a result. •Identify and address uncertainty in conclusions about effects of the Project on distinct human populations. •Accurately identify economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.	Telkwa Mining acknowledges the comment. Please refer to the response to comment ID OW-005.
OW-007	41	Tenas Project Order Under Section 78(7)	4. The Project's effects on current and future generations, including: a.	To resolve this IR, the Proponent should provide all relevant documentation and ensure that: •Wet'suwet'en perspectives and concerns are	Telkwa Mining acknowledges the comment. Please refer to the response to comment ID OW-005.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		dated Dec 16, 2022. Schedule A (C)4	The Project’s positive or negative effects on environmental, economic, social, cultural and health valued components (VCs) and Indigenous interests, as those effects impact both current and future generations. b. A description of how input from the public and Indigenous Nations related to effects on current and future generations was incorporated into the Application and how the Proponent’s plans for the Project has changed as a result. c. Measures that would more equitably distribute positive and negative effects of the Project over time (e.g., across generations). d. A description of how residual effects to VCs and Indigenous interests will affect both current and	integrated into the analysis of impacts to current and future generations; • Adequate and appropriate mitigation measures and responses are in place to address impacts to current and future Wet’suwet’en generations; • Economic benefits from the Project are evenly distributed across generations. Note that this information will also be considered in the RIA being conducted by OW and that this IR will remain open until OW is satisfied with how information from the RIA and OW’s review of TML documents is incorporated into Project monitoring, mitigation, and adaptive management plans.	

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			future generations. e. The type(s) of economic benefits that would be generated by the Project and how these benefits would be distributed, both within the population and over time.		
OW-008	NEW	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C) 5	5. A description of how the Project is consistent with any land-use plan of the government or an Indigenous nation.	To accomplish this, OW requires the Proponent to ensure: • That the protocols and directives related to the jurisdiction of the Houses are respected throughout the Yintah; • That this is reflected in the Proponent's Management Plans to OW's satisfaction; • That co-developed rehabilitation plans are identified before proceeding with project if the project is approved.	Telkwa Mining acknowledges the comment and, as requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans. Telkwa Mining has provided the necessary updated management plans that incorporate the Yintah Management Directives for review and comment by OW on their SYNC drive and is included in Attachment OW-008-1. Telkwa Mining has provided the draft reclamation and closure plan to the OW for review, and discussion on any potential improvements is in Attachment OW-008-2.
OW-009	274, 245, 239, 467	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (C) 6	6. The Project's greenhouse gas (GHG) emissions, including: a. How the Project's GHG emissions relate to the targets under the BC Climate Change	To resolve this IR, OW requires TML to ensure: • The Project's GHG emissions and impacts on local carbon sinks are in line with Wet'suwet'en priorities; • That proposed mitigation measures and/or	Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020)(Attachment OW-141-1). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project planning and development.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			Accountability Act2. b. The Project's potential positive or negative effects on carbon sinks, including forests.	emissions management plans are effective and account for Wet'suwet'en rights and interests.	In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addressed the outstanding items identified related to GHG, please see Attachment OW-141-3. Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the Rights Impact Assessment, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-010	New	Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (D)	d. Information requested from the Proponent by the EAO to better understand potential Project effects: 1. Information Requests: Caribou, issued by the EAO on October 6, 2022. (see Caribou tab)	To resolve these issues, OW requests that TML: •Provide all related documentation, including the updated information requested by OW in our responses to TML's filings related to caribou. (forthcoming). •Consider forthcoming information from OW to determine whether TML has adequately ensured that adverse impacts to caribou are adequately monitored and avoided where possible or, if avoidance is not possible, mitigated and/or managed in a way that is acceptable and appropriate for OW and the Houses.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026, OW-029, OW-030, and OW-031. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information into Project design, monitoring, mitigation, and adaptive management plans.
OW-011	175, 176, 307,350,353, 355, 356, 514	Tenas Project Order Under Section 78(7) dated Dec 16,	2. Information Requests: Water, issued by the EAO on November 23, 2022. (see Water tab)	To address this IR, the Proponent should: • Provide all the information requested in OW's forthcoming responses to TML's IR responses. • Consider forthcoming information from OW	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from Office of the Wet'suwet'en memo, SRK June 2025] Attachment OW-011-1.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		2022. Schedule A (D)		regarding how all concerns related to Project impacts on aquatic resources have been identified and characterized. Consider forthcoming information from OW regarding whether monitoring and mitigation plans are adequate to address adverse impacts to aquatic resources. Impacts to water may also be considered in the RIA being conducted by OW . This IR will remain open until OW is satisfied with how information from the RIA and the outcomes of OW's review of TML documents and engagement with TML on this issue are incorporated into Project monitoring, mitigation, and adaptive management plans.	Please see responses to comment IDs OW-038 through OW-050. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans.
OW-012	New	OW 1. Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (D).3.1	OW Information Requests Through direct engagement with Cas Yex and Kwen Bea Yex House Groups and in collaboration with OW, TML must: Collect cultural data and values specific to Cas Yex and Kwen Bea Yex house territories in the Tenas Project area to collaboratively determine and ground truth the	To resolve this IR, TML should: - Provide all information related to this IR, including any data or material related to engagement, effects assessment, or mitigation measures directly related to the House groups; - Consider and incorporate forthcoming information from OW on cultural impacts, including the findings of Wet'suwet'en studies and engagement outcomes, into the assessment process, project planning, and mitigation development.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			cultural values to be assessed in the review of impacts of the Tenas Project on Wet'suwet'en interests.		
OW-013	New	OW 2. Schedule A (D) 3.2	OW Information Requests Through direct engagement with Cas Yex and Kwen Bea Yex House Groups and in collaboration with OW, TML must: Collect cumulative effects data specific to Cas Yex and Kwen Bea Yex house territories in the Tenas Project area to collect and ground truth data, and to collaboratively determine the methodology for assessing cumulative effects in the review of impacts of the Tenas Project on Wet'suwet'en interests.	To resolve this IR, TML will need to: • Integrate the findings of the RIA and other studies or sources of information provided by OW and the House groups, including the outcomes of engagement with OW and the Houses on this subject into TML's assessment of Project impacts; and • Commit to further engagement aimed at determining whether TML has adequately addressed Project contributions to cumulative effects through impact avoidance, mitigation, and adaptive management.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-014	New	OW 3. Schedule A (D) 3.3	OW Information Requests Through direct engagement with Cas Yex and Kwen Bea Yex House Groups and	To resolve this IR, TML should: • Integrate the findings of the RIA and CUS, other sources of information, and the outcomes of engagement with OW and the Houses on this	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			in collaboration with OW, TML must: collect sociocultural data and values specific to Cas Yex and Kwen Bea Yex house territories in the Tenas Project area to collaboratively determine and ground truth the socio-cultural values to be assessed in the review of impacts of the Tenas Project on Wet'suwet'en interests.	subject into TML's assessment of Project impacts; and • Commit to further engagement aimed at determining whether TML has adequately addressed socio-cultural and wellbeing effects through impact avoidance, mitigation, and adaptive management.	
OW-015	New	Witset FN 1. Tenas Project Order Under Section 78(7) dated Dec 16, 2022. Schedule A (D) 4.1	Witset Information Requests Through direct engagement with Witset First Nation Members and in collaboration with Witset First Nation Chief and Council, TML must: Collect cultural data and values specific to Witset First Nation in the Tenas Project area to collaboratively determine and ground truth the cultural values to be	To resolve this IR and the associated concerns for Wet'suwet'en, TML should: • Integrate the findings of the RIA, WWS, CUS, other sources of information, and the outcomes of engagement on this subject into TML's assessment of Project impacts; and • Commit to further engagement aimed at collaboratively addressing socio-cultural effects through impact avoidance, mitigation, and adaptive management.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			assessed in the review of impacts of the Tenas Project on Witset First Nation's interests.		
OW-016	New	Witset FN 2. Schedule A (D) 4.2	Witset Information Requests Through direct engagement with Witset First Nation Members and in collaboration with Witset First Nation Chief and Council, TML must: Collect cumulative effects data specific to Witset First Nation in the Tenas Project area to collect and ground truth data, and to collaboratively determine the methodology for assessing cumulative effects in the review of impacts of the Tenas Project on Witset First Nation's interests.	Same as above	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans. Furthermore, Telkwa Mining will discuss appropriate incorporation of result of studies completed by and engagement with Witset First Nation into Project design, monitoring, mitigation, and adaptive management plans.
OW-017	New	Witset FN 3. Schedule A (D) 4.3	Witset Information Requests Through direct engagement	Same as above	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			with Witset First Nation Members and in collaboration with Witset First Nation Chief and Council, TML must: Collect socio-economic data and values specific to Witset First Nation in the Tenas Project area to collaboratively determine and ground truth the socio-economic values to be assessed in the review of impacts of the Tenas Project on Witset First Nation's interests.		design, monitoring, mitigation, and adaptive management plans. Furthermore, Telkwa Mining will discuss appropriate incorporation of result of studies completed by and engagement with Witset First Nation into Project design, monitoring, mitigation, and adaptive management plans.
OW-018	New	Witset FN 4. Schedule A (D) 4.4	Witset Information Requests Through direct engagement with Witset First Nation Members and in collaboration with Witset First Nation Chief and Council, TML must: Commit to sharing all project information with Witset First Nation, including TML's proposed	Same as above	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans. Furthermore, Telkwa Mining will discuss appropriate incorporation of result of studies completed by and engagement with Witset First Nation into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			management, avoidance, mitigation, and accommodation measures based on information provided by Witset throughout the EA and regulatory process.		
OW-019	New	Witset FN 5. Schedule A (D) 4.5	Witset Information Requests Through direct engagement with Witset First Nation Members and in collaboration with Witset First Nation Chief and Council, TML must: Conduct an assessment of Tenas Project impacts on cultural and socio-economic values and cumulative effects specific to Witset First Nation to inform the assessment of impacts on Wet'suwet'en Nation.	Same as above	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans. Furthermore, Telkwa Mining will discuss appropriate incorporation of result of studies completed by and engagement with Witset First Nation into Project design, monitoring, mitigation, and adaptive management plans.
OW-020.1	NEW		Any other outstanding issues with the Application that have been identified by Technical Advisory	OW requires TML to accurately identify and address impacts to the following values: •Moose: Concerns about moose mortality along rail lines and outdated population data. Future survey	Telkwa Mining acknowledges this multi-part request regarding moose, furbearers, and associated wildlife values. The following response is provided in three parts: (1) Moose mortality along rail lines, (2) Moose population data, and (3) Furbearers and other

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			Committee (TAC) reviewers or Indigenous nations.	updates needed, determined by BC Wildlife Biologists. •Other furbearing animals, including Fisher, Marten, Lynx, Coyote, Ermine, Amphibians, Water birds, Bats: Concerns about measures to address habitat connectivity.	identified species. 1) Moose mortality along rail lines The OW previously raised concerns about moose mortality, which were addressed in the Application. During AIR development (May 20, 2020), OW requested CN mortality data and studies from the Moose Mortality Working Group. Telkwa Mining committed to include a moose mortality analysis, reflected in the final AIR. The effects assessment estimates increased collision risk from added railcars and incorporates three Moose Mortality Working Group studies provided by FLNRORD (Heidi Schindler) to the Working Group. Key sections include the following in Attachment OW-020_1-1: • Wildlife chapter: 5.2.5.2, 5.4.5.2, 5.4.5.2.1, 5.4.5.2.3 • Wildlife chapter, Cumulative Effects: 6.3.4.2 2) Moose population data Telkwa Mining used the best available data (1983–2018 survey records) for the effects assessment in the EAC Application (see Attachment OW-020_1-1; Sections 4.2.4.1 and 5.4.5.2.1). Since submission, the Province completed a new moose survey in 2023 with results estimating 5,722 moose (±1,053; 90% CI) in a 13,256 km² study area that included the Tenas Project. This follows the current trend in decreased moose population as reported in the wildlife chapter and this population estimate is consistent with the conclusions provided on moose in the EAC. Telkwa Mining will continue to revisit this aspect as additional population estimates are provided by the province in the future.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Should monitoring from the Project demonstrate potential for adverse interaction between moose and the trains for the Project, Telkwa Mining will recommend additional mitigations to CN such as decreasing the speed of the train near the Project. 3) Furbearing animals, amphibian, water birds and bats, habitat connectivity Species identified by OW were considered during the Valued Component (VC) selection process and development of the Application Information Requirements (AIR). Feedback received during the AIR review led to the inclusion of fisher alongside marten and wolverine in the Furbearers Subcomponent of the Wildlife VC, with species movement assessed to address habitat connectivity. Lynx and coyote were considered but not carried forward due to low potential for adverse interaction, as outlined in the Telkwa VC Scoping Document (Sept 18, 2019). Water birds are included under the Avian VC (Section 4.2.2.2), amphibians are represented by western toad (Sections 5.2.7 and 5.4.7), and bats are included as a subcomponent (Sections 5.2.6 and 5.4.6).
OW-020.2	NEW		Any other outstanding issues with the Application that have been identified by Technical Advisory Committee (TAC) reviewers or Indigenous nations.	OW requires TML to accurately identify and address impacts to the following values: •Culturally important plant species, including those used for food (e.g., huckleberries, blueberries) and medicinal purposes (e.g., Devil's club, stinging nettle). Concerns about missing information on uncommon ecosystems, medicinal/food plants,	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-020_1-1 provides a response related to moose mortality along train lines, habitat connectivity, potential missing information related to plants and wildlife identified by the OW. Telkwa Mining acknowledges the comment. The assessment of culturally important plant species provided in the Tenas Project

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				and rare plant communities essential for Wet'suwet'en foraging, shelter, and sustenance. •Wet'suwet'en culture and rights, including plant use and wellness: Wet'suwet'en to determine if cultural concerns are addressed adequately.	BC EAC Section 4.2.4 in Attachment OW-020_2-1 focused on twelve species used for food and medicine that were identified from previous baseline documents and assessments. The assessment was not intended to include a comprehensive list of culturally important plant species used by the Wet'suwet'en, but looked at a subset of species that could collectively represent effects on culturally important plant species as a group. Telkwa Mining acknowledges that there are many more plant species that are currently, or have previously been, used by the Wet'suwet'en. The Proponent remains committed to continued engagement during Project planning and development to ensure values important to OW and House members are considered through project design, mitigation, and monitoring. As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the Rights Impact Assessment, CUS, and Wellbeing Study (including culturally important plant species, as relevant) into Project design, monitoring, mitigation, and adaptive management plans. The OW is responsible for ensuring that Wet'suwet'en cultural concerns are addressed adequately, if any issues are identified by the Wet'suwet'en peoples on this matter then this needs to be resolved by the OW.
OW-020.3	NEW		Any other outstanding issues with the Application that have been identified by	OW requires TML to accurately identify and address impacts to the following values: •Accidents and malfunctions: Concerns about	Telkwa Mining acknowledges the comment. Please refer to EAO EAC Application, S9.0 Accidents and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			Technical Advisory Committee (TAC) reviewers or Indigenous nations.	potential for environmental damage due to accidents and malfunctions and what additional safeguards are required.	Malfunctions, May 2022, Version 1.0. S9.0, which addresses potential impacts to VCs from reasonable worst-case accidents and malfunctions. Any potential environmental damage is noted for land, air, and water potentially impacting the surrounding environment; this is inclusive of OW impacts. Mitigation measures to safeguard impacts are detailed in each risk assessment scenario described in S9.0 (Attachment OW-020_3-1). Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-021	NEW		"Open" responses from 2023 11 20 - Tenas - WG Issues Tracking Table_10 April 2024. (see ITT Open tab)	N/A - comment only	Telkwa Mining acknowledges the comment.
OW-022	NEW		Tenas Project Information Requests: Fish and Fish Habitat - NEW - Conduct ground-based surveys for spawning activity or evidence of spawning activity of steelhead/rainbow trout, with a focus on smaller	To resolve this IR, TML should: •Provide all documentation and requested information related to fish spawning; •Consider forthcoming information from OW aimed at determining whether TML has adequately identified and characterized all impacts related to Steelhead spawning, including the identification of waterbodies of importance to the Houses; and •Consider forthcoming information from OW aimed	All information has been provided related to fish spawning, fish, and fish habitat to the OW. As requested by the OW, Telkwa Mining will consider forthcoming information on Steelhead spawning habitat from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			creeks that overlap the local study area. The objective is to identify any habitat use in the project area by adult steelhead, including migration and spawning. The spatial extent of surveys should extend from a stream's confluence with the Telkwa River or Goathorn Creek upstream to the end of fish use. Methods to employ can include spawning surveys, redd surveys, fry emergence surveys, DNA, biometrics, habitat suitability assessments, and any other methods deemed appropriate and informative.	at determining whether TML has adequately addressed any adverse impacts to fish spawning in a way that is acceptable and appropriate for OW and the Houses.	Since the information is forthcoming, it will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the development of the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-023	416	Appendix A Sec. 3.1.2, Map 4 pp. 12 Appendix B -	Buffers: Consistent with other recent EA processes, ECCC maintains its recommendation that the effects assessment for sensory disturbance of	A) Please provide an updated Map 4 from Appendix A once the blasting re-assessment (see comments on 491 ITT IR (ECCC, WLRS)) is complete.	Telkwa Mining acknowledges the comment, and notes that the blasting noise assessment is not dependent on the location of the receptor but rather, the location of blasting. Please refer to Attachment OW-023-1 and Attachment OW-023-2. These attachments provide updated isopleth maps of maximum predicted noise levels in relation to the RSA-2 Core Habitat boundary based on Scenario 1, which considers a blasting

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Blasting Noise Assessment	specific mining projects, such as the Tenas Project, should consider an agreed-upon buffer (e.g., of at least 3km). The 500m buffer is appropriate in the context of assessing population-level dynamics at the scale of the herd range, not for assessing project-scale effects of this type. As such, the Proponent is encouraged to re-assess effects to caribou using an appropriate disturbance buffer and may need to re-evaluate the proposed mitigation measures so that they address the potential for effects, considering the larger buffer for sensory disturbance. LWRS agrees with ECCC and notes a more thorough assessment using the project footprint with scientifically defensible		location closest to the RSA-2 Core Habitat boundary at the beginning of mining activity. As illustrated by the figures, the predicted noise level propagation from blasting remains unchanged at a maximum distance of 2km to reach a level of 55 dBa. Please refer to Attachment OW-023-3 and Attachment OW-023-4. These attachments provide updated isopleth maps of maximum predicted noise levels in relation to the RSA-2 Core Habitat boundary based on Scenario 2, which considers blasting at pit floor as mining progresses. As illustrated by the figures, the predicted noise level propagation from blasting remains unchanged at a maximum distance of 2km to reach a level of 55 dBa. The 3 km buffer was based on where blasting would occur for the Project which does not change based on the receptor. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to the noise assessment into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			buffers (e.g., of at least 3 km) and agreed upon by LWRS must be conducted.		
OW-024	420	Appendix A Sec. 3.1.2, Map 4 pp. 12 Appendix B - Blasting Noise Assessment	Buffers: Current proposed disturbance buffering is not sufficient to account for impacts of the Project to caribou use, habitat loss, habitat abandonment or displacement, increased predation risk, and increased stress from permanent, transient, and sensory disturbances. Within the scope of the Project, inactive resource roads should be buffered by at least 500 m, active resource roads should be buffered by at least 1.8 kilometres (km), and active mine sites should be buffered by at least 3+ km, all with appropriate rationale provided for determination of zone-of-influence (ZOI) for each	A) Please provide an updated Map 4 from Appendix A once the blasting re-assessment (see comments on 491 ITT IR (ECCC, WLRS)) is complete.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-023 above.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			activity, disturbance, and status. The above guidelines are the minimum and TCL must work with ECCC and LWRS to develop agreed upon buffers for the additional assessment		
OW-025	NEW	Appendix A Sec. 3.1.2, Map 4 pp. 12 Appendix B - Blasting Noise Assessment	Buffers: Current proposed disturbance buffering is not sufficient to account for impacts of the Project to caribou use, habitat loss, habitat abandonment or displacement, increased predation risk, and increased stress from permanent, transient, and sensory disturbances. Within the scope of the Project, inactive resource roads should be buffered by at least 500 m, active resource roads should be buffered by at least 1.8 kilometres (km), and active mine sites should be	A) Please provide an updated Map 4 from Appendix A once the blasting re-assessment (see comments on 491 ITT IR (ECCC, WLRS)) is complete.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-023 above

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			buffered by at least 3+ km, all with appropriate rationale provided for determination of zone-of-influence (ZOI) for each activity, disturbance, and status. The above guidelines are the minimum and TCL must work with ECCC and LWRS to develop agreed upon buffers for the additional assessment.		
OW-026	418	Appendix A, Section 3.1.1 (PDF p. 14) Map 3 (PDF p. 13) Table 2 (PDF p. 18); Section 3.1.3 (PDF p. 17)	Effects assessment and critical habitat Based on the location of the Project within the Telkwa caribou range, the Application does not provide sufficient rationale to support the determination that the Project and its associated disturbances will result in no direct or indirect habitat loss.	A) Please provide documentation of the additional communications that occurred between TML and ECCC / WLRS that lead to the current definitions that were used by TML in their response to the Information Request, as this is unclear to other parties. B1) Please provide an updated direct and indirect effects assessment that includes impacts to all of the Critical Habitat area (RSA-1), including impacts to moderate and high suitability low elevation winter habitat AND Type 1 matrix habitats. B2) Please provide a clear rationale as to how the direct and indirect effects of the Project will not worsen existing conditions in disturbed areas for	Telkwa Mining acknowledges the comment. A) As mentioned during Telkwa Mining's engagement with OW (January 28, 2025), and in the subsequent written responses to OW's questions (February 19, 2025), Telkwa Mining had not initiated discussions on this (or any) IR response with BC WLRS or ECCC. Telkwa Mining's objective was to first receive feedback from OW, adjust IR responses based on that feedback, and then to present a refined response for all IR topics to BC WLRS and ECCC. Since then, EAO and Telkwa Mining have invited OW and other participating Indigenous nations to all subsequent discussion with BC WLRS and ECCC. B1) Please see Section 5.2.3.3 and Section 5.3 of Appendix 1 (Attachment OW-026-1). Loss of caribou biophysical attributes due to the Project was assessed by estimating the distribution and abundance of currently suitable, or potentially suitable (i.e.,

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			TCL must work with ECCC and LWRS to appropriately characterize the adverse effects of the Project, both direct and indirect, given revised disturbance buffering outlined above, and given the context that the total existing disturbance in the Telkwa herd range already exceeds both federal disturbance thresholds (i.e., minimal disturbance of high elevation winter and/or summer ranges, and at least 65% undisturbed habitat for low elevation winter range and Type 1 matrix categories of critical habitat). Working with ECCC and LWRS will enable mutual understanding of the varying definitions of direct and indirect effects.	the Telkwa Caribou Herd and explain how the loss of potential natural regeneration of disturbed areas <40 years old by 2050 is being accounted for. B3) Please provide an updated version of the direct and indirect effects assessment that includes scenarios where: -The total disturbance is calculated from existing, permanent disturbances in the Critical Habitat area. All burns and cut blocks are assumed to eventually provide habitat and are not included in the total disturbance; and -The Project's total disturbance is added to the existing above disturbance. B4) As Map 3 clearly shows there is moderate and high suitability low elevation habitat in close proximity to the Project footprint and this area will be impacted by indirect effects, please provide a calculation of the area of these habitats that will be indirectly affected regardless of current caribou presence/absence. As well, please provide details of the communications between TML and WLRS that confirms that their concerns related to the use of available telemetry data from the Telkwa Caribou Herd to determine a lack of habitat use have been	capable), low-elevation winter range habitat within the Project Footprint. The previous assessment excluded Type 1 matrix because there is no evidence that those habitats are currently being used by caribou or providing movement habitat to access low-elevation winter range habitat. This could change in future if predator-prey conditions improve; however, this represents a speculative future scenario. While not a standard practice for estimating project effects in an Environmental Assessment context, Telkwa Mining has nevertheless revised their effects assessment to address OW's concerns. The revised effects assessment quantifies the Project's direct and indirect effects on high elevation Core Range, low-elevation Capable Winter Range (i.e., biophysical attributes), and low-elevation Caribou Movement Habitat (Type 1 matrix) under "optimal habitat" baseline conditions. B2) Please see Section 5.3 of Appendix 1 (Attachment OW-026-1). Telkwa Mining's revised effects assessment considers Project effects on all high elevation and low elevation habitats in relation to a revised baseline that now assumes regeneration of all natural (e.g., fire) and forestry (i.e., cutblocks) disturbances, and reclamation of all tertiary and quaternary roads and trails. Certain recreational trails that are unlikely to be reclaimed were retained as permanent disturbances (e.g., Hunter's Basin, Hankin Plateau, Webster Lake, and Star Basin trails). This treatment of non-permanent habitat disturbances maximized the potential effects of the Project and generates an overly conservative effects assessment because it assumes no future

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			TCL must identify adverse effects (loss, alteration, disruption) to each critical habitat type as identified in the Recovery Strategy using the most current critical habitat mapping and using scientifically relevant buffers regardless of current habitat disturbance status. Based on the location of the Project within the Telkwa caribou range, the Application does not provide sufficient rationale to support the determination that the Project and its associated disturbances will result in no direct or indirect habitat loss.	addressed. C) Please provide an updated version of the effects assessment that includes the area of direct and indirect effects within RSA-1 and RSA-2-Core regardless of the current habitat disturbance status.	habitat disturbance other than the Project. Any indirect effects of the Project are considered to result in a complete loss of caribou habitat. This approach, while overly conservative (i.e., sensory disturbance reduces the probability of use but does not remove habitat), accounts for the worsening or additive effects of the Project under the “optimal habitat” baseline conditions scenario. B3) Please refer to the revised effects assessment in Section 5.3 of Appendix 1 (Attachment OW-026-1). B4) Please refer to Section 5.3 of Appendix 1 (Attachment OW-026-1). Indirect effects to moderate and high suitability caribou biophysical attributes (i.e., low-elevation Capable Winter Range as described above) were already calculated in the previous assessment. However, updated calculations of direct and indirect effects to this habitat are provided in the revised effects assessment. As a point of clarification, telemetry data were not used to inform the Project’s direct and indirect effects assessment calculations. Instead, caribou habitat capability was used to inform calculations of direct and indirect effects, even though there is limited evidence of caribou using these areas. As mentioned during the engagement with OW (January 28, 2025), Telkwa Mining had not commenced discussions on this IR

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					response with ECCC and BC WLRS. Telkwa Mining’s objective was to first receive feedback from OW, adjust IR responses based on that feedback, and then to present a refined response for all IR topics to BC WLRS and ECCC. Since then, EAO and Telkwa Mining has invited OW and other participating Indigenous Nations to all subsequent discussion with BC WLRS and ECCC. C) Please refer to the revised effects assessment in Section 5.3 of Appendix 1 (Attachment OW-026-1). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to caribou into Project design, monitoring, mitigation, and adaptive management plans.
OW-027	412	Appendix A, Section 3.1.1 (PDF p. 14) Map 3 (PDF p. 13) Table 2 (PDF p. 18); Section 3.1.3 (PDF p. 17)	Effects assessment and critical habitat ECCC recommends that the text in Paragraph 2 be revised to include the following edits: “The Recovery Strategy (Environment Canada 2014) indicates that, for the Northern Group, which includes the Telkwa Caribou Herd, minimal	Please provide details of where ECCC's content edits were actioned by TML.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response. The referenced ITT IR 412 (OW-027) has been removed from the Caribou IR and assigned to the Effects Assessment Phase by the EAO. ITT IR 407 has also been allocated to the Effects Assessment Phase by the EAO.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			disturbance of high elevation winter and/or summer ranges (which is applicable to CRSA2 Core), and at least 65% undisturbed habitat for low elevation winter range and Type 1 matrix range is considered necessary to achieve recovery. The amount of disturbed habitat (using the actual footprint and a 500-m buffer around the existing human disturbance, plus unbuffered natural disturbances [e.g., forest fires]), as defined by the Recovery Strategy (Environment Canada 2014), currently exceeds both of these 35% disturbance thresholds in most Caribou study areas, except for the CRSA2 Core (Table 4.2-4). Note that because the WLSA, CRSA1, and CRSA2 Matrix include		

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			both high- elevation and low elevation areas, these figures underestimate the total percent disturbance for LE only when comparing to the maximum 35% threshold. Regardless, this Low elevation threshold has been exceeded.” Where caribou habitat is below the management thresholds outlined in the Recovery Strategy, as described above, ECCC recommends additional mitigation measures to offset the residual and cumulative effects of the Project on the Telkwa caribou herd. Mitigation measures should be developed: • with appropriate buffers; • using the most current draft of caribou critical habitat mapping; • in consideration of the		

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			high risk to caribou given previous impacts to the landscape and the small population size of the Telkwa herd; and • following the mitigation hierarchy of avoid, reduce, and compensate/ offset. ECCC recommends that offsetting mitigation measures follow the guidance outlined in the Operational Framework for the Use of Conservation Allowances. Reference Environment Canada. 2012. Operational Framework for Use of Conservation Allowances. Environment Canada, Ottawa, ON. 13pp. Available at: https://publications.gc.ca/collections/collection_2012/ec/En14-77-2012-eng.pdf		

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-028	NEW	Appendix A (General)	Effects assessment and critical habitat TCL must work with ECCC and LWRS to appropriately characterize the adverse effects of the Project, both direct and indirect, given revised disturbance buffering outlined above, and given the context that the total existing disturbance in the Telkwa herd range already exceeds both federal disturbance thresholds (i.e., minimal disturbance of high elevation winter and/or summer ranges, and at least 65% undisturbed habitat for low elevation winter range and Type 1 matrix categories of critical habitat). Working with ECCC and LWRS will enable mutual understanding of the varying definitions of direct and indirect effects.	Please provide documentation of the additional communications that occurred between TML and ECCC / WLRS that lead to the current characterization of the adverse effects of the Project that was used by TML in their response to the Information Request, as this is unclear to other parties.	Telkwa Mining acknowledges the comment. As mentioned during Telkwa Mining’s engagement with the OW (January 28, 2025), and the subsequent written responses to the OW’s questions (February 19, 2025), Telkwa Mining has not initiated discussions on this (or any) IR response with BC WLRS or ECCC. Telkwa Mining’s objective is to first receive feedback from OW, adjust IR responses based on that feedback, then present a refined response for all IR topics to BC WLRS and ECCC. Telkwa Mining will invite OW and other participating nations to all subsequent discussion with BC WLRS and ECCC. Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			TCL must identify adverse effects (loss, alteration, disruption) to each critical habitat type as identified in the Recovery Strategy using the most current critical habitat mapping and using scientifically relevant buffers regardless of current habitat disturbance status.		
OW-029	NEW	Appendix A (General); Appendix C (General); Appendix A (Section 4.7 PDF p. 34-35)	Offsetting for direct and indirect effects TCL must work with ECCC and LWRS to develop an adequate assessment following the mitigation hierarchy, including appropriate mitigation and offsetting measures (e.g., securement, habitat restoration) at agreed upon ratios 1 2. Multiple ratios may apply depending on the specifics of the impacted and offset habitat types and locations.	A) Please provide documentation of the additional communications that occurred between TML and ECCC / WLRS that led to the current offsetting activities proposed by TML in their response to the Information Request, as this is unclear to other parties. B) Please provide an updated direct and indirect effects assessment based on the above comments and an updated estimate of required offset areas based on this revised effects assessment. C1) Please provide a clear commitment to offset Project related direct and indirect effects on Telkwa caribou herd habitat based on a revised Project effects assessment (see above comments). C2) Please provide further details of the field-based assessments noted in Appendix C, including but	Telkwa Mining acknowledges the comment. A) As mentioned during Telkwa Mining's engagement with OW (January 28, 2025), and in the subsequent written responses to OW's questions (February 19, 2025), Telkwa Mining had not initiated discussions on this (or any) IR response with BC WLRS or ECCC. Telkwa Mining's objective was to first receive feedback from OW, adjust IR responses based on that feedback, and then to present a refined response for all IR topics to BC WLRS and ECCC. Since then, EAO and Telkwa Mining have invited OW and other participating Indigenous Nations to all subsequent discussion with BC WLRS and ECCC. B) Please refer to the revised effects assessment in Section 5.3 of Appendix 1 (Attachment OW-026-1). C) Please see responses to C1 through C3, below.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			Mitigation measures should be developed with scientifically defensible buffers using the most current draft of caribou critical habitat mapping, while considering the high risk to caribou given previous impacts to the landscape and the small population size of the Telkwa caribou herd, and follow the mitigation hierarchy of avoid, reduce, and compensate/offset. Offsets must be designed to deliver tangible, measurable, on-the-ground conservation outcomes for caribou that are clearly linked to the impacts predicted to remain after all other mitigation measures are applied, and result in net increase of caribou habitat, at agreed upon	not limited to: - The spatial extent of on the ground survey activities at each location; - The methods used to confirm / discount PEM / TEM mapping; and -The spatial extent of each PEM / TEM mapping polygon in which surveying was conducted. C3) Please commit to undertaking further assessments of PEM / TEM mapping, inclusive of areas not identified as moderate or high suitability habitat to confirm its absence of these features, to better understand where moderate/high suitability caribou habitat may actually be present or absent. TML should undertake further discussions with ECCC, WLRS, and Wet'suwet'en to 1) ensure that the proposed scale, extent, timing, and methods of this survey are appropriate and 2) discuss other opportunities for habitat offsetting in areas without advanced regeneration D) Please undertake further discussions with TML, ECCC, WLRS, and Wet'suwet'en to determine offsetting ratios that will be required for the Project. To inform these discussions, TML should provide further rationale and summary of possible offsetting ratios that could be used to offset Project effects. Given the current low population levels and highly disturbed landscape that the Telkwa caribou herd occupy, any further disturbance could have	Based on the work completed in September 2024, over 90% of the identified high elevation restoration offset targets were reviewed at a reconnaissance level and determined that undertaking restoration activities may cause more disturbance than allowing natural regeneration to occur on its own. Telkwa Mining reviewed the remaining 10% of high-elevation restoration candidates, with the participation of OW, during August 2025 fieldwork. The candidates surveyed in August 2025 were used to inform offsetting calculations. Further details are provided in Section 6.5 of Appendix 1 (Attachment OW-026-1). C1) Please refer to the revised effects assessment and habitat offsetting strategy in Section 5.3 and Section 6 of Appendix 1 (Attachment OW-026-1). Telkwa Mining is committed to offset Project-related direct and indirect effects on caribou habitat based on either item (B), above, or a table of effects that has been approved by regulatory bodies for the Tenas Project. C2) Please refer to Section 5.2.3.3 and Section 6.5 of Appendix 1 (Attachment OW-026-1). In addition to reconnaissance-level assessment of moderate/high suitability low elevation caribou habitat (September 2024), 66 (5.65-m radius) plots were assessed for site series and caribou habitat suitability and capability in the Project Footprint (August 2025). Based on these field observations, no adjustments were made to the TEM/PEM-

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			ratios. The temporal lag of measures needs to be clearly represented in the assessment of conservation outcomes.	increasingly dire consequences for the herd's continued existence and the proposed offsetting ratios must reflect this context. E) Please commit to providing all offsetting funds at the start of the Project, to ensure that the maximum effectiveness and benefit of offsetting activities on the Telkwa caribou herd are realized.	defined low-elevation capable winter range habitat. Recall from the Vegetation and Ecosystems Baseline Report (Appendix 4.7-A in the Project Application; Ardea Biological Consulting 2022) that the TEM occurred within the Vegetation Local Study Area (LSA; Project Footprint + 250–500 m buffer) and PEM mapping occurred in the Vegetation Regional Study Area (RSA; Project Footprint + 5 km buffer) and beyond, including the broader RSA-1 (Telkwa Caribou Herd Critical Habitat boundary). As part of the development of the TEM, 780 ecosystem plots were investigated from 1997–2019 and were used to characterize vegetation and ecosystem types (Table 3.2-2 in Appendix 4.7-A). At the mine site, 445 plots were completed; 371 of these plots were completed from 2017–2019. A detailed mapping accuracy assessment was completed for TEM polygons using the methods outlined in (Meidinger 2003). For more details related to the PEM/TEM, please refer to Appendix 4.7-A in the Project Application. C3) Telkwa Mining considers the TEM developed for the Project Footprint to be robust and adequately verified based on the extensive plot work and subsequent accuracy assessment. Telkwa Mining has no intention of conducting additional work to confirm the PEM outside the Project Footprint because this would have no impact on the Project effects assessment, and detailed ground reconnaissance would be a component of any habitat restoration projects considered in these areas.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Please refer to Section 5.2.3.3 of Appendix 1 (Attachment OW-026-1). Telkwa Mining completed field assessments, with the participation of an OW representative, of TEM/PEM-derived low-elevation capable winter range habitat and evidence of caribou use within the Project Footprint in August 2025. The fieldwork validated the use of the TEM/PEM approach, and identified limited evidence of caribou use within the Project Footprint. D) The offset ratios provided are Telkwa Mining’s suggestions and are intended for discussion. The final offset ratios for high elevation (core) and low elevation (caribou biophysical and Type 1 matrix) caribou habitat will depend on input from BC WLRS, ECCC, OW, and Wet’suwet’en house groups. Please also refer to the revised habitat offsetting strategy for updated offset ratios and corresponding rationales; see Section 6 of Appendix 1 (Attachment OW-026-1). E) Telkwa Mining will commit to a higher percentage of offsetting funds to be available at the start of the Project, however, some funds need to remain to conduct annual inspections, monitoring, and reporting activities by various groups. If need be, this annual amount can be over and above the offset amount calculated. Please also refer to the revised habitat offsetting strategy for updated offset ratios and the disbursement of funds; see Section 6 of Appendix 1 (Attachment OW-026-1). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the Rights Impact Assessment,

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-030	412		Offsetting for direct and indirect effects ECCC advises that SMC critical habitat is likely to be destroyed by the Project. In the event the Project is approved, ECCC's view is that mitigation measures, including offsetting, should be provided to address the Project's contribution to cumulative effects on the Telkwa herd. Offsetting provided should be commensurate with the risk to the Telkwa herd and its critical habitat, including the consideration of the low population number, and that the management thresholds for caribou critical habitat have already been exceeded. In addition, ECCC notes the	Please provide details of where ECCC's content edits were actioned by TML.	Telkwa Mining acknowledges the comment. Please see responses related to habitat offsetting in previous sections. Please also refer to the revised habitat offsetting strategy in Section 6 of Appendix 1 (Attachment OW-026-1). ITT IR 407 and red text in ITT IR 412 have been moved to the Effects Assessment stage by the BC EAO. Telkwa Mining suggests that OW discuss this item with the BC EAO and the technical working group. Note: there are several duplicated IR numbers (including IR 412) in the tracking table provided by BC EAO, which may be causing confusion. As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to caribou on Indigenous interests or Indigenous Nations into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			recommended edits are intended to correct inaccuracies in TCL's text (i.e., the 35% disturbance threshold does not apply to high elevation range). The ECCC review thoroughly lists the gaps and expectations. TCL did not adequately consider the comment from ECCC. The clarification on the issue of habitat type requires re-evaluation of the project impacts and subsequent assessment of adverse effects. LWRS comment on 407 also needs to be considered here.		
OW-031	417		Offsetting for direct and indirect effects TCL must work with ECCC and LWRS to develop an adequate assessment following the mitigation hierarchy, including	(See above comment regarding offsetting.)	Telkwa Mining acknowledges the comment. Please see responses related to habitat offsetting in previous sections. Please also refer to the revised habitat offsetting strategy in Section 6 of Appendix 1 (Attachment OW-026-1).

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			appropriate mitigation and offsetting measures (e.g., securement, habitat restoration) at agreed upon ratios. Multiple ratios may apply depending on the specifics of the impacted and offset habitat types and locations. LWRS agrees with ECCC comments and recommends the Proponent review the Environmental Mitigation Policy and provide an offsetting plan. Offsets must: 1) be designed to deliver tangible, measurable, on-the-ground conservation outcomes for caribou that are clearly linked to the impacts predicted to remain after all other mitigation measures are applied. 2) Result in no net loss of caribou habitat. ECCC advises that SMC		

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			critical habitat is likely to be destroyed by the Project. In the event the Project is approved, ECCC's view is that mitigation measures, including offsetting, should be provided to address the Project's contribution to cumulative effects on the Telkwa herd. Offsetting provided should be commensurate with the risk to the Telkwa herd and its critical habitat, including the consideration of the low population numbers and that the management thresholds for caribou critical habitat have already been exceeded.		
OW-032	491	Appendix B - Blasting Noise Assessment	Acoustic modeling and impacts (assessment of indirect effects) The current model is overly simplistic given values in the receiving environments. TCL must conduct acoustic	A) Please provide an updated Blasting Noise Assessment using: 1. The closest areas of BC's 2019 RSA-2-Core habitat as the discrete receptors and; 2. Modelled blasting sites chosen based on the closest potential location to the RSA-2-Core habitat.	Telkwa Mining acknowledges the comment. A) Please see Appendix A in Attachment OW-032-1. The attachments provide updated isopleth maps of maximum predicted noise levels in relation to the RSA-2 Core Habitat boundary based on Scenario 1, which considers a blasting location closest to the RSA-2 Core Habitat boundary at the beginning of mining activity. Attachment OW-032-1 also provides updated isopleth maps of maximum predicted noise levels in

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			modeling that considers terrain and atmospheric conditions to accurately assess the effects of blasting associated with pit development on caribou. This includes residential areas as well as caribou core habitat.	B) Please provide the following information regarding noise level exceedances: 1. Daytime noise levels: exceedance level at 2 km away, exceedance level at 1 km away, exceedance level at the edge of the Project footprint, and how often these levels will be exceeded (hourly, daily, weekly, etc.). Please provide all this information in table format. 2. Maximum noise levels: dB heard at closest edge of RSA-2-Core habitat, exceedance level at 2 km away, exceedance level at 1 km away, exceedance level at the edge of the project footprint, and how often these levels will be exceeded (hourly, daily, weekly, etc.). Please provide all this information in table format. 3. Nighttime noise levels: exceedance level at 2 km away, exceedance level at 1 km away, exceedance level at the edge of the project footprint, and how often these levels will be exceeded (hourly, daily, weekly, etc.). Please provide all this information in table format. C) Please incorporate the lower auditory threshold for caribou of 30 Hz into the Blasting Noise Assessment.	relation to the RSA-2 Core Habitat boundary based on Scenario 2, which considers blasting at pit floor as mining progresses. As illustrated by the figures, the maximum noise levels may exceed the target daytime noise level of 55 dBA and the caribou auditory threshold of 30 dBA up to 2 km from the blast initiation site. Responses to B1, 2B2, 2B3 and 3C are provided in Appendix A in Attachment OW-032-1. 2.B) 1. Daytime noise levels (55 dBA) and caribou auditory thresholds (30 dBA) are only exceeded up to 2 km away from the Project footprint. Daytime noise levels (55 dBA) and caribou auditory thresholds (30 dBA) are exceeded at the edge of the Project footprint. This is related to equipment operation during the Operation Phase, which could occur continuously. 2. B) 2. Maximum A-weighted noise levels are not predicted to exceed the target level of 55 dBA at 2 km away. Maximum A-weighted noise levels are predicted to exceed the target level of 55 dBA at the edge of the Project footprint and at 1 km away, encompassing a small area within the RSA-2 Core Habitat boundary. This is related to blasting, both at the upper benches of pit development, and as mining progresses, and could occur once a day throughout the Operation Phase, for a duration of approximately five minutes while the blast is detonated. Maximum linear-weighted noise levels are not predicted to exceed the target level of 120 dB within the RSA-2 Core Habitat boundary, 1 km away, or 2 km away. Maximum linear-weighted

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					noise levels are predicted to exceed the target level of 120 dB at the edge of the Project footprint, only when blasting at the upper benches of pit development, which could occur once a day at the beginning of the Operation Phase, for a duration of approximately five minutes while the blast is detonated. Blasting will be conducted in accordance with the Tenas YMD-Enhanced Explosives Management Plan (Provided in Attachment OW-008-1) in which Telkwa Mining has committed to waiting for large animals such as caribou to be clear of 700 m prior to blasting. 2. B) 3. Nighttime noise levels are not predicted to exceed the target level of 45 dBA at 2 km away. Nighttime noise levels are predicted to exceed the target level of 45 dBA at the edge of the Project footprint and only minimally (45.3 versus 45) at 1 km away. This is related to equipment operation during the Operation Phase, which could occur continuously. C) Blasting noise was modelled for the octave band with midband frequency of 31.5 Hz as this represents the lowest octave band considered by the CadnaA model and the ISO 9613-2 algorithms. This octave band includes frequencies from 22 Hz to 44 Hz, encompassing the 30 Hz threshold. Noise levels associated with 30 Hz would not be measurably different from modelled noise levels associated with the octave band with midband frequency of 31.5 Hz. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					the noise assessment to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-033	492	Appendix D - Information Requirement Response — Impact of Upgraded Recreational Access on the Telkwa Mountain Caribou Subpopulation	Recreational Access Construction of the bridge over Tenas Creek has significant potential to increase recreational access to the Telkwa mountains resulting in displacement of caribou from core habitat. This issue was pointed out to the proponent and discussed in pre-application meetings; however, I do not see mention of it in the application. EA Information Requirement: Include a description of increased access to the Telkwa mountains resulting from mine development, recommend mitigation and assess impacts to Telkwa Caribou Herd.	A) Please provide the following information regarding the Goathorn Creek Bridge: - Hours that the bridge's gates will be locked. If gates are not locked 24/7, how does the Proponent propose to restrict access? - How recreational users will contact TML personnel to receive an escort and educational engagement. - What hours these services will be available, and if recreational users will be able to cross the bridge if no TML staff are available to provide an escort/education. B1) Please meaningfully consider existing and forthcoming information from Wet'suwet'en to accurately identify impacts to caribou and develop effective, culturally appropriate mitigation measures to address those impacts; B2) Please meaningfully consider existing and forthcoming information from Wet'suwet'en to determine how to collect and/or share data on public use with OW, and determine whether (and what) further mitigations may be required as data is collected overtime; B2) A commitment to engage with OW prior the	Telkwa Mining acknowledges the comment. A) 1.The bridge gates will be electronically locked 24/7 hence the requirement for escorts. Furthermore, cameras will be positioned at gate locations to observe interactions at these locations and detect if people are accessing the property without following appropriate access protocols. 2.) As provided in section 6.5.3 Users are to contact Telkwa Mining for an escort through one or all of the following ways A) telephone, B) Web portal as part of the mine website C) In person at the Telkwa Mining Office D) email info@telkwa-mining.ca 3.) As provided in section 6.5.3 of the PAMP, recreational users will not be able to cross the bridge if no Telkwa Mining staff are present to provide an escort unless they were to ignore signage and disable the gate. A draft schedule is provided below which can be amended as required. Summer Schedule - High Season: between Canada Day and Labor Day long weekends: seven (7) days a week; inbound to Parking Area 1 every four (4) hours starting at 8:30 a.m. and ending at 20:30 p.m.; outbound from the Parking Area 2 every four (4) hours starting at 13:00 p.m. and ending at 21:00 pm.; and by request by using the company

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				Effects Assessment phase to determine how to collect and/or share data on public use with OW, and determine whether (and what) further measures regarding access may be required as data is collected overtime; C) Please commit to providing Wet'suwet'en the opportunity to co-develop educational material that will be given to users of recreational areas in caribou habitat. Engagement must ensure Wet'suwet'en perspectives and objectives are adequately integrated into the material. D) The Proponent must develop an access plan with Wet'suwet'en members to ensure members' right to enjoy and exist peacefully on the land is upheld.	website, email, sign-in sheet in Telkwa, and/o telephone at least 72 hours prior to access being required. Summer Schedule - Low Season: between Victoria Day and Canada Day long weekends and between Labour Day and Thanksgiving Day long weekends: weekends including Friday only; inbound to Parking Area 1 every four (4) hours starting at 8:30 a.m. and ending at 20:30 p.m.; outbound from the Parking Area 1 every four (4) hours starting at 13:00 p.m. and ending at 21:00 pm.; and by request only using the company website, email, office, sign-in sheet in Telkwa, and/or telephone at least 72 hours prior to access being required. Winter Schedule: between Thanksgiving Day long weekend in October and Victoria Day long weekend in May of the following year: no service between December 20 and January 5 without prior arrangement; weekends not including Friday; inbound to Parking Area 1 at 9:30 a.m. and at 13:30 p.m. and 17:30 p.m.; outbound from Parking Area 1 at 13:00 p.m. and at 17:00 p.m.; and by request only using the company website, email, sign-in sheet in Telkwa, and/or telephone at least 72 hours prior to access being required reflecting the times below. Furthermore, for any special events and/or other access requirements, arrangements can be made with Telkwa Mining for facilitating access. 3. B1) When this information is provided by the OW this will be

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					incorporated into the Tenas YMD-Enhanced Caribou Monitoring and Management Plan and the YMD-Enhanced PAMP. B2) Telkwa Mining commits to engage with the OW prior to the Project commencing construction on how to collect an share data on public use with the OW and determine when and what further measures regarding access may be required as data is collected overtime. The current plan will have a sign in sheet or system that non Telkwa Mining employees and contractors entering and exiting will be required fill out, which will also verify information on the number of people, vehicles, duration, expected activities and location of these activities. This information will be requested when reserving a spot for escort and the system will not allow a successful booking unless the information is provided. This information will be available monthly to the OW and other groups so they can see when people came and went from site. C) Telkwa Mining commits to providing Wet'suwet'en the opportunity to co-develop educational material that will be given to users of recreational areas in caribou habitat and that the engagement will ensure Wet'suwet'en perspectives and objectives are integrated into the material. This could be a condition of permit documents. Telkwa Mining envisions this to be a video presentation with an exam which can be completed as part of the reservation system with people needed to complete this review and score a minimum of 80% on the exam prior to a booking being allowed by the system. For users who just show

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					up they will be required to go through the same process in Telkwa Mining's office in Telkwa. D) As stated in Section 6.3 below of the PAMP, Telkwa Mining is committed to amending the YMD-Enhanced PAMP with Wet'suwet'en members to ensure members' right to enjoy and exist peacefully on the land is upheld. This engagement will occur once OW provides input on which members, how many and a suggested engagement strategy to accomplish this adequately. Currently there is no bridge to enable users to access areas west of Goathorn Creek. Users ford (drive through) Goathorn Creek. Telkwa Mining installing a controlled bridge access does not change the current use. Users will still be able to ford the Goathorn Creek outside of the Project Footprint. Telkwa Mining will work with the OW, Witset First Nation, Skin Tyee First Nation and Wet'suwet'en First Nation to develop procedures that meet their requests. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to access to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-034	492	Appendix D - Information Requirement Response — Impact of	Recreational Access LWRS acknowledges TCL response and requires more information. The Public Access Management	(See comment above.)	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-033.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Upgraded Recreational Access on the Telkwa Mountain Caribou Subpopulation	Plan does not include any mention of an educational component about caribou use or mitigation strategies. Rather, the plan highlights new access routes for "a broad range of transport, including horse, walking, biking, snowmobiles, quads, side by sides, motorbikes, and motorized vehicles". The plan should clearly state how new access roads will impact the Telkwa caribou herd and propose mitigation strategies.		
OW-035	NEW	2023-07-04 EAO - ORDER AMENDING SECTION 11 ORDER UNDER THE FORMER ACT AND SECTION 78(7) ORDER UNDER THE ACT Section D of	Fish and Fish Habitat Telkwa Coal Limited must conduct ground-based surveys for spawning activity or evidence of spawning activity of steelhead/rainbow trout, with a focus on smaller creeks that overlap the local study area. The	The value of Tenas Creek and Goathorn Creek as critical steelhead spawning habitat is unclear. TML must identify critical steelhead spawning habitat before the potential risks of the Project to steelhead can be determined, as per the Information Requests sent by the BC EAO on June 6, 2023.	The 2023 Spring Spawner Survey (Palmer 2024a, Attachment OW-022-1) was conducted in accordance with accepted field standards and practices for fish habitat assessments in British Columbia. The Steelhead spawning period, however, coincides with the spring freshet, during which environmental conditions such as elevated water levels and high turbidity can reduce visibility. These conditions can result in the non-detection of fish and/or spawning habitat, even when the surveys are carried out in full compliance with provincial standards. Furthermore, in some cases, freshet conditions make sites unsafe to access, and therefore data is not able to be collected.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Schedule A of the Transition Order: Tenas Project Information Requests: Fish and Fish Habitat June 6, 2023, Fish and Fish Habitat 3.3.2 Spring Spawning Survey "Suitable steelhead spawning habitat was not observed during the Spring Spawner Survey at any site, with the exception to WQS13 (Goathorn)."	objective is to identify any habitat use in the project area by adult steelhead, including migration and spawning. The spatial extent of surveys should extend from a stream's confluence with the Telkwa River or Goathorn Creek upstream to the end of fish use. Methods to employ can include spawning surveys, redd surveys, fry emergence surveys, DNA, biometrics, habitat suitability assessments, and any other methods deemed appropriate and informative.		The absence of observed Steelhead or high-quality spawning habitat during the Spring Spawner Survey does not indicate a change in habitat; instead, it highlights the inherent limitations of conducting surveys during periods of challenging environmental conditions. It is possible that steelhead spawning habitat exists in Goathorn Creek and Tenas Creek downstream from the Project. There are no barriers preventing fish, including steelhead, from accessing these creeks. While spawning habitat may have been recently assessed as poor in areas previously identified as suitable in the baseline study, this does not rule out the presence of spawning habitat elsewhere in the creeks, nor does it mean that steelhead are unable to spawn there. Telkwa Mining will continue to monitor and study the likelihood of steelhead spawning habitat existing within the entire portions of both Goathorn and Tenas Creeks that are downstream from the Project. It is expected that this monitoring and any additional surveys will be conditions of the EAC. To address the OW's comment regarding the current use of Goathorn Creek, Four Creek, Tenas Creek, and Helps Creek by Steelhead, abundance surveys will be completed in 2025. This program is comprised of one representative site per reach in each creek and will utilize three-pass depletion electrofishing to calculate abundance estimates of key species. Telkwa Mining will also conduct additional habitat surveys to identify and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					quantify any critical spawning habitat within Goathorn Creek, Four Creek, Tenas Creek, and Helps Creek in 2025. The habitat assessments will use Fish Habitat Assessment Procedure (FHAP) surveys focused on areas which could support fish spawning. Since 2022, new data has been added to the Water Model to the end of 2024. The updated models predict no Project-related exceedances of the chronic BC water quality guidelines for the protection of aquatic life, including steelhead and rainbow trout, besides those parameters in baseline monitoring that are naturally exceeding these same guidelines. As requested by the OW, Telkwa Mining will discuss with OW and the regulators on the appropriate incorporation of the results of these studies regarding Steelhead to Indigenous interests or Indigenous nations into further Project design, monitoring, mitigation, and adaptive management plans. This may occur during Project Development processes and/or be incorporated as appropriate in the development of the operational management plans. The management plans that will be in place for the Project will have measures to adapt the details of the management plans to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies or from ongoing monitoring.
OW-036	NEW	2023-07-04 EAO - ORDER AMENDING	Fish and Fish Habitat Telkwa Coal Limited must conduct ground-based	As inappropriate analyses were used to characterize the life histories of O. mykiss in the Project Area, the Proponent's assertion that they are on average resident rainbow trout is not	The concerns regarding the morphometric analysis presented in Palmer (2024a, Enclosure 1: Attachment OW-022-2) to characterize the life histories of Rainbow Trout (Oncorhynchus mykiss) within the Project area are acknowledged. To clarify, the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		SECTION 11 ORDER UNDER THE FORMER ACT AND SECTION 78(7) ORDER UNDER THE ACT Section D of Schedule A of the Transition Order: Tenas Project Information Requests: Fish and Fish Habitat June 6, 2023, Fish and Fish Habitat Section 3.5 Morphometric Analysis	surveys for spawning activity or evidence of spawning activity of steelhead/rainbow trout, with a focus on smaller creeks that overlap the local study area. The objective is to identify any habitat use in the project area by adult steelhead, including migration and spawning. The spatial extent of surveys should extend from a stream's confluence with the Telkwa River or Goathorn Creek upstream to the end of fish use. Methods to employ can include spawning surveys, redd surveys, fry emergence surveys, DNA, biometrics, habitat suitability assessments, and any other methods deemed appropriate and informative.	supported. The Proponent has not meaningfully addressed the IR and the issue of a lack of knowledge of the extent and value of the streams as critical spawning habitat for steelhead remains outstanding. TML must use an appropriate analysis to characterize the life histories of Oncorhynchus mykiss in the Project Area.	technical report does not assert the absence of either resident Rainbow Trout or migratory Steelhead life history types in Goathorn Creek or Tenas Creek. Rather, the analysis was presented as a supplementary approach to provide further insight into potential Steelhead presence, particularly given that the 2024 Spring Spawner Survey was constrained by site conditions. It is agreed that Steelhead spawning is possible within Goathorn Creek and Tenas Creek because there are no known barriers to fish movement between these systems and the Telkwa River. Additional habitat surveys that focus on identifying key Steelhead and Rainbow Trout spawning habitat features will be conducted in 2025. The objective of these surveys is to identify areas of potential spawning habitat within Goathorn Creek and Tenas Creek. As requested by the OW, Telkwa Mining will consider any forthcoming information on Steelhead and fish spawning habitat including impacts from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans. This information will be considered in subsequent Project Development processes incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-037	307	page 1-2 in Appendix M; Table 2-4 in TML Water Quality IR Response	Surface Water Quality Consider the impacts of exceeded BC water quality guidelines (WQGs), particularly to aquatic biota and resident fish populations, at a local scale rather than regional scale.	OW Recommendation The Local Study Areas (LSA) were delineated to capture all potential direct effects (e.g., erosion, off-site siltation, dilution zones from pipes or groundwater) and indirect effects of limited spatial extent (e.g., edge effects), and the Regional Study Area (RSA) was delineated to capture all direct and indirect Project affects that could affect a VC. While the Proponent argues that "the use of a LSA precludes consideration of all potential adverse effects, and would artificially and inappropriately inflate the magnitude considered in the characterization", these local effects are ALSO important to characterize as they represent impacts at local scale that contribute to cumulative effects at the RSA. The LSA also describes the immediate impacts of the Project area, which are not irrelevant as that area of impact is an ecosystem of value being affected by the Project, even if at the larger scale the local impacts are diluted. The fact that the Proponent refuses to also do an assessment at the LSA likely indicates that impacts to the VC at the LSA are larger than they would like to communicate, because they are	Telkwa Mining acknowledges the comment. Please refer to Attachment 307-1 (OW-037-1) that provides a rationale on why the RSA was used versus using the LSA as suggested which is based on precedent from other completed EA studies. The Environmental Assessment Certificate Application for the Tenas Project (May 2022) evaluated the effects on surface water quality at both the Local Study Area (LSA) and the Regional Study Area (RSA) levels, with the ultimate significance determination being made at the RSA level. This approach is consistent with guidance from the British Columbia Environmental Assessment Office (BC EAO) and is considered appropriate when cumulative effects are possible, downstream receptors could be affected, and to establish context for baseline variability. This approach results in a more complete understanding of potential effects. Since 2022, new data has been added to the Water Model to the end of 2024. The updated models predict no Project-related exceedances of the chronic BC water quality guidelines for the protection of aquatic life except for those parameters in baseline monitoring that are naturally exceeding these same guidelines downstream from the Project outside of the initial dilution zone for either the RSA or LSA. Based on this information it is not expected that Project will have significant adverse effect on the water VC.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				reduced at the RSA. In addition, based on the updated modeling results for the EAC Project Case (Table 2-4 in TML Water Quality IR Response), there are still exceedances of BC WQG in Four Creek and Tenas Creek (Appendix I_Memo_MitigationMeasures), so the rationale behind claims that there are no exceedances even with the new proposed mitigation measures is unclear. TML must assess the impacts of exceeded BC water quality guidelines (WQGs) in the LSA in addition to the RSA.	It should be noted that significance of adverse effects on surface water quality would remain as “Not Significant” even if the magnitude of the effect on water quality were changed to "High" to align with the higher affected percentage in the LSA (14%) in comparison to the RSA (2%). The assessment methodology defines a significant effect as one that is of High Magnitude, has a Regional or greater extent, and is Long-term in duration. As the effects on water quality are confined to the Local Study Area (LSA), they do not meet the required "Regional" geographic extent criterion. Because all three specific conditions are not met, the effect would still be classified as "Not Significant". In addition, Attachment 307-1 (OW-037-1) provides a rationale for why the RSA was used versus using the LSA, and provides examples of this methodology from other completed EA studies. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-038	350 and 351	Section 3, Section 4	Water Mitigation Measures and Treatment Options 1. Provide additional mitigation measures to address the significant exceedance of WQGs in	The Proponent provides viable options for reducing concentrations of selenium, sulfate, cadmium, and nitrate/nitrite including a combination of multiple treatments. In some cases (Table 9), exceedances still occur (e.g., selenium, nitrate) at the end of	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from Office of the Wet'suwet'en memo, SRK June 2025] Attachment OW-011-1. This IR response was divided in two parts, addressing first the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			frequency and duration for selenium, nitrite, sulphate and dissolved cadmium in Four Creek and Tenas Creek.	pipe, even when multiple treatments are applied, particularly from the Tenas Control Pond. While the right combination of mitigation treatments will definitely improve downstream water quality, there are impacts to local streamflow and in some cases other constituents (e.g., increases in selenium). The most concerning reductions in streamflow for both Tenas and Four Creek are during late summer months (August) and winter baseflows. It doesn't appear that these reductions in streamflow have been modelled within the Water Load Balance Model to predict how the lower flows will impact downstream WQ at prediction nodes, although reduced concentrations in surface and groundwater should help, reduced water flow could end up balancing that reduction and total constituent loading may ultimately not change much. This warrants further investigation. To resolve these issues, TML must: • Provide more information on how the reduction of water flow in the Tenas and Four Creek is involved in mitigations for reducing concentrations of selenium, sulfate, cadmium, and nitrate/nitrite; • Provide data for how this reduction is incorporated into the Water Load Balance Model to predict how the lower flows will impact water quality downstream, especially during late summer	request for more information on how the reduction of flows in Tenas and Four Creeks is accounted for in the model, then providing more information on the mitigation measures and best management practices considered in the Best Achievable Technology Assessment. Additional Information about Reduction of Flows in Tenas and Four Creeks SRK has completed an extensive update to the Water and Load Balance Model since 2022 which is provided in Attachment OW-038-1 (SRK 2025b). These changes were summarized in the introduction of this document. SRK has also completed two technical evaluations of proposed water mitigations, including the reliability and risks associated with effective treatment, in addition to the expected beneficial change in 2024-2025. These are described in the following two reports: 1) Effect of Mitigation Controls on Water Quality and Quantity of the Tenas Project (Attachment OW-038-2, SRK 2025c), which is an updated version of the memo that described the effect of mitigations (from May 2022). The updated memo includes the changes made to the Water and Load Balance Model between 2022 and 2024 (as described in the updated Water and Load Balance Model report 2025 [Attachment OW-038-1]), and 2) Tenas Project – Best Achievable Technology Assessment Report (Attachment OW-038-3, SRK 2025d). A regional groundwater model was developed for the Tenas Project's EAC Application to help quantify the potential reduction of flow in Tenas and Four creeks, including during low flow conditions. The groundwater model was developed in 2022 and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				months (August) and winter baseflows; • Provide more information on the proposed water mitigations, including the reliability and risks of each option associated with failure of effective treatment, in addition to the expected beneficial change and the expected consequences of each treatment option;	was updated in 2024 (Attachment OW-038-4, SRK 2024b). That model estimated groundwater fluxes, discharge, and recharge from the Project. Groundwater connections are incorporated into the water and load balance model based on three components: direct connections to Project infrastructure, changes to stream baseflow, and load transport to streams. The change in water levels (groundwater head) within the Management Ponds, Control Ponds, and the open pit affect the groundwater discharge rates to each downstream creek and river. The calibrated rainfall-runoff model (in the water and load balance model) included a constant unit baseflow for each major creek, which is applied to each associated prediction node. To understand the change to baseflows attributed to the mine development, the groundwater model predicted baseline baseflow and baseflow during mining at each prediction node for each scenario. The forecasted change to baseflow between baseline conditions and mining conditions were directly applied to the baseflow component for each prediction node in the water balance model. Baseflow dominates the total streamflow during winter months but represents a minor portion of the total streamflow during the open-water season, late summer flow included. Baseflow rates in the receiving environment increase or decrease, depending on location in relation to the open pit and the Management Ponds. While the water outflows from the mine site into the groundwater system and into the creeks happen instantaneously due to its relation to the water head, there is a natural lag between the timing of seepage at the source and the seepage containing contaminant particles being observed within

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					the various stream prediction nodes (because of the slow travel time of groundwater). Particle tracing within the groundwater model (Attachment OW-038-4, SRK 2024b) revealed that a small portion of seepage reaches the adjacent reach of Tenas Creek before end of mining, but that most of the seepage will not be observed until well past closure. A conservative estimate is used in the water and load balance model of 25 year lag before the particles reach the streams. The contaminant load reaching each prediction node is calculated based on the percentage of particles leaving each Management Pond, open pit or Tenas Control Pond that reach each node under steady-state conditions, taking into account the dilution of mine seepage into the groundwater system. The mitigations that affect stream flows in Four and Tenas Creek are represented by Mitigation Controls 2 and 3 in the “Effect of Mitigation Controls on Water Quality and Quantity of the Tenas Project” memo (Attachment OW-038-2, SRK 2025c), which include the thicker liners compared to those used in the Final EAC Project Case (2024). The different liners used in the 3 different scenarios is outlined as follows: Final EAC Project Case (2024): - Soil-bentonite liner (0.3m) for EMP, NMP, and WMP (excluding WMP End Wall rock); - Bituminous geomembrane liner for the Tenas Control Pond. Mitigation Control 2: - Soil-bentonite liner (0.56m) for EMP, NMP, and WMP (excluding WMP End Wall rock); - Bituminous geomembrane liner on top of soil-bentonite liner

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					(0.15m) for the Tenas Control Pond. Mitigation Control 3: - Bituminous geomembrane liner on top of soil-bentonite liner (0.3m) for EMP; - Soil-bentonite liner (0.56m) for NMP, and WMP (excluding WMP End Wall rock); - Bituminous geomembrane liner on top of soil-bentonite liner (0.15m) for the Tenas Control Pond The effects of thicker liners are two-fold: reducing groundwater seepage to the streams compared to Final EAC Project Case (2024) and reducing contaminant load transported into the groundwater system pathways due to reduced seepage. Figure 1 1 illustrate the effect on flow in Tenas Creek (WQS04) and in Four Creek (WQS03_DS) due to the effect of thicker liners. In both cases, thicker liners cause a greater percent reduction in creek flows. Figure 1 2 shows the expected reduction in selenium concentrations if thicker liners are used. The reduction in concentrations is expected to be more significant for Four Creek. Note that the effects on flow and on concentrations do not occur at the same time because of the groundwater travel time delay the arrival of management and control pond water by about 25 years. Additional Information about Proposed Mitigation Measures and Best Management Practices: The risks and beneficial effects of water mitigation controls were evaluated using the water and load balance model for the Tenas Project (Attachment OW-038-1, SRK 2025b). Table 1 1 shows a

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					summary of mitigation control measures that were considered as part of the water and load balance evaluation. The mitigation controls can be categorized either as source control measures/best management practices (BMPs) or as best achievable technologies (BATs). This distinction is relevant because BC ENV has issued guidance on how candidate BATs must be evaluated (BC ENV 2024). That guidance states that BMPs must be evaluated separately and prior to a BAT assessment. In other words, a mine operation should first implement BMPs, which include source control measures such as mine rock covers or inundation of mine rock as well as operational practices that are carried out on a day-to-day basis such as the use of blast-hole liners. Only after BMPs have been considered and included as part of the Project description can BATs be considered. BATs are technologies that require construction of site infrastructure and implementation of water treatment equipment – i.e., typically more conventional pump and tank-based water treatment options. Best Management Practices as Mitigation Control Measures (see also Attachment OW-038-2) Through the development and design of the Tenas Project, TML has made efforts to include as many source control measures and BMPs into the Base Case as are practically achievable to manage water quality within and downstream of the Project Area, including: § Inundation of potentially acid generating (PAG) rock in the management ponds on site to prevent potential Acid Rock

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Drainage, § Lining of the management and control ponds to reduce seepage and groundwater recharge, § Progressive reclamation and covering of non-potential acid generating rock (non-PAG) backfilled into the open pit, § Construction of dam/butresses and backfills (and any potential external permanent piles and stockpiles) using a bottom-up construction methodology, § Attenuation of treated effluent in Tenas Control Pond, § Pacing of treated surface water discharge to the open water season, § Erosion prevention in collection and diversion channels, § Sediment control in sedimentation/control ponds, and § Clean (non-contact) water diversions to route water around Project activities. In addition to these, three other BMPs that had not previously been considered were evaluated in the water and load balance model study, namely (see Table 1 1): § MC1: Improve the robustness of the water covers in the management ponds and reduce loadings from waste rock by increasing the site water inventory during freshet, § MC4: Increase of process water intake to CPP plant, and § MC5: Addition of blasthole liners. Of these three, the addition of blasthole liners (MC5) was found to be suitable and feasible as a water quality mitigation measure for the Tenas Project, and TML therefore committed to using liners for the future mine operation. The two other BMPs, improving the robustness of the water cover (MC1) and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					increasing process water intake to CPP plant (MC4) were not considered to be suitable because they would (or could) reduce streamflow in Four Creek in the open-water season months (MC1) or would not lead to any notable improvement in the quality or quantity of discharge from the site (MC4). Blasthole liners work by reducing the amount of blasting residuals (undetonated ammonium nitrate fuel oil (ANFO) explosives) that dissolved into the mine contact water and thereby increases ammonia and nitrate concentrations. Undetonated ANFO is one of the main sources of nitrogen (nitrate, nitrite, and ammonium) in contact water at the mine site. Loadings of residual nitrogen species that leach from the rock into the mine water can be reduced if blasthole liners (long plastic bags that fit into the blasthole) are inserted as holes are loaded with explosives. The primary purpose of the liners is to prevent water from contacting and dissolving the ANFO explosive prior to blasting. For this mitigation control, the model assumes a total ANFO loss (and dissolution in mine water) of 1.25% when blasthole liners are used compared to 2% loss when liners are not used, which corresponds to a 32% reduction in ammonia, nitrate, and nitrite loadings. The use of blasthole liners increases the cost of mining because of the time it takes to insert liners into the blasthole before loading the explosives as well as the cost of the liners. However, there are no notable operational risks associated with the use of liners, only benefits. Best Achievable Technologies as Mitigation Control Measures (also see Attachment OW-038-2)

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					As discussed above, a BAT assessment was completed for the Project after review and selection of BMPs. The BAT assessment methodology followed guidance issued by the BC Ministry of Environment and Climate Change Strategy (BC ENV) in November 2024. The purpose of the BAT assessment was to identify technologies that are best suited for managing or mitigating identified Parameters of Concern (POCs) in modelled groundwater seepages and surface water discharge of treated effluent from the Project. POCs included nitrate, nitrite, sulphate, aluminum, cadmium, cobalt, copper, iron, nickel, zinc, molybdenum, and selenium. The BAT assessment is required to consider all possible technologies that potentially could remove one or more POCs. The BAT assessment for the Tenas Project identified 24 different technologies that potentially could be implemented. BC ENV recognizes that even though a technology theoretically could remove one or more POCs, there may be other reasons why it would not be suitable for treating water at a mine site. The BAT methodology lists the following reasons why a technology can be considered unfeasible: § Inability to achieve environmental criteria: – For example, a technology may remove some nitrate or metals but not enough to meet anticipated water quality effluent limits or downstream objectives. § Lack of existing commercial applications: – Technologies considered as BATs must, at a minimum, have a demonstration system operating at near full-scale in the same industry and under similar site-specific conditions. BC ENV's

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					guidance states that technologies considered for an Environmental Assessment Certificate application must have a Technology Readiness Level of 7, 8, or 9 to be considered potentially feasible. § Operational complexity: – This criterion considers several factors which may include, but are not limited to operator attendance requirement, chemical requirements, ease of process control, level of automation, level of expertise required to operate the system, maintenance requirements, and downtime expectations (for maintenance and repairs). After evaluating the feasibility of the 24 identified technologies, nine were found to be potentially feasible and carried on to a more detailed assessment: 1. Passive/Active Flocculation. 2. In-situ Active Gravel Bed Reactor (GBR). 3. Membrane Filtration + Moving Bed Bioreactor (MBBR). 4. Membrane Filtration + MBBR + High Density Sludge Lime. 5. Membrane Filtration + MBBR + Sulphide. 6. Membrane Filtration + MBBR + Ferric. 7. Membrane Filtration + MBBR + Ion Exchange. 8. Zero Liquid Discharge. 9. Modified Liners in Management and Control Pond. In addition to these nine, the Base Case with only BMPs included (i.e., the case with no additional BATs implemented) were also considered for comparison. BC ENV's guidance requires that the following general categories are used to evaluate BATs:

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					§ Reliability. § Control-effectiveness. § Environmental impacts, and § Cost effectiveness. Table 1 2 shows the criteria included in each of the categories, and how much importance (or weight) is assigned to each in the final assessment. TML added the evaluation category “Adherence to Yintah Management Directives” to formally include at least some direct consideration of first nations interests. The evaluation categories in Table 1 2 include reliability, risk, and expected benefits, which were referenced in the review comment. Risk and robustness are included in the reliability category. BC ENV described the ‘risk assessment’ criterion as follows: “Risk Assessment - Conduct a risk assessment for each technology to identify the potential risks associated with the implementation, operation, and maintenance of the technology. These risks may include but are not limited to the likelihood of process failure, environmental and human health risks resulting from process failure, as well as risks associated with secondary waste production (by-products) that may impact the environment and human health.” BC ENV describes the ‘robustness’ criterion as follows: “Robustness - means consistent and reliable performance under various conditions over the technology operational life. Evaluate technologies based on their ability to maintain effectiveness and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					performance under the fluctuations in operating conditions such as effluent quality (physical and chemical characteristics) and quantity (flow).” The expected beneficial water quality changes associated with water treatment technologies were evaluated as part of the control-effectiveness category. Additional information on other assessment criteria listed in Table 1 2 that were not specifically referenced in the review comment are included in the BAT assessment report in Attachment OW-038-3. From a water treatment and water quality protection perspective, the risk profile for the project is low. The updated water quality model results indicates that all water quality parameters in receiving waters downstream of the Project are expected to remain below chronic BC water quality guidelines (except for copper, which is naturally elevated in background waters). Therefore, if water treatment were to be implemented and subsequently fail it is unlikely that the lack of water treatment would adversely affect water quality in downstream waters since concentrations are expected to remain below BC water quality guidelines even without any water treatment. As discussed above, the BAT assessment weighted the potential beneficial effects of implementing various treatment options versus the risk, costs, and general consequences associated with each option. The multiple-accounts analysis (MAA) evaluation (Table 1 3) shows the scores assigned to the expected beneficial changes (pollutant reduction, toxicity reduction, and robustness categories) as well as scores assigned for reliability and risks (robustness and risk assessment categories). The

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					categories are scored on a scale from 1 to 5, where 1 represents a poor score (poor expected performance, low reliability, or high risk) and 5 represents a good score (expected to perform well, highly reliable, or low risk). Most of the technologies considered achieved scores of 3 or 4 (out of 5) for the risk assessment and robustness (i.e., reliability) categories. This means that reliability and risks associated with the different options are somewhat similar. The pollutant reduction category, on the other hand, shows that there is a greater different in expected beneficial effects with scores ranging from 1 to 4.5. However, the better performance comes at a cost with lower scores for cost-effectiveness and environmental and socio-cultural impacts. The following was concluded based on the assessment of Best Achievable Technologies for the Tenas Project: § The Base Case option is a highly rated and feasible option for protecting downstream water quality without the need for any further BMPs or technologies to be incorporated. § In-situ Active GBRs with the Base Case and Passive/Active flocculation with the Base Case are also highly rated and feasible options that should be retained as contingency options during permitting if water quality predictions for the Project differ substantially from actual conditions observed during the development of the Project and water quality monitoring results are trending toward exceedances of the WQGs. § To improve on the technology readiness level of the In-situ

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Active GBR technology, TML should develop a Pilot In-situ Active GBR within the Coal Processing Plant (CPP) Sedimentation Pond or alternate. § Active tank-based water treatment options with the Base Case are less suitable but feasible and should be retained as contingency options during permitting if water quality predictions for the Project differ substantially from actual conditions observed during the development of the Project and water quality monitoring results are trending towards exceedances of the WQGs. § Modification of management and control pond liners with the Base Case is less suitable but feasible and should be retained as a contingency option for the WMP during permitting if water quality predictions for the Project differ substantially from actual conditions observed during the development of the Project and water quality monitoring results are trending towards exceedances of the WQGs. Additional details concerning the two studies cited in the above response are available in Attachments OW-038-2 and OW-038-3. Finally, to address the last point of this IR, Telkwa Mining has carefully considered the reduction in flows and is not considering any mitigation that would induce further reduction in flows beyond what is shown in the Final EAC Project Case (2024). In addition, no exceedances above BC WQG has been shown to occur, outside of already elevated background concentrations such as copper. The current model results (in the Final EAC Project Case [2024]) showing reduction in flows from baseline is

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					currently assessed by SLR Consulting for its effects on fisheries. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans.
OW-039	350 and 351		Water Mitigation Measures and Treatment Options 2. Provide design alternative treatment options which are capable of meeting WQGs near appropriately sited discharge locations. Describe the reliability, control-effectiveness, and treatment efficiency of each mitigation option including the currently proposed option -- Reduce the seepages through the management pond liners by 90% and assume low flow conditions (modified alternate proposed option – refer to BC ENV Best Achievable Technology	The reliability and risks of each option are not discussed, and very little information is provided on situations where the mitigation option may be less effective/ ineffective (i.e., high or low run off conditions, liner failure, etc.). The water treatment plan option (Control 5) appears to be one of the most effective options, particularly when combined with other options. However, the design details of the water treatment plant have not been developed (which the proponent acknowledged in the document), and the reductions in constituent concentrations are only assumed. This would require additional storage and appropriate treatment rates, along with additional energy and waste disposal costs. As water treatment, in combination with other approaches, is the most effective way of reducing exceedances from the ponds, this option should be pursued but TML must provide more information on the details of that process (including detailed operations of the treatment facility over time, energy and water use,	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from Office of the Wet'suwet'en memo, SRK June 2025] Attachment OW-011-1. The majority of the information requested by Office of the Wet'suwet'en is included in the 2025 Best Achievable Technology (BAT) assessment report prepared by SRK consulting for TML (SRK 2025d and Attachment OW-038-3). The BAT assessment was conducted in parallel with a water quality model study that also looked at implementation of mitigations controls (i.e., Best Management Practices, or BMPs in the mitigation report (SRK2025b or Attachment OW-038-2)). In the BAT assessment, all possible water treatment alternatives are evaluated at a conceptual level and are scored and ranked according to various performance, reliability, environmental impact (including energy consumption), and cost criteria in accordance with 2024 guidance issued by the BC Ministry of Environment and Parks. The BAT assessment specifically evaluates suitability and risks associated with water treatment technologies. For example, the assessment concluded that in-situ gravel bed reactors (GBRs),

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			(BAT) guidance. BAT assessments are required prior to the development of Initial Dilution Zones (IDZs) – also refer to BC IDZ development guidance.	and efficiency of treatments, etc.). TML must provide further information on alternative treatment plans and outcomes that describe how the water treatment facility would be designed, what standards would be used, the operation, and the duration.	active and passive flocculation, and active water treatment options should be incorporated into the development plan as contingency measures for the Tenas Project in case parameter concentrations in future discharges are higher than modelled by the water and load balance model. As discussed in the response to OW-038, the risk associated with treatment processes that may be less effective than presumed is low because BC water quality guidelines prescribed for downstream receiving waters are expected to be met even if no water treatment is implemented. As also discussed in response to OW-038, the active water treatment plant options score better (scores of 2.5 to 4.5) than best management practices alone (score of 1) for treatment performance. However, the active water treatment plant options have considerable drawbacks that do not make up for their better treatment performance, and active water treatment plants are therefore not the preferred option to go forward with for this Project when evaluating holistically all aspects that need to be considered when ranking a particular technology. Nonetheless, TML has committed to including active water treatment options as contingencies in case the best management practices do not perform as well as expected or in case the mine water quality has higher parameter concentrations than modelled. Active water treatment, active/passive flocculation and/or In-situ Active GBRs will be implemented via a trigger action response plan that will include the monitoring of parameters of concern in the management and control ponds, at the end of the pipe, in the receiving environment, and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					groundwater seepages. If monitoring data indicates that one of these contingencies will be needed to avoid significant adverse effects to the surface/groundwater Valued Components it will be implemented at that point. Detailed design information requested in this review comment associated with active water treatment will be provided as part of permitting process for the two contingency options recommended by the BAT as it is outside the requirements of a BC environmental assessment. As recommended by the BAT report in Attachment OW-038-2) an active water treatment plant is not the highest ranked option to pursue and is being maintained as contingency option that will be implemented as required based on a Trigger Action Response Plan (TARP), which will be developed for permitting. The highest ranked options are to (1) continue with the existing Base Case (also called Final EAC Project Case 2024) with best management practices incorporated (2) use passive or active flocculation to remove suspended solids, (3) implement In-situ Active GBRs in the management ponds in addition to the BMPs incorporated in the Base Case. TML has committed to developing a pilot In-situ Active GBR in the Coal Processing Plant Sedimentation Pond or alternative pond to improve this technology's TRL to at least an 8 for the targeted Parameters of Concern prior to the end of Year 4 of the Operation Phase. The reduction in POC concentrations that can be achieved by different treatment technologies are generally very well understood. Most technologies are operating at many different mine and/or industrial sites all over the world. True site-specific

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					performance testing can only be performed once the mine water from the Tenas Project becomes available. Until that happens, the technology performance estimates will be based on reliable data from other sites. As discussed in the response to OW-038, TML considered 24 alternative treatment options in the BAT assessment (Attachment OW-038-3). The preferred options were to proceed with (1) the Base Case that includes best management practices, (2) use passive or active flocculation to remove suspended solids, (3) active In-situ GBRs, and finally (4) active water treatment, most likely using reverse osmosis and moving bed bioreactors with high density sludge lime treatment. The design of each of these control measures would begin with the development of a detailed design basis, which would specify the flow rates, water quality, and temperature of the water to be treated, how much water would need to be treated in each month, and what effluent concentrations would have to be achieved. Based on this design basis, engineers will proceed with preliminary designs, which will be reviewed at 30%, 60%, and 90% complete stages. Following these reviews, issued for tender designs will be submitted to water treatment equipment companies who will issue proposals for manufacture, supply, and construction of the water treatment facilities. At that stage, a final design for construction is completed. Design standards to be used can be specified in the design basis, or they can be defined by each equipment supplier as part of the proposal. The company supplying the active water treatment equipment would be responsible for commissioning the active water

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					treatment system, but TML would be responsible for operating it for the life of the mine and potentially beyond into the Post-Closure phase. According to the updated water quality model results, active water treatment is not expected to be necessary during the operating phase of the mine or following closure as model results show no water quality guideline exceedances in the Receiving Environment under the Base Case (Final EAC Project Case 2024, as presented in Attachment OW-038-1). Active water treatment should therefore not be necessary. However, TML will develop a TARP that specifies criteria for when and under what circumstances active water treatment would be implemented despite the expectation that no treatment is needed based on the modelling work completed. As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans
OW-040	356	Appendix F, Section 4.10.3-4.10.4; Attachment IR 356-1 (This attachment located in App F has no information, not reviewed); "Final	Pond Liner Design and Surface Water Quality Have a QP run three new WLBM scenarios. Add a new node to the WLBM in Goathorn Creek, 100m downstream of the confluence with the tributary into which the effluent is discharged. For	We are unable to find the documents containing the results of this IR response, "Final EA Water and Load Balance results", or Attachment IR 356-1 as the IR response does not provide further information regarding where these documents are located. We are unable to find any documents with that name in the review materials provided to us and therefore could not review the IR. Please provide these documents, including figures for	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Please refer to Attachment OW-038-1 for the Updated Water and Load Balance Model report (SRK, 2025) and refer to Attachment OW-040-1 for Updated Figures 2-2 through 2-4 with corrected connections for Four, Tenas, and Goathorn Creeks.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		EA Water and Load Balance Report"(could not locate, not reviewed)	the 3 scenarios listed above, for each node where a parameter is predicted to exceed a chronic BC WQG PAL, each graph, show the chronic BC WQG for the most sensitive use or value.	each of the requested scenarios in the IR (Tributary receiving discharge above confluence with Goathorn Creek, and Goathorn Creek below confluence with tributary receiving discharge); projected water quality from baseline through to post-closure; and updated figures from the WLBM report (Fig 2.2-2.4 of App 4.3) that showed incorrect connections of the three creeks (Four Creek, Tenas Creek, Goathorn Creek).	As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans.
OW-041	NEW	Appendix F, Section 4.18; "Final EA Water and Load Balance Report"(could not locate, not reviewed)	Water and Load Balance Model Have a QP add additional model nodes to represent conditions at: • Tributary receiving discharge above confluence with Goathorn Creek • Goathorn Creek below confluence with tributary receiving discharge and provide WQ results for these nodes	We are unable to find the documents containing the results of this IR response, "Final EA Water and Load Balance results", or Attachment IR 356-1 as the IR response does not provide further information regarding where these documents are located. We are unable to find any documents with that name in the review materials provided to us and therefore could not review the IR. Please provide these documents, including figures for each of the requested scenarios in the IR (Tributary receiving discharge above confluence with Goathorn Creek, and Goathorn Creek below confluence with tributary receiving discharge); projected water quality from baseline through to post-closure; and updated figures from the WLBM report (Fig 2.2-2.4 of App 4.3) that showed incorrect	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Please refer to Attachment OW-038-1 for the Updated Water and Load Balance Model report (SRK, 2025) and refer to Attachment OW-040-1 for Updated Figures 2-2 through 2-4 with corrected connections for Four, Tenas, and Goathorn Creeks. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				connections of the three creeks (Four Creek, Tenas Creek, Goathorn Creek).	
OW-042	NEW	Appendix F, Section 4.18.2; Attachment IR 515-3 (not reviewed), "Final EA Water and Load Balance Report"(could not locate, not reviewed)	Water and Load Balance Model Have a QP clarify if the background water quality inputs used in the model were annual median values or if monthly (or seasonal) median values were used. If so, provide values and ranges. If not, rerun models to do so	Reporting the use of different time scales is troublesome, especially in a region with high seasonal variability. The caching of all "open water" months into one "summer season" is not appropriate as there are very different climate and ecosystem processes influencing or influenced by spring vs summer vs fall water quality dynamics. The use of one seasonal value may be skewed by over-represented high or low values that occur during more months, and therefore not representative of periods exhibiting seasonally low or high values. Monthly values would be more appropriate to capture full seasonal variability. Please provide this information. In addition, we were unable to fully review this IR because we could not locate the referenced document "Final EA Water and Load Balance Report". Please provide this information.	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. TML agrees with the reviewers that seasonal background baseline parameter concentrations may be skewed by specific months within the baseline dataset that is available. However, some months contain only a few datapoints (3), which is the minimum statistical sample size from which to calculate representative percentiles for each month, for each parameter and within each creek. However, to investigate an answer this IR and as the minimum sample size of 3 was achieved for all months, monthly seasonal background baseline concentrations were modelled for each parameter used in the model (see Attachment OW-42-1) and compared to the seasonal background baseline concentrations used in the Final EAC Project Case (2024). Model results from the two scenarios were also compared to the BC water quality guidelines applicable for each stream. As suggested by the information request, the use of background monthly averages rather than background seasonal averages increases the modelled variability in the modelled results for the receiving environment. Table 1 4 shows maximum monthly modelled results that exceeds the water quality guideline calculated for the respective creeks for both model cases

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					(seasonal background concentrations [Final EAC Project Case 2024] and monthly background concentrations). In both cases, dissolved cobalt exceeds in Four Creek as the main load of cobalt to the creek is coming from the Project. Similarly for both cases, dissolved copper was modelled to exceed water quality guideline in Tenas and Goathorn Creek. Total aluminum only exceeds the water quality guidelines under the monthly background concentration case in Four, Tenas and Goathorn Creeks. Similarly, total iron and total beryllium also exceed water quality guideline in Tenas and Four Creeks, respectively. Both dissolved copper and total aluminum are naturally elevated in the background baseline dataset and are often found in exceedance of the BC Water Quality Guidelines, as highlighted by the baseline study. The water quality model results that use monthly or seasonal background concentrations indicates that the load coming from Project represents often a few percents only (<5%) of the total load for the parameters that exceed water quality guidelines in the creeks and rivers. Therefore, the effluent from site is not expected to cause any measurable increase in the naturally elevated background concentrations. Note that total Beryllium was further examined, and it was determined that the indicated exceedances are due to higher detection limits (0.0001 mg/L to 0.0015mg/L) that are close to or above the water quality guideline for total beryllium (0.00013mg/L). These elevated detection limits are biasing the results and showing artificial exceedances. In fact, beryllium concentrations was never measured above detection limit in the baseline dataset and no beryllium load comes from site.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					The parameters listed in Table 1 4 have already been identified as Parameters of Concerns in the BAT assessment (except for total beryllium, which is always below the analytical detection limit). Therefore, options for removing these constituents from site water before it is discharged have already been evaluated and TML has committed to implementing the recommendations made in the BAT assessment. TML has also committed to continue developing the water quality baseline dataset to improve the characterization of monthly/seasonal conditions such that a greater range of background conditions could be incorporated in the next revision of the WLBM during permitting. The monitoring program proposed will have reference sites above where the Project is expected to have any effects and naturally occurring monthly exceedances at these locations will be able to be understood in the context of measured values downstream where the Projects is expected to have an influence on parameter concentrations. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to water quality into Project design, monitoring, mitigation, and adaptive management plans.
OW-043	NEW	20241115 TML Water Quality IR Response-posted.pdf (pages 5-8);	Water and Load Balance Model Table 6.2-1 of the Discharge Management Plan lists many surface discharges that are not	The organization of various ponds and their connectivity, as well as the lack of data associated with each pond is an obvious source of confusion in the application. This theme arises in many comments throughout the proponent’s IR	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Attachment OW-043-1 provides the map of Sedimentation ponds

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Appendix F, Section 4.5	incorporated into the WLBM. For all other discharges, indicate where each is characterized in the Application including water quality predictions, discharges, mitigations, and residual effects	response. Discharges from sedimentation ponds (excluding Tenas Control Pond/North Management Pond and Rail Infrastructure Pond) are directed towards natural ground. The Proponent plans to convey this water along natural flow pathways to eventually reach downstream watercourses. Despite use of pumps and other structures for controlled release, there is risk of overflow and higher amounts of release during high rain events, which may increase downstream erosion potential. The Proponent must provide a clear map of the location and connectivity of each pond along with an associated table that includes all the requested information from the IR.	not included in the Final EAC Project Case (2024) Water and Load Balance Model as requested and demonstrates that the sedimentation ponds are not readily connected to one another nor the Tenas Control Pond/North Management Pond. Attachment OW-043-2 provides the modelled water discharges, water quality predictions, operational period, mitigations, and residual effects associated with erosion and sediment control for the sedimentation ponds not included in the Final EAC Project Case (2024) Water and Load Balance Model. TSS is not modelled from any pond but rather is a source control design requirement of each pond (ponds have been designed large enough for expected material) so that no pond will release higher than an average of 35 mg/L during a 1 in 10 year storm event at the end of pipe and survive a 1 in 200 year event as required by the regulations. By the time this water reaches an actual water course via overland route through vegetation the TSS levels will be much lower than end of pipe levels thanks to natural attenuation by vegetation along the discharge route. The sedimentation ponds are 100% controlled by pumping to a velocity reducing non-erosional structure like a concrete box which will slow water flows to a level that can then flow into the armored emergency spillway which reduces flows even further through the spillway itself. Water then flows to an apron discharge structure that finally discharges to the surrounding environment to ensure water velocities do not cause erosion in the receiving environment.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					As a contingency to potential erosion and sediment control, a risk assessment will be performed with the OW for the likely discharge path for overland flow and if additional erosion sediment control measures are identified to be added such as silt fencing, ability to place floc blocks in storm events will be incorporated. This can be done immediately. If during this review, the engineered discharge system and/or sedimentation ponds also require modification to further reduce potential erosion and sediment control these can be completed. Another contingency will be the ability to install pump back systems in these sedimentation ponds to divert flows to the Tenas Control Pond, if necessary, where TSS levels are expected to be addressed by the large settling time available in this pond plus contingent flocculation/coagulation facilities which again can be done immediately. A final contingency would be secure an active mechanical system that can treat higher TSS inflow water to meet regulatory guidelines which again be done quickly as these systems are readily available within the province. Telkwa Mining will provide an updated discharge management plan during the permitting process for OW and regulatory agencies to review and provide feedback on. During the permitting process, Telkwa Mining will provide detailed plans for the required EMA authorization applications including discharge management plans for the OW and regulatory agencies to review and provide input. As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					additional sedimentation ponds to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-044	NEW	Appendix F, Section 4.53	Water and Load Balance Model Follow up comment to above: The discharge of effluent from sedimentation ponds to the receiving environment does not follow best management practices. Erosion resulting from the discharge has the potential to increase the primary POPC (TSS) to receiving water. The cumulative effects of these additional discharges to the receiving environment have not been accounted for in the IDZ study and need to be quantified.	Note that an IDZ will not be considered during permitting without an adequate BAT assessment. Given that a new BAT assessment has been performed with alternative treatment options, the IDZ study would need to be redone to account for water quality differences derived from various different treatment options. The comment does not address the need to also evaluate cumulative effects around the IDZ. In addition, the proposed frequency of monitoring for exceedances is inadequate given the risk to downstream fish. These ponds will be monitored monthly to evaluate toxicity results against authorized limits for lethality of Rainbow Trout. If exceedances exist, a number of actions are proposed to reduce exceedance, but given the frequency of monitoring (monthly) and the amount of time required for implementation of the proposed actions, it is possible exceedances (and downstream negative effects) could persist for a substantial amount of time (months) before any resolution. This presents a considerable prolonged threat to fish and ecosystem health. TML must correct these discrepancies.	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-044-1 for the Updated 2025 IDZ report (SRK 2025e). The report updates the IDZ assessment based on latest findings of Best Achievable Technology (BAT) assessment and updated effluent discharge information from the Water and Load Balance (WLB) model for the Project (Attachments OW-038-1 and OW-038-3). The assessment was carried out following the Technical Guidance 11 (TG11) produced by the BC Ministry of Environment and Parks. The IDZ is in Goathorn Creek below the confluence with a tributary that receives Project discharge from the Tenas Control Pond (TCP) and North Management Pond (NMP) during operation and post closure, respectively. This also includes discharge from the sewage treatment plant during operation. Three cases were defined based on conservative assumptions considering the in-stream flow and water quality of Goathorn Creek, and discharge rate and quality of Project effluent, using a combination of monthly maximum or average water quality concentrations with typical source terms along with mean flow or 7Q10 low-flows during effluent release period (OW-044-01), according to the following Table 1 5: Parameters identified as POCs in the BAT assessment and considered in this study are listed below: § Nitrogen Nutrients: Nitrate, Nitrite

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					§ Sulphate § Metals: Aluminum (total), Cobalt (dissolved), Copper (dissolved), Iron (total), Nickel (dissolved), Zinc (dissolved) § Oxyanions: Molybdenum (total), Selenium (total). The modeled water quality of each POC in the Goathorn Creek was compared with the IDZ evaluation criteria for flow occupied within the IDZ and its length and width, based on TG11 guidance. For the worst case, nitrite and selenium do not meet WQG after complete mixing and aluminum exceeds the IDZ criterion for 100 m length during operation, while aluminum and selenium do not meet WQG after complete mixing in post-closure. This case is very conservative and unlikely to occur during very dry periods. Emphasis was placed upon the reasonable worst case and the expected case, which are conservative but provides realistic evaluation scenario. The results are summarized below. During Operation: - IDZ criteria to meet applicable WQGs are satisfied for nitrate, nitrite, sulphate, aluminum, cobalt, iron, nickel, zinc and molybdenum for the reasonable worst and expected cases. - The IDZ extent of selenium exceeds the TG11 guidance (100 m length) for the reasonable worst case (153 m length), but meets the guidance for the expected case. WQG is exceeded for dissolved copper due to background concentration higher than the WQG, but the effluent concentration reaches background concentration after complete mixing. During-Post Closure: - POCs including nitrate, nitrite, cobalt, molybdenum, nickel and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					zinc do not register an IDZ, as the effluent concentrations are below the corresponding WQGs for the IDZ cases. - IDZ criteria based on TG11 guidance is met for sulfate, aluminum, iron and selenium for the reasonable worst and expected cases. The guidance is exceeded for dissolved copper with background concentration higher than the WQG, but remains close to the background level after complete mixing. The analyses of this study provided a range for spatial extent of IDZ for conditions anticipated for worst to expected cases as outlined in TG11. Based on the reasonable worst case and the expected case, a minimum IDZ length of 153 m and 44 m would be needed during operation and post-closure, respectively, to meet the instream WQGs of the POCs. While there are other potential treatment options provided in the BAT (Attachment OW-038-3) these are only contingencies. The Final EAC Project Case (2024) does not have any parameter exceedances beyond the edge of the dilution zone besides baseline parameters that are already in exceedance. If in the future monitoring and the trigger action response plans indicate that a water treatment contingency needs to be implemented, a revised IDZ will be submitted as part of the notification for construction. As illustrated by Attachment OW-043-1, the sedimentation ponds are not part of the WLBM and do not contribute to cumulative effects within the IDZ in Goathorn as their flows are either not directed towards Goathorn Creek's IDZ area or the pond is not operational when discharge is occurring from the Tenas Control Pond or from the North Management Pond.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Furthermore, the sedimentation pond flows not included in the Project's WLBM are orders of magnitude lower than what is expected from the Tenas Control/North Management Pond. Finally, the ponds have been designed to not exceed a maximum average TSS concentration of 35 mg/L at the end of pipe. Final Permit documents from the government will provide the required frequency of monitoring and what parameters need to be measured when the ponds are both flowing or not flowing. As a contingency to potential erosion and sediment control a risk assessment will be performed with the OW for the likely discharge path for overland flow and if additional erosion a sediment control measures are identified to be added such as silt fencing, ability to place floc blocks in storm events these will be incorporated which can be done immediately. If during this review, it is identified that the engineered discharge system and/or sedimentation ponds also require modification to further reduce potential erosion and sediment control these, these modifications can be completed. Another contingency will be the ability to install pump back systems in these sedimentation ponds to divert flows to the Tenas Control Pond if necessary where TSS levels are expected to be addressed by the large settling time available in this ponds. Additional contingent flocculation/coagulation facilities will also have the ability to be done immediately. A final contingency would be secure an active mechanical system that can treat higher TSS inflow water to meet regulatory guidelines. TML will provide an updated discharge management plan during

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					the permitting process for OW and regulatory agencies to review and provide feedback on.
OW-045	NEW		Selenium Data Have a qualified professional identify lentic areas in the receiving environment which may receive selenium from mine operations, and ensure that background concentrations of selenium in water, sediment, invertebrate, and fish tissues are collected and compiled in those lentic areas.	The concern here is sedimentation and conversion of selenium species, so there may be opportunities for this in micro-lentic environments such as back channels and pool environments along the stream course, but according to the proponent in this local study and regional study region there are no lentic environments.	Telkwa Mining acknowledges that the comment is closed, and no further response is required based on the OW information.
OW-046	176	20241115 TML Water Quality IR Response-posted.pdf (pages 20-30); Appendix I (all)	Alternative Treatment Options Provide conceptual design of alternative treatment options, mitigation measures, and management structures that can prevent the discharge of water that is not suitable for release to the environment (e.g., does not meet BC WQGs or	However, there are no actual plans or outcomes developed that describe how the water treatment facility would be designed or operate, some of the benefits are based on assumed targets met through treatment. This is acceptable but should be fleshed out further, and it should be confirmed that these targets can actually be met if this is considered a feasible option. The Proponent is also assuming the water quality treatment would persist past the end of closure as the model shows results out to 2100. Additional information on water treatment facility is	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from Office of the Wet'suwet'en memo, SRK June 2025] Attachment OW-011-1. Water treatment methods for reducing selenium and nitrate-nitrite were considered in the BAT assessment (Attachment OW-038-3) and include either an active In-situ gravel bed reactor (GBR) or anaerobic moving bed bioreactors (MBBR). The operation of a GBR is described in the BAT assessment report. A GBR is a pond or reservoir that has been backfilled with coarse rock/gravel, covered by an insulating layer (soil and/or organics)

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			another objective established by BC ENV)	needed (design, standards, operation and duration) and should not be assumed if this is considered as an option, in conjunction with other mitigation strategies (it is included on the list of combined best options). There are also effects on streamflow in Four and Tenas Creek, which should be explored more with the water load balance model. Goat Creek was not included in the model outputs, although this is acknowledged by the authors. Impacts on Goat Creek should be included in additional assessment of further mitigation strategies.	and fitted with injection and extraction wells. The operation of a GBR is illustrated in Figure 1 3. Mine water flowing to the injection wells is dosed with a source of easily degradable organic carbon such as methanol or glucose and other nutrients as required. Inside the GBR, microorganisms degrade the organic carbon. For the Tenas Project, the GBRs would be constructed within the water management ponds using the rock that is already planned to be placed and submerged in the ponds. The treatment system would be operated by pumping mine contact water to the injection wells and dosing the water with a source of organic carbon (shown as amendment delivery system in Figure 1 3). The degradation process of carbon consumes oxygen and oxidizes species such as nitrate, ferric iron (Fe3+), selenate (SeO42-), and sulphate (SO42-) and produces reduced constituents such as ferrous iron (Fe2+), selenite or elemental selenium (SeO32-, Se0) and sulphide (S2-). Sulphide can form insoluble precipitates with dissolved metals such as copper, lead, cadmium, nickel, and zinc, which will be removed in the process. These precipitates will be permanently kept below water at the bottom of the management ponds and are not expected to re-enter the environment due to redox conditions presents. The mining industry is in the second decade of adopting GBRs. A full-scale GBR with a treatment capacity of 20,000 m3/day has been constructed at the Rainy River Mine in Ontario and currently operates as primary water treatment for the removal of copper and nitrate. At two coal mines in the Elk Valley in BC, saturated

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					rockfill reactors (SRFs) – a variant of GBRs – are currently used to remove selenium and nitrate from mine water. Figure 1 5 shows a simplified schematic of an anaerobic MBBR process. Feed water is pumped to the anaerobic bioreactor where organic carbon and nutrients are added. The bioreactor provides sufficient residence time for anaerobic microbes to degrade the organic carbon and complete the reduction process. A post treatment stage consisting of an aerobic bioreactor that removes residual organic carbon and reduced species produced by the anaerobic bioreactor (such as sulphides) treats the effluent from the anaerobic bioreactor. A solid-liquid separation step such as a clarifier, pond and/or filter may be required to remove residual biosolids. From the post treatment stage, the treated water flows to an effluent tank and from there it is discharged to the receiving environment. Anaerobic bioreactor processes are common and conventional processes for removal of selenium and nitrate from mine water. For nitrate removal, it is the only process in common use. If anaerobic biological treatment were to be implemented for the Tenas Project, both nitrate and selenium would be targeted by the process. However, conventional anaerobic biological treatment would likely not be able to remove the selenium concentrations in untreated effluent that are generally modelled to be less than 0.020 mg/L and often less than 0.010 mg/L. Anaerobic biological treatment can generally only be relied upon to achieve a selenium concentration of 0.010 mg/L. Therefore, a membrane filtration stage would be required to pre-concentrate

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					the untreated discharge before it is treated by the anaerobic biological. For the Tenas Project, the MBBR process would be operated by pumping mine water from the Tenas Control Pond directly to the treatment plant and then discharging the treated water. The assumed water treatment performance is based on knowledge of treatment processes that operate at similar sites. Therefore, both the estimates or assumed performances of the treatment processes and the limitations and potential risks associated with treatment processes are based on real-life examples and are therefore reliable for deciding what treatment processes or Best Management Practices are likely to be most suitable for the Tenas Project. However, as discussed in the BAT report (Attachment 6), estimated treatment performances must be verified by site-specific tests. Therefore, a key recommendation, which was adopted by TML, is to initiate pilot trials on site to verify the assumed performance of the selected treatment processes. The updated water quality model scenario that evaluated water treatment options did assume that water treatment would continue until year 2100. However, the updated water quality model results shows that there would be no exceedances of water quality guidelines in the receiving environment even if no treatment is used during the mine’s operations and post-closure phases. The detailed design information requested by in the review comment will be provided as part of permitting for the two contingency options recommended by the BAT. Detailed design

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					is outside the requirements of an environmental assessment. Implementation and operation of an active water treatment systems will be based on a trigger action response plan developed during permitting. The trigger action response plan will identify appropriate early trigger concentrations or concentration trends in the end of the pipe discharge, in the management and control ponds, and groundwater seepages that will cause TML to begin implementing and operating the treatment systems. The highest rank options are to continue with the existing Base Case with Best Management Practices incorporated (Final EAC Project Case [2024]) or implement an active In-situ GBR in the management ponds. TML has committed to developing a pilot active In-situ GBR in the CPP Sedimentation Pond or alternate pond to improve this technology's TRL to at least an 8 for the targeted Parameters of Concern prior to the end of Year 4 of the Operation Phase. As discussed above, in 2025, two studies were completed that evaluated the effects of implementing best management practices and best achievable water treatment technologies (SRK 2025d - Attachment OW-038-2; SRK 2025c - Attachment OW-038-3). Both studies made use of updated water quality model results that included potential effects on streamflow in Four and Tenas Creek and potential effects on Goathorn Creek was also included in the model assessment – see Attachment OW-038-2 for direct impact on Goathorn streamflow. As requested by the OW, Telkwa Mining will discuss appropriate

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					incorporation of the results of forthcoming information related to additional sedimentation ponds to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-047	154, 157, 161	App Pa- Memo Geoscience IR_round2_respon ses SRK.pdf (pages 17-18)	Water Quality Modelling 1. Prepare a sensitivity within the WLBM to evaluate how a 4-meter thickness of PAG rock left exposed in a management pond during a period of early closure would affect water quality.	We are concerned that the Proponent dismissed this request saying that under properly managed scenarios this would not be a concern. However, it doesn't provide information on the effects of exposed PAG to water quality under scenarios where the management pond techniques fail, such as failure of a pond dam or failure of the pumping system to work as designed. The Proponent must provide this information and include scenarios in the water quality model for estimating impacts where management actions fail, to provide a clear picture of the downstream impacts of PAG under less-than-ideal conditions, but conditions that could possibly occur if there are situations where proper management cannot occur (failure of pumping system or pond dam, or some other instance where a 2m cover of water cannot be maintained).	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from Office of the Wet'suwet'en memo, SRK June 2025] Attachment OW-011-1. Under typical operations, SRK has tested a variety of climate conditions to verify whether water cover could be maintained during operations and in closure through Water and Load Balance Modelling (Attachment OW-038-1). Of note, a scenario considering 3 consecutive 1/200 dry year were applied in the WLBM during the years when water demand is highest (2040-2043). The higher water demand is due to the highest volume of PAG being placed in the West Management Pond during that period and the water is needed to fill the voids contained in the PAG. Water cover under this scenario could be maintained during that time at 0.5m, which was deemed acceptable for operational purposes (higher amount of water covering the PAG layer would prevent safe PAG dumping in the management pond), and up to the maximum water level of 1.0 m. Another scenario considered stochastic climate conditions throughout the life of mine and in post-closure to also test whether water cover could be maintained. Results show that water cover could be maintained throughout operations and in long-term closure (see results in Attachment OW-038-1).

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					In addition to water balance modelling under relevant climate scenarios, other contingencies exist that would allow to maintain water cover in the ponds: - Water contained in Tenas Control Pond (operating capacity up to 850,000m3 with an additional contingency storage of 210,300 m3 to manage large storm events) can be used to top up any management pond that would need it instead of discharging during the open water season (May until October). - Seepage from the Pit during operations can be redirected to a different management pond when needed. - Channel 02 (C02) capturing unimpacted runoffs North of the backfill could be redirected to any management pond were it needed. - Water contained in the voids from the NAG/OVB cover (above the PAG layer) in the management ponds can be pumped to other management ponds when needed (volume of water for NMP, EMP and WMP is 0.840, 3.7 and 7.6 million m3 respectively). In case of a pump failure, similar contingencies will be relied upon for the relatively short period of time (likely no more than a few days) it would take to repair or replace the pump, including: - Gravity seepage from backfill (instead of pumping) can be established to provide extra water cover for any of the active management pond (i.e. management pond with active PAG placement) - Channel 02 can be redirected by gravity to EMP, which in turn can overflow into NMP - The Project will operate a network of pumps for conveying water between all three management ponds, which adds redundancy

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					to the system. In a worst-case scenario, where a pump would have to be replaced and if a spare pump is not kept on site, a rental pump could be mobilized to site in less than one to two weeks. A lack of pumping for such short durations would not lead to the loss of water cover in any of the management pond below the PAG level. This was illustrated by Figure 1 5 (scenarios with or without pumping from TCP to WMP, which requires the most amount of water to fill PAG voids), which shows that even without pumping from TCP, water cover can be maintained in WMP. Dam breaches are very rare occurrences, but plans need to be in place in the very unlikely event that it happens. A dam breach is an extremely serious event that can be extremely hazardous to personnel and the environment. That said, the risk associated with a detrimental increase in loadings from PAG materials temporarily exposed following a dam breach is very low to negligible, for the following reasons: § Following a dam breach, priority would be given to repairing the breach and restoring the function of the dam. There is no credible scenario where this would not occur. § Metal leaching from exposed PAG material is similar to exposed non-acid generating (NAG) material until the PAG begins to produce acid rock drainage (ARD). § For the PAG material excavated at the Tenas Project, it is estimated that material must be exposed for 3 to 5 years before any ARD begins to develop. § There is no credible scenario where PAG material would be left

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					exposed for over 3 years following a dam breach to generate ARD. Therefore, such a scenario will not be modelled. § Permit conditions that state that PAG must not be exposed to air for more than a given number of months (six months, say) are common and such conditions are enforced by Provincial regulators. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to additional sedimentation ponds to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-048	154, 157, 161	Appendix E of Appendix 4.3-A	Water Quality Modelling 2. Provide a sensitivity in the water quality model to allow PAG exposures on pit walls to understand how exposure of PAG may affect downstream water quality.	We were unable to review this IR responses as we were unable to find the supporting information. Please provide this information.	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. The sensitivity requested in the IR# 154-2 included the following request: IR 154 b): “Provide a sensitivity in the water quality model to allow PAG exposures on pit wall to understand how exposure of PAG may affect downstream water quality.” A model sensitivity scenario was developed in this response to address this IR and is described below. Introduction In the current mine plan, pit walls are proposed to be covered

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					gradually as mining progresses. It was determined that the only probable scenario where pit walls remain uncovered would be if mining stopped unexpectedly. In the unlikely event that mining stops during operations, it is plausible that some of the pit walls would be exposed for an extended period. Geochemical testing (SRK 2024c) indicates that several of the rock units exposed in the pit walls are potentially acid generating (PAG) and will produce acidity when all of the neutralizing minerals (e.g., carbonates) are consumed. Acidic drainage from the pit walls could therefore develop if they are left uncovered and the wall rock continues to oxidize. A conservative model scenario was developed considering operations to stop at the end of the construction of the East management Pont (EMP – Year 8 in the mine plan), as it represents the largest exposed pit wall surface area that would remain exposed if no other mitigation measures were implemented prior to the unplanned cessation of operations. It was assumed that it would take 15 years to resume operations and all pit wall surfaces that were not covered prior to Year 8 would remain uncovered during this period. If mining stops at that time, a pit lake would start forming in the backfill collecting different inflows including the runoff from meteoric water flowing over the uncovered pit wall areas. The following subsections describe the geochemical conceptual model, model development and the water quality results for the geochemical pit lake model. Pit Lake Geochemical Conceptual Mining of the Tenas Project will result in open pit walls that are exposed to atmospheric oxygen, which would continue to occur if

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					they remain uncovered due to mining stopping unexpectedly. When exposed to oxygen, sulfides that are present in the open pit wall rock will oxidize according to reaction 1 (Rxn 1) producing sulfate, acidity, ferrous iron, and release of trace chalcophile elements. $\text{FeS}_2(\text{s}) + 7/2 \text{O}_2(\text{g}) + \text{H}_2\text{O}(\text{l}) \leftrightarrow \text{Fe}^{2+}(\text{aq}) + 2\text{SO}_4^{2-}(\text{aq}) + 2\text{H}^+(\text{aq}) \text{ (Rxn 1)}$ Under oxidizing conditions, ferrous iron liberated during sulfide oxidation will subsequently oxidize to ferric iron in neutral pH producing additional acidity according to the following reaction: $\text{Fe}^{2+}(\text{aq}) + 1/4 \text{O}_2(\text{g}) + 2 \text{H}_2\text{O}(\text{l}) \leftrightarrow \text{Fe}(\text{OH})_3(\text{s}) + 2\text{H}^+(\text{aq}) \text{ (Rxn 2)}$ Although oxidation of mine rock for the Tenas Project will release acidity, acidic conditions are not predicted to occur immediately since these materials also contain carbonate minerals that will neutralize the acid according to the following reactions: $\text{CaCO}_3(\text{s}) + \text{H}^+(\text{aq}) \leftrightarrow \text{HCO}_3^-(\text{aq}) + \text{Ca}^{2+}(\text{aq}) \text{ (Rxn 3)}$ $\text{CaCO}_3(\text{s}) + 2\text{H}^+(\text{aq}) \leftrightarrow \text{H}_2\text{CO}_3(\text{aq}) + \text{Ca}^{2+}(\text{aq}) \text{ (Rxn 4)}$ Depletion calculations (SRK 2024c) indicate that the lag times to acid generation are on the order of years (>5 years based on the average bulk rock properties). The lag time to acid generation prediction based on HCTs was confirmed by the barrel testing results. Barrel 6, which is a composite sample of rock from Zones 6 and 7, became acid generating in October 2023, four years after the barrel program was initiated. SRK (2024c) indicated that these zones were non-PAG based on their average bulk geochemical properties. However, the weighted barrel 6's NPR (0.5) was more closely aligned with the minimum and P5 NPR

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					observed for these zones (see Table 4 in SRK (2024c)). The lag times to the onset of acid generation based on the Zone 6 and 7 minimum NPRs ranged from 3 to 5 years. To provide a conservative prediction of pit lake water quality, onset of acidic conditions of pit wall PAG rock was assumed to commence in Year 4 of the model. Once mining stops, a lake will form as the pit fills with water, which will reduce the exposure of pit walls to atmospheric oxygen. Submerged wall rock will become isolated from atmospheric oxygen minimizing oxidation of inundated wall rock. A high wall will exist above the pit lake composed of approximately 30% of PAG-rock which will be acid generating once acid neutralizing minerals are consumed; the remainder of the pit walls are composed of non-PAG rock and overburden. It is assumed that the overburden and the non-PAG rock will be weathered containing limited sulfide and will not produce acidic conditions. Soluble oxidation products will be flushed from exposed open pit wall surfaces in the high wall by meteoric water contacting and mix together with other inflows (e.g., groundwater inflow) in the pit lake (Figure 1 6). If the pit lake remains alkaline, several secondary mineral species will become supersaturated in the pit lake and precipitate from solution. Sorption of other element species will also occur which can also limit concentrations of these constituents. If the lake becomes acidic, the solubility of several dissolved species (e.g., sulfate) will increase. Mass will also be lost from the pit lake through advective outflows.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Geochemical Pit Lake Model Development and Inputs A geochemical model was developed in the publicly available speciation and mass transfer code PHREEQC v.3 (Parkhurst and Appelo 1999) to evaluate pit lake water quality if mining stopped at the end of the PAG placement in the East Management Pond (EMP) in 2029. It was assumed that it would take 15 years to resume operations and all pit wall surfaces that were not covered prior to Year 8 would remain uncovered during this period. Water balance modelling indicates that a lake will form in the mined-out pit if operations were to cease in Year 8 of the mine plan. Based on an average climate scenario, the open pit will require 15 years to reach its maximum storage capacity of 34 Mm3 from pit wall runoff, groundwater inflows, direct precipitation, and other upstream catchments such as non-contact runoff and backfill seepage. Once the pit lake has reached its maximum water storage capacity, approximately 450,000 m3/year is modelled to discharge to the West Management Pond, which eventually would discharge to Goathorn Creek on top of the regular discharge from the Tenas Project. The geochemical model was developed to account for mixing of water flowing over the different zones of the pit walls, as well as the mixing of different water sources within the pit lake (e.g., groundwater inflows, etc.) The following assumptions were included in the water balance model to simulate these conditions: Catchments in the water balance model (SRK 2025b) for 2029 (Year 8) were assumed to be constant for the remainder of the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					scenario simulation, as mining is assumed to have stopped. Water from the Tenas Control Pond and the unimpacted catchment captured by the channel C02 around the East Management Pond would be diverted towards the pit lake during freshet, instead of into Four Creek, to expedite flooding of the pit to minimize oxidation of exposed wall surfaces. Groundwater inflows were considered constant based on prior groundwater modelling (SRK 2024b). The water quality model was set up using annual timesteps over the shut-down period of 16 years. At each timestep, inflows to the pit were assigned a source term water quality and mixed based on their relative proportions using Equation 1 (EQ1): $C_{lake} = \frac{(V_{lake,t_i} \times C_{lake,t_i}) + \sum_{i=1}^n [Q_i \times C_i - C_{lake,t-1} \times Q_{out}]}{(V_{lake,t_{i+1}}) - E_{lake,t_i}} \quad \text{Eq 1}$ Where: Clake: predicted concentration in the pit lake Vlake, ti: volume of the pit lake at time i Vlake, ti+1: volume of the pit lake at the subsequent timestep Elake, ti: evaporation from the pit lake at time i Ci: concentration of each inflow to the pit lake at time i Qi: inflow volume to the pit lake from input source i Clake,t-1: concentration of the pit lake at the previous timestep Qout: outflow from the pit lake Following mixing, supersaturated mineral phases were identified and selected for equilibration in the model based on commonly observed secondary mineral phases at mine sites (SRK 2024a). Sorption to ferrihydrite was considered using the default values of Dzombak and Morel (1990) which may limit parameters that

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					form oxyanions (e.g. arsenic and selenium) and other trace elements from persisting in solution, should ferrihydrite precipitate in the pit lake. The lake was assumed to be fully mixed and in equilibrium with the atmosphere under oxidizing conditions. To account for this in the model, the redox potential (Eh) was fixed at 550 millivolts (pe=10). After each timestep, the solution was saved and brought forward to the next timestep as the input for existing lake chemistry. Exposed wall rock surfaces will produce oxidative load that will be flushed by meteoric water. An annual wall drainage water quality was estimated by calculating the mass released from each stratigraphic zone using Equation 2: $C_{j,t} = (L_j \times M_t) / Q_t$ Eq 2 Where: C_{j,t} is the concentration of parameter j at time t L_j is the scaled field barrel release rate of parameter j M_t is the cumulative reactive mass of rock exposed along pit walls at time t Q_t is the volume of water in contact with the pit walls at time t prorated to the surface area of each zone The predicted water qualities for each stratigraphic zone were subsequently mixed in their relative proportions determined based on the site wide water balance model. As noted above, SRK (2024c) indicates that PAG rock will produce acidity after neutralizing minerals have been consumed by acid produced through sulfide oxidation. The timing to onset of acidic conditions

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					is dependent on the available neutralization potential and rock sulfide concentrations and is variable by zone (see SRK 2024c). In the wall rock runoff source term derivation, all PAG zones were assumed to become acidic after four years. This represents the minimum time to acid onset for the average bulk properties of PAG rock in Zone 4 (SRK 2024c) and provides a conservative estimate of the wall rock runoff since the timing to the onset of acidic conditions is longer for all other stratigraphic zones and these are therefore assumed to become acidic much sooner than they would in reality. The predicted wall rock annual concentrations using Equation 2 were subsequently equilibrated using the geochemical modeling code PHREEQC to evaluate if the concentrations would be constrained through precipitation of secondary minerals and adsorption surfaces. The model was set up to calculate water quality for the following constituents: General Chemistry: pH, alkalinity Major Ions: calcium, magnesium, sodium, potassium, sulfate, chloride Trace Elements (dissolved): aluminum, antimony, arsenic, barium, boron, cadmium, chromium, cobalt, copper, iron, lead, lithium, manganese, mercury, molybdenum, nickel, phosphorus, selenium, strontium, thallium, tin, uranium, vanadium and zinc. Total metals concentrations were calculated based on the assumption of a maximum TSS discharge of 35 mg/L (SRK 2024a and SRK 2025b), and proportions of TSS comprised by various elements based on whole rock analysis for non-PAG and PAG rock. Total element concentrations were calculated by adding

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					dissolved and particulate concentrations. The following additional inputs and assumptions were included in the pit lake geochemical model: A damaged rock zone depth of 2m and a fracture frequency of 10% was used to calculate the reactive mass from blasted surfaces. A damaged rock zone depth of 0.1m and a fracture frequency of 10% was used to calculate the reactive mass load from free dig areas. Water balance model flows recharging the pit lake (i.e., direct precipitation, pumped flows from TCP, unimpacted catchment runoff from channel C02) were based on an average climate scenario (SRK 2025b). Yearly average water quality model results for Tenas Control Pond (in 2029) (SRK 2025b) were used to represent the quality of water pumped from the Tenas Control Pond to the pit lake. Background surface water and groundwater quality for unimpacted catchments and groundwater inflows (SRK 2025b), respectively, were used to represent the quality of these sources to the pit lake. Backfill inflow and load were not considered in this scenario as it was considered insignificant (no seepage yet from backfill, and small amount of rock volume in backfill) Load from talus on the pit benches was not included in the model. An alkalinity of 75 mg/L was assumed for non-PAG rock pit wall runoff, as well as for the Tenas Control Pond and C02 inflows. The fully-mixed equilibrated concentrations were modelled

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					between 2029 and 2045 (16 years in total). Pit Lake Model Results The pit lake model results show that the pit lake water does not become acidic after 16 years, despite the acidification of the PAG zones in the pit wall. This is due to the relatively low contribution of PAG zones (30%) in the total pit wall runoff inflow. Additionally, the proportion of wall rock runoff to other pit lake inflows decreases from 20% to less than 10% as the pit lake floods. After 16 years, concentrations of most parameters begin to reach steady-state. An increase in concentrations of sulfate as well as some metals were observed over the modelled period, such as iron, cadmium, cobalt, dissolved nickel and zinc, due to the acidification of the PAG zones in the pit wall. Other metals decreased over time (e.g. arsenic from sorption to precipitated ferrihydrite). Copper and aluminum also decreased over time, though the decrease in concentrations was less pronounced than for arsenic. pH remained around 8.5 throughout the simulation, with a slight decrease (<0.2 pH units) over time, which would be explained by the acidification of the pit wall runoffs in Year 4 of the Pit Lake model. Trends over time for all dissolved and totals parameter concentrations can be found in Attachment OW-048-1. The predicted pit lake water quality in 2045 (Year 16 of the Pit Lake model simulation) is presented in Table 1 6. Predicted concentrations are compared against water quality guidelines for Goathorn Creek since this will be the tributary the lake will be dewatered to when mining resumes. The following constituents were screened to be parameters of concern (POCs) based on the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					comparison to water quality guidelines in Goathorn Creek (Table 1 6): sulfate, total aluminum, total chromium, dissolved cobalt, total iron, total molybdenum, dissolved nickel, total selenium, total thallium and dissolved zinc. These parameters had been identified previously as POCs in the Best Achievable Technology Assessment (BAT) [SRK 2025d] . The source of these parameters is the acidification of the PAG zones in the pit wall after four years of being left exposed. However, because of the small contribution of pit wall runoff to the total inflows, the pit lake water remains neutral (pH ~8.5) throughout the simulation. Pit Lake Dewatering Evaluation For operations to resume, the pit lake would need to be dewatered. To evaluate the impact of dewatering on Goathorn Creek during the open water season, three different dewatering scenarios were included in mass balance calculations with the following inputs: - Seasonal background 50th percentile concentrations for Goathorn Creek (open-water season [SRK 2025b]) - Water quality model results for the pit lake in 2045 (Year 16). - Pre-mining Goathorn Creek flows calculated by the rainfall-runoff model in the water balance (SRK 2025b) - Four different pit lake discharge rates (4 scenarios) of 5,000, 10,000, 15,000, and 30,000 m3/d during the open-water season (May until October) Model results for the above modelled scenarios are summarized in Table 1 7 to Tabe 1 11, and represent the maximum monthly concentration after mixing with streamflow in Goathorn Creek.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					The model results showed a few exceedances of water quality guidelines in all four discharge rate scenarios, including dissolved cobalt, dissolved copper, dissolved nickel, total selenium, total thallium, and dissolved zinc. Of note, the dissolved copper exceedance is expected to be driven by high background concentrations, as highlighted by SRK (2025c), and the discharge from the pit lake contributes very marginal load to the creek (i.e. less than 1% of load in the stream). The only other exceedance that occurs for all months during the open water season is dissolved cobalt (under the highest discharge rate of 30,000 m3/d), but the remainder of the exceedances are expected in the fall, mainly in September, when dilution capacity is reduced. Detailed exceedances for each month are provided in Table 1 8 to Tabe 1 11 for each discharge rate scenario. These results indicate that a variable discharge rate would be preferred to minimize any exceedances during the open-water season. A detailed discharge management plan would be developed, and the discharge rate at which the pit lake is dewatered would take into account the available dilution capacity in the stream, as well as available contingencies in order to resume Operations. Several contingencies are available to further mitigate these potential exceedances: - Variable discharge rates, with increasing discharge rates during peak based on available dilution capacity in the stream. - Use dilution from other sources, such as water from TCP, as well as unimpacted water from C02 channel to mix with the pit lake effluent to lower the impact of the dewatering discharge from the pit lake into the stream.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					- In the very unlikely possibility that the pit lake became acidic, despite this model scenario results, lime could be considered to manage pH and other problematic metal concentrations. As requested by OW, TML will discuss appropriate incorporation of the results of forthcoming information related to additional Project scenarios to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-049	174	App Pa- Section 2.7 (incorrectly listed under IR 154 and 164); SRK 2022d (Section 2.1 and 4.4)	Discharge management Plan - Calcite Precipitation 1. What are the uncertainty and gaps around the current assessment that calcite precipitation is not expected to occur downstream of the proposed project footprint based on current observations and baseline concentrations? Please describe how the baseline observations and related conclusions relate to the projected load from the mine and propose recommendations to address these uncertainties	1. The response to the IR states that the estimated SI do not suggest calcite precipitation, but detailed discussion is not in the reference. They do not specify what additional monitoring data is required for site-specific calculation of site-specific SIs for calcite. Is TML referring to monitoring data from this post-project operations, or baseline data? It is unclear where in the referenced SRK (2022d) document they specifically address calcite, as the term “calcite” only appears once in the document. TML must update the Discharge Management Plan and provide further information on how operation and a post-closure increase in conductivity in ponds and the receiving environment will affect the SI for calcite and predictions for precipitation. 2. Higher pCO₂ in groundwater will be more likely to precipitate calcite at possible groundwater	Telkwa Mining acknowledges the comment. Please see Attachment OW-049-1. 1. It appears an incorrect reference was provided in the original response since a detailed evaluation of calcite precipitation was documented in SRK (2022) and calcite is mentioned multiple times throughout the intended reference. This documented is titled “Tenas Project – Calcite Precipitation Evaluation” and is provided in Attachment A of Attachment OW-049-1. A detailed discussion of the calculations is provided in Section 3 and a discussion of the receiving environment results is provided in Section 4.4 (Calcite Precipitation Within Receiving Waters) and Section 5 (Summary and Recommendations). SRK (2022) indicated that downstream receptors are theoretically supersaturated with respect to calcite (i.e., SI_{calcite} > 0) but there is no visible evidence of calcite formation in these receptors. This means the site specific SI_{calcite} must be > 0 for calcite to form. A site-specific SI_{calcite} can be used as a predictive value to determine if calcite will form in the future, or

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			and gaps. 2. Please update the calcite conceptual model provided in App 13.5K to included seepage pathways through groundwater or provide a rationale for its omission. 3. Provide clarifications on the mechanisms and likelihood of calcite precipitation in the immediate downstream environment including all pathways (i.e., surface and groundwater) below end-of-pipe discharge location in Goathorn Creek. 4. Provide details of the calcite monitoring and management plan to prevent onset of calcite precipitation downstream of the project discharge and contingency measures to be implemented if specific triggers on the mine site are reached.	seepage locations (contact with atmosphere). Some accounting for this should be included in the conceptual model. 3. Within the referenced SRK 2022d (Tenas Project Water and Load Balance Modeling Report REV1), we cannot find discussion of calcite precipitation, including mechanisms, contributing factors, predictions, etc. The response to the IR states that the estimated SI do not suggest calcite precipitation, but detailed discussion on this topic is not in the reference. According to the IR response, “predictions provided in SRK (2022d) indicate that calcite is not expected to form in downstream tributaries since predicted alkalinity, calcium and magnesium concentrations are like existing conditions”. However, there are multiple examples of increases in alkalinity and magnesium (in particular) in the load model. Therefore, TML must explore conditions in terms of potential for calcite precipitation. 4. There is no plan, other than including calcite in the surface water quality monitoring program. If calcite formation is observed, then they will develop a mitigation plan. This plan will likely include mitigation using antiscalants. The proponent does not discuss this option further but	in other tributaries. A site specific SI calcite can be derived by using surface water quality monitoring results. Monitoring results are needed in multiple locations where calcite precipitation is occurring versus not occurring to converge on the site-specific value when calcite formation occurs. This data becomes available during the operations phase of the Project. 2. SRK agrees that seepage will equilibrate with atmospheric gases when it daylights and this has the potential to result in supersaturation and the precipitation of calcite at these locations. This process is already included in the conceptual model. Please see the third paragraph of Section 2.1 of Attachment A of Attachment OW-049-1. SRK understood the original request was to account for precipitation along the groundwater pathways. In the context of the Tenas project, this is not expected to occur because the groundwater pathways are not in equilibrium with atmospheric gases and based on experience at other coal mines in British Columbia, calcite precipitation occurs after the seepage has equilibrated with atmospheric gases in surface water and not in groundwater. 3. The information requested is provided in the section referenced in response 1 of this information request response. 4. Telkwa Mining plans to develop a calcite monitoring and management plan. The plan will consist of evaluation of saturation indices at downstream monitoring locations during the Operation Phase and visual inspection of streambed sediments for evidence of calcite precipitation. If calcite precipitation is identified, Telkwa Mining will submit Mine’s Act

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				should include considerations and possible impacts and interactions of the use of antiscalant for reducing calcite precipitation considering the high background conditions of aluminum in these watersheds	and Environmental Management Act permit amendment applications to implement treatment to prevent calcite from precipitating. Antiscalant addition to the water entering the Tenas Control Pond is the likely treatment technology as it is currently being used with success at other mine sites in BC. Infrastructure will be present at the Tenas Control Pond for the addition of flocculant/coagulants to react to TSS and this infrastructure will be designed and constructed to also allow for the addition of antiscalant. If treatment for calcite is required, Telkwa Mining will submit Environmental Management Act (EMA) and Mine's Act (MA) permit amendment applications to the Ministry of Environment & Parks (ENV) and the Ministry of Mine's and Critical Minerals (MCM) to use antiscalant. An evaluation of the effects of antiscalant on downstream receptors is a requirement of the permit amendment application. This will include an evaluation of the effect of antiscalant to surface water and the influence of how preventing calcite from precipitating will change dissolved constituents. However, calcite is known to co-precipitate with divalent cations since they substitute for calcium (a divalent cation) in the crystal lattice during mineral precipitation. Aluminum is a trivalent ion and therefore will have a lower preponderance to be incorporated in the calcite. Therefore, treatment of calcite is expected to result in limited changes to aluminum concentrations.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Telkwa Mining will provide an updated discharge management plan during the permitting process for OW and regulatory agencies to review and provide feedback on. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to potential calcite precipitation to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-050	181	Appendix Q Section 2.4.2.2.a	Dam Safety and Analysis b. Indicate what evaluation of possible environmental impacts due to the release of the contents of the North, West or East Management Ponds was used as a basis for selection of Consequence Classification. The environmental impacts should be consistent with the current understanding of the project (PAG tailings, etc.) and include appropriate references to	Given the likelihood of major long-term deterioration of critical steelhead spawning habitat in Tenas and Goathorn Creeks, a 'Very High' risk classification should be used for a breach of the North Dam or Tenas Dam.	Telkwa Mining acknowledges the comment. Please refer to IR response for 181 in Attachment OW-050-1. Telkwa Mining clarifies that all dams have now been reclassified with an "Extreme" risk classification, which is the highest classification available under the Canadian Dam guidelines. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to dam classification to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			the sources of information considered.		
OW-051	498	Appendix L, page 1-2	The Tenas Coal Project does not consider the environmental flow needs (EFN) of these ecosystems	The Project addressed EFN risk and calculated for each downstream node based on modelled discharge and project water use, but the Proponent hasn't described how/if they will manage flows to avoid high risk levels and maintain environmental flow needs (reduction of <10% of mean average by season) during operation. Please provide this information. To help OW better assess how TML is protecting the Environmental Flow Needs, provide details on if and how, TML will manage flows to avoid high risk levels and maintain environmental flow needs (reduction of <10% of mean average by season) during operation.	The Project addressed EFN risk and calculated predicted changes in average flows for each downstream node based on modelled discharges and Project water use. Additionally, Telkwa Mining will carry out robust monitoring programs to verify actual effects of the Project compared to modelled values. Four Creek at the most northerly prediction node may have water flow reductions greater than what fish habitat can sustain based on current information. However, Telkwa Mining will continue during the permitting phase to develop a detailed application with compensation and fish habitat loss. This will be provided to the OW for review. For other nodes associated with Four Creek the modelled flow reduction is less than the provincial guideline of 10% of where effects to fish habitat are expected. However, Telkwa Mining will have the ability to pump water from the Potable Water Storage Pond during potential low flows in summer and winter to ensure reductions due to the Project stay less than 10% to support fish habitat in Four Creek. This will be supported by a real time flow monitoring system that will be installed in the same location where the culvert that blocks fish passage upstream. Furthermore, SLR will be completing an updated EFN Assessment approach that will include a review regarding if/how flow reductions will be managed to mitigate potential effects to

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					aquatic environments. As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to EFN to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent Project Development processes or incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-052	500	Appendix L- Memo IR responses ITT498, 500-504, and 520 Palmer	How can TC monitor and offset for loss of fish production when they haven't measured it?	Fish abundance estimates for Tenas Creek and Goathorn Creek have not yet been reported. TML must provide fish abundance estimates for Tenas Creek and Goathorn Creek.	It is important to clarify the distinction between fish production and fish abundance. Fish production - refers to the rate at which new fish biomass is generated within a population over time, primarily through individual growth and reproduction. It provides insight to how rapidly a population is replenishing itself. Fish production is a dynamic and complex parameter and is best assessed using variables that influence production – such as fish abundance and food availability.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					Food availability can be partially assessed through abundance of benthic invertebrates. Benthic invertebrate surveys were presented in the Project’s baseline report (Attachment OW-052-1). Fish abundance - represents the number of fish present in a specific area at a given time, offering a snapshot of the status of the population. To supplement the information presented in the EAC application, an additional fish abundance monitoring program in Tenas Creek and Goathorn Creek will be completed in 2025. This program is comprised of one representative site per reach in each creek and will utilize three- pass depletion electrofishing to calculate abundance estimates of key species. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish abundance to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-053	501	Appendix L- Memo IR responses ITT498, 500-504, and 520 Palmer	Offsetting projects have a documented 63% failure rate, how will TC ensure that theirs is not one of those?	The conceptual offsetting plan does not provide sufficient information to give confidence of its feasibility and effectiveness at offsetting predicted HADDs. To address these issues, OW recommends that TML conduct more studies to accurately map where and how fish habitat is being used, especially for trout species. This will include analyzing how decreasing winter baseline flows by 2.7% (Goathorn), 7.6% (Tenas) and 24% (Four) will impact those population-limiting habitats, and how exceeding water quality guidelines in Four and Tenas Creek will further degrade the available habitat. Additionally, TML should explore the feasibility for an alternate location for planned offsetting activities away from the 1.5 km section of lower Goathorn Creek, which is already very high value steelhead spawning habitat. Instead, plan to improve a lower quality habitat, such as: • Creating additional overwintering habitat and addressing connectivity issues for Four Creek to restore damage from logging and road building; • Adding additional off-channel habitat to lower quality and heavily logged reaches of upper Goathorn Creek and its tributaries; and/or	Department of Fisheries and Oceans (DFO) Harmful Alteration Destruction and/or Disruption (HADD) permit applications for Four Creek, Tenas Creek, and Goathorn Creek, and potential offsetting plans will be provided to OW for review and comment prior to submission to DFO. Telkwa Mining encourages the OW to become involved in field assessments and the development of potential fish habitat offsetting options for Goathorn Creek, Helps Creek, and Four Creek during the summer 2025 field program. Under the Fisheries Act, proponents are required to provide a Letter of Credit to guarantee the implementation of offsetting measures for fish habitat. The Letter of Credit is provided to Fisheries and Oceans Canada, and the proponent remains responsible until it is confirmed that the offsetting goals have been fully met. These measure, once implemented, must be monitored over several years to ensure they are effective and sustainable. An updated offsetting program will be shared and developed during the permitting process that will aim to: • Create additional overwintering habitat and addressing connectivity issues for Four Creek to restore damage from logging and road building;

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				Addressing severe habitat impacts due to agriculture in Helps and Hubert Creeks.	• Add additional off-channel habitat to lower quality and heavily logged reaches of upper Goathorn Creek and its tributaries; and/or • Addressing severe habitat impacts due to agriculture in Helps Creek. Any potential offsetting will be approved by DFO and designed in collaboration with the OW for indigenous knowledge and input, as well as professional biologists and professional engineers/geoscientists that are experienced in habitat restoration. This will occur during the permitting process. Part of the design process will involve conducting studies and analysis to characterize physical processes that pose a risk to offsetting (e.g., flood magnitudes, sediment transport dynamics, groundwater-surface water interactions). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish habitat offsetting to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-054	502	Appendix L- Memo IR responses ITT498, 500-504, and 520 Palmer	Who will manage WQ and structural issues after the 25-year post-closure period?	None	Thank you. Telkwa Mining acknowledges that the comment is closed, and no further response is required.
OW-055	503	Appendix L- Memo IR responses ITT498, 500-504, and 520 Palmer	Most of the data on fish community and habitat usage is from the 1980s, and their own data shows that it may have changed. Why didn't they survey more than 9 sites in two years?	There have been insufficient modern surveys to determine the importance of the Project Area to Chinook salmon, pink salmon, bull trout, coho salmon, and steelhead. TML must conduct sufficient additional surveys to determine the importance of the Project Area to Chinook salmon, pink salmon, bull trout, coho salmon, and steelhead.	The comment raised regarding the apparent discrepancies between historical and current fish community data within the Project area is acknowledged. While it is true that Chinook Salmon (<i>Oncorhynchus tshawtscha</i>), Pink Salmon (<i>Oncorhynchus gorbuscha</i>), and Bull Trout (<i>Salvelinus confluentus</i>) were not observed during recent surveys, this absence should not be interpreted as definitive evidence of a shift in community composition or the loss of these species from the system. These species are anadromous which means that their presence in freshwater systems is typically limited to specific life stages – primarily adult spawning migrations. The timing and frequency of these migrations can vary significantly by species and watershed. For example, Pink Salmon exhibit a strict two-year spawning cycle, meaning that surveys conducted in off- cycle years would not detect their presence. Similarly, spawning runs can be missed if surveys do not align precisely with the timing of fish migration and spawning activity. Therefore, the lack of recent observations is more likely attributed to survey timing and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					interannual variability rather than a true absence of these species. There are no known barriers between the Telkwa River, Goathorn Creek, and Tenas Creek that would prevent fish passage. Therefore, it remains reasonable that these systems continue to provide accessible habitat for anadromous species, including Steelhead (<i>Oncorhynchus mykiss</i>), Bull Trout, Chinook Salmon, and Pink Salmon. It is understood that additional data is being requested to further characterize the presence and habitat use of fall-spawning salmonids. Even though the data in the Application is sufficient for the EA process, Telkwa Mining has planned a targeted fall spawner survey program in 2025. This program will include systematic bank walks throughout the spawning window for Chinook Salmon, Pink Salmon, and Bull Trout. Site selection for these surveys will be informed by the results of the proposed summer habitat assessments, ensuring that efforts are focused on areas with the highest potential for spawning activity. It is important to note that Steelhead spawning occurs in the spring and will therefore require a separate survey. However, given the low success rate of previous spawning surveys, Telkwa Mining believes it is more appropriate that a spawning habitat survey be conducted instead.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to modern fish surveys to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project.
OW-056	504	Appendix L- Memo IR responses ITT498, 500-504, and 520 Palmer TML IR Response - Palmer_Steelhead BCEAO IR Response_2024 TML IR Response - Palmer_Tenas 2023 Steelhead IR_Nov 2023_v0.3	Where is critical steelhead spawning areas in the project area, and how will they protect them?	Steelhead critical spawning habitat has not been identified.	The Steelhead Memorandum (Palmer 2024a), Attachment OW-022-1 concludes that Steelhead (<i>Oncorhynchus mykiss</i>) spawning likely occurs in the lower reaches of both Goathorn and Tenas Creeks. This also aligns with previously reported data within the Application from Bustard. The concerns raised regarding the analysis presented in Palmer (2024a), Attachment OW-022-1 are acknowledged, and it is important to note that the report does not assert the absence of either life history type within these systems. It is maintained that the presence of Steelhead in Goathorn and Tenas Creeks should be assumed, given the absence of barriers to fish passage from the Telkwa River into these creeks. To supplement the current information and data and to respond to the OW's request to identify areas of potential Steelhead spawning habitat with in Goathorn and Tenas Creeks, additional spawner surveys that focus on identifying key Steelhead and Rainbow Trout spawning habitat features will be conducted in

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					2025. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to steelhead critical spawning habitat to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. Since the information is forthcoming, it will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the development of the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-057	NEW	Engagement and Effects Assessment	NA	Moving forward, TML should commit to more meaningful integration of Wet'suwet'en knowledge and concerns in the EA and to more clearly explain how input and knowledge from OW/Wet'suwet'en will be carried into the assessment and project planning.	Telkwa Mining acknowledges the comment. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-058	NEW	Engagement and Effects Assessment	NA	Provide responses to all outstanding Wet'suwet'en information requests such that all gaps and issues are meaningfully and accurately addressed.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-059	NEW	Engagement and Effects Assessment	NA	Establish a more robust and consistent co-managed Issues Tracking Table where all Wet'suwet'en concerns and issues can be logged and carried forward in a systematic way as the assessment progresses.	Telkwa Mining acknowledges the comment, Telkwa Mining is will use this tracking table that was co developed by the OW, Telkwa Mining, and various consultants.
OW-060	NEW	Engagement and Effects Assessment	NA	Identify VCs and impacts that are specific to Wet'suwet'en.	Telkwa Mining acknowledges the comment. Please refer to Attachments OW-060-1 and OW-060-2 for a summary of Valued Components (VCs) and impacts that have been communicated to Telkwa Mining by the OW since the Tenas Project's BC Environmental Assessment Certificate Application process started in 2017. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-061	NEW	Engagement and Effects Assessment	NA	Analyze impacts holistically so that any significant linkages between VCs and impacts meaningfully considered in the assessment.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-062	NEW	Engagement and Effects Assessment	NA	Ensure all impacts to Wet'suwet'en values are meaningfully considered in the context of cumulative pressures. This includes considering how the current baseline has been, and will be,	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-062-1. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				impacted by all past, present, and likely future projects and how the Wet'suwet'en values and resources may be sensitive to further pressures, including the Project. The Project itself and associated accommodation measures should be developed in consideration of this context.	informs Project design, monitoring, mitigation, and adaptive management plans.
OW-063	NEW	Engagement and Effects Assessment	NA	Adapt Project components and mitigation measures in a way that meaningfully resolves Wet'suwet'en concerns about impacts to all VCs. To this end, TML must: Develop all mitigation, offsetting, monitoring, and adaptive management and response plans for review by OW.	Telkwa Mining acknowledges the comment. Please refer to Attachments OW-060-1 and OW-060-2 that provide the current list of proposed offsets, mitigations, and management plans for review and feedback. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-064	NEW	Engagement and Effects Assessment	NA	Provide a table that clearly presents all mitigation measures and management plans by mid-March 2025, so that the measures and plans can be considered in OW's Rights Impact Assessment (RIA). The table should present all VCs, impact pathways, and associated mitigation measures proposed by TML to avoid, mitigate, offset, or compensate for each impact. The table must be updated as engagement on mitigation measures progresses and will be used in OW's RIA to assess the effectiveness of the mitigation measures and	Telkwa Mining acknowledges the comment. Please refer to Attachments OW-060-1 and OW-060-2 that provides the current list of proposed offsets, mitigations, and management plans for review and feedback. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				the severity of any residual impacts to the priority rights identified by the Wet'suwet'en.	
OW-065	NEW	Engagement and Effects Assessment	NA	The Proponent and EAO must work collaboratively with OW to develop a clear work plan aimed at: -Achieving consensus about the significance of Project and cumulative impacts to all VCs of importance to Wet'suwet'en identified in forthcoming OW studies and engagement processes, including but not limited to the Wet'suwet'en RIA, CUS, and WWS and information related to cumulative pressures on Wet'suwet'en rights and interests.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response. Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-066	NEW	Engagement and Effects Assessment	NA	Ensuring the Wet'suwet'en Assessment and Decision-making processes adequately inform EAO's decision making processes and reporting, specifically in the EAO's assessment report and Sustainability Recommendation.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response.
OW-067	NEW	Engagement and Effects Assessment	NA	Developing Project Certificate Conditions aimed at enforcing mitigation requirements that address concerns if the Project moves forward.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response.
OW-068	NEW	Engagement and Effects Assessment	NA	The EAO must also commit to reflecting OW's findings from the RIA in the assessment report.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-069	NEW	Engagement and Effects Assessment	NA	The EAO must commit to respecting Wet'suwet'en's consent process and must not proceed with the Project unless the Houses grant consent.	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response.
OW-070	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	N/A - comment only	Telkwa Mining acknowledges the comment. Please refer to Attachments OW-060-1 and OW-60-2 that provides the current list of proposed offsets, mitigations, and management plans for review and feedback. As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-071	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and	Culture and Rights	N/A - comment only	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-071-1 that provides a summary of how the OW have provided input into the Tenas Project's EA process between 2017 and 2022.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.			
OW-072	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land	Culture and Rights	N/A - comment only	Telkwa Mining acknowledges the reviewer's comment. Telkwa Mining defers to the EAO to provide a response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		and Resource Use.			
OW-073	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Specifically, the Proponent and EAO must: -Integrate existing and forthcoming information from OW and the Houses on an ongoing basis to ensure consensus about Project impacts to rights and culture and develop robust mitigation measures in advance of the EAO's effects assessment phase.	Telkwa Mining acknowledges the reviewer's comment. Telkwa Mining defers to the EAO to provide a response. Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-074	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment;	Culture and Rights	Ensure impacts to Culture and Rights identified in forthcoming OW studies and engagement processes, including the Wet'suwet'en RIA, CUS, and CWB Study, are adequately addressed.	Telkwa Mining acknowledges the reviewer's comment. Telkwa Mining defers to the EAO to provide a response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		•Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.			
OW-075	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Integrate any forthcoming information from OW reviews and from Wet'suwet'en Assessment process on TML's Public Access Management Plan to ensure Wet'suwet'en concerns are addressed and members are able to access the culturally important areas.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-033. Telkwa Mining defers to the EAO to provide additional response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-076	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Provide the information requested in IR 492 ITT IR (LWRS, ECCC) related to access to the Goathorn Creek Bridge;	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-033. Telkwa Mining defers to the EAO to provide additional response.
OW-077	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources	Culture and Rights	Ensure all impacts to Wet'suwet'en Culture and Rights are considered in the context of cumulative pressures. This includes considering how the current baseline has been, and will be, impacted by all past, present, and likely future projects and how the current practice of Wet'suwet'en Culture and Rights is sensitive to further pressures. The Project itself and associated accommodation measures should be developed in consideration of this context.	Telkwa Mining acknowledges the reviewer's comment. Telkwa Mining defers to the EAO to provide a response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.			
OW-078	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Consider impacts within a 100 m LSA and examine Wet'suwet'en traditional knowledge and any OW studies to determine sites/areas of cultural importance that could be impacted by the Project.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA into Project design, monitoring, mitigation, and adaptive management plans for sites and areas of cultural importance.
OW-079	NEW	Culture and Rights	Culture and Rights	Conduct field surveys of areas surrounding Culturally Modified Trees in the Project footprint prior to construction.	Telkwa Mining acknowledges the comment. Telkwa Mining will ensure processes are in place to identify and respond to CMTs as part of the YMB-Enhanced Heritage Resources Management Plan

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		•Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and - Section 6: Land and Resource Use.			(Attachment OW-079-1), "If avoidance is not possible, prior to alteration of any post-1846 CMTs, the OW will be consulted to determine, if necessary, the preferred mitigation measures." As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-080	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and	Culture and Rights	Develop Chance Find Procedure for Heritage resources acceptable to the House Groups – including protocols and expectations for burial sites.	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-080-1 for the current DRAFT Chance Find Procedure for feedback by the House Groups and the OW.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 6: Land and Resource Use.			
OW-081	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Develop a Chance Find Procedure for Traditional Use Sites/Cultural Use Sites acceptable to the House Groups.	Telkwa Mining acknowledges the comment. See above response to comment ID OW-081.
OW-082	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests	Culture and Rights	Identify any other protocols or ceremonies that need to be respected and followed (e.g. prior to construction, in the event of a wildlife mortality etc.)	Telkwa Mining acknowledges the comment. As the Project progresses, Telkwa Mining will continue to engage with the OW to identify appropriate protocols and ceremonies to be followed during Project development.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.			
OW-083	NEW	Culture and Rights •Section 11: Wet'suwet'en Rights and Interests Assessment; •Section 6: Visual Resources Assessment; •Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Identify impact pathways of concern associated with sensory impacts (sight, smell, noise, vibrations) and develop OW priority mitigations for those impacts.	Telkwa Mining acknowledges the comment. As the Project progresses, Telkwa Mining will continue to engage with the OW on proposed mitigations to appropriately support their consideration and integration into the ongoing development and implementation of management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-084	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Determine monitoring needs for Culture, Rights, and Heritage develop a monitoring plan with the proponent – including requirements for monitoring post-operations.	Telkwa Mining acknowledges the comment. As the Project progresses, Telkwa Mining will continue to engage with the OW on proposed monitoring needs so that these can be appropriately integrated into the ongoing development and implementation of management and monitoring plans. Telkwa Mining is continuing to work with the OW on reclamation and closure planning, which includes post-operations monitoring.
OW-085	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources	Culture and Rights	Incorporate Wet'suwet'en protocols and access needs into the Public Access Management Plan with a goal of protecting Wet'suwet'en Culture and Rights. TML should work with OW to determine how the restricted areas of the Project may impact travel corridors for Wet'suwet'en people.	Telkwa Mining acknowledges the comment. As the Project progresses, Telkwa Mining will continue to engage with the OW on Wet'suwet'en protocols and access needs so that they can be appropriately integrated into ongoing development and implementation of management plans and monitoring plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.			
OW-086	NEW	Culture and Rights ●Section 11: Wet'suwet'en Rights and Interests Assessment; ●Section 6: Visual Resources Assessment; ●Section 7: Heritage Effects Assessment; and Section 6: Land and Resource Use.	Culture and Rights	Revise the Visual Resources Management plan to Wet'suwet'en-specific visual management strategies.	Telkwa Mining acknowledges the comment. As the Project progresses, Telkwa Mining will continue to engage with the OW on proposed mitigations to appropriately support their consideration and integration into the ongoing development and implementation of management plans.
OW-087	NEW	Socio-Economic Conditions:	Socio-Economic Conditions	TML must adapt Project components and mitigation measures in a way that meaningfully resolves the gaps and issues noted in this Report and in	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response. Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		- Section 5 Chapter 1: The Labour Market; -Section 5 Chapter 2: Economic Development; -Section 6 Chapter 1: Demographics; - Section 6 Chapter 2 Infrastructure and Services; -Section 6 Chapter 5: Community Well-being; and - Section 8 Chapter 1: Human Health.		forthcoming material from OW and the Houses, including potential reviews of TML responses and supplemental material, as well as the studies to be produced as part of the Wet'suwet'en Assessment process. TML must also implement Indigenous health frameworks and Wet'suwet'en-defined mitigation measures.	appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-088	NEW	Socio-Economic Conditions: - Section 5 Chapter 1: The Labour Market; -Section 5	Socio-Economic Conditions	To do this, the EAO must evaluate the effects of socio-economic and health/wellbeing changes in a way that accounts for Wet'suwet'en values, indicators, and thresholds and that uses community data to inform the analysis. Impacts to Indigenous health and wellbeing should be	Telkwa Mining acknowledges the comment. Telkwa Mining defers to the EAO to provide a response.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 2: Economic Development; -Section 6 Chapter 1: Demographics; - Section 6 Chapter 2 Infrastructure and Services; -Section 6 Chapter 5: Community Well-being; and - Section 8 Chapter 1: Human Health.		assessed in a holistic fashion where interactions between VCs and pathways	
OW-089	NEW	Socio-Economic Conditions: - Section 5 Chapter 1: The Labour Market; -Section 5 Chapter 2: Economic Development; -Section 6	Socio-Economic Conditions	OW requires further work to determine the following: Whether disproportionately impacted communities have been appropriately and adequately engaged; What disproportionate impacts to distinct populations will result from the Project; and How to monitor and respond to these impacts	Telkwa Mining acknowledges the comment. Please refer to Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 1: Demographics; - Section 6 Chapter 2 Infrastructure and Services; -Section 6 Chapter 5: Community Well-being; and - Section 8 Chapter 1: Human Health.		through mitigation measures and adaptive management plans.	
OW-090	NEW	Socio-Economic Conditions: - Section 5 Chapter 1: The Labour Market; -Section 5 Chapter 2: Economic Development; -Section 6 Chapter 1: Demographics; - Section 6 Chapter 2	Socio-Economic Conditions	Determine how negative effects will be considered, as it is possible for potentially negative socio-economic effects to be turned into positive effects with appropriate planning, such as funding into socio-economic programs to offset potential risks from the project. A Wet'suwet'en-specific labour market analysis should inform the development of employment targets and education and training funding commitments that may be negotiated as part of any formal agreement. A more thorough cumulative effects analysis should be used that uses a pre-contact or pre-industrial baseline and that considers all past, present, and likely future effects.	Telkwa Mining acknowledges the comment. Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Infrastructure and Services; -Section 6 Chapter 5: Community Well-being; and - Section 8 Chapter 1: Human Health.			
OW-091	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources	NA	For all Valued Components related to the natural environment, the Proponent and the EAO must: -Commit to integrating the findings of applicable Wet'suwet'en-led studies and other information sources into Project assessments, mitigation measures, and sustainability recommendations, including but not limited to the forthcoming RIA, CUS, and CWB Study, on: -Cumulative effects into Project mitigation and monitoring strategies; and -A pre-disturbance baseline that accounts for legacy impacts (which are largely discounted in the current CEA).	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and CWB Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and the OW.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-092	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to integrating the findings of applicable Wet'suwet'en-led studies and other information sources, including but not limited to information on: -Wet'suwet'en knowledge on impact pathways, significance, and mitigation measures;	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and CWB Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and the OW.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-093	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to integrating the findings of applicable Wet'suwet'en-led studies and other information sources, including but not limited to information on: -Species of cultural importance to Wet'suwet'en that are currently missing from the Proponent's assessment, including beaver, mountain goat, grouse, bog cranberry, Lowbush berry, red cedar, yellow cedar, common juniper, rocky mountain juniper, skunk cabbage, and nodding onion; -Potential changes in use by House members of species of cultural importance to Wet'suwet'en	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, Cultural Use Study, and Cultural Wellbeing Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and the OW. The Proponent remains committed to continued engagement during permitting and implementation to ensure values important to the OW and House members are considered through project design, mitigation, and monitoring.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		that are currently missing from the Proponent's assessment, including beaver, mountain goat, bog cranberry, Lowbush berry, red cedar, yellow cedar, common juniper, rocky mountain juniper, skunk cabbage, nodding onion, and grouse.	
OW-094	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Update the direct and indirect effects assessments related to caribou as outlined in greater detail in OW's responses to IRs 418 ITT IR (LWRS and ECCC). The updated effects assessment must include: -Impacts to the entire Critical Habitat area (RSA-1), including impacts to moderate and high suitability low elevation winter habitat AND Type 1 matrix habitats.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		-A clear rationale for the Proponent’s statement that the direct and indirect effects of the Project will not worsen existing conditions in disturbed areas for the Telkwa Caribou Herd, and how the loss of potential natural regeneration of disturbed areas <40 years old by 2050 is being accounted for. -Scenarios where: -The total disturbance is calculated from existing, permanent disturbances in the Critical Habitat area. All burns and cut blocks are assumed to eventually provide habitat and are not included in the total disturbance; and -The Project's total disturbance is added to the existing above disturbance. -A calculation of the area of these habitats that will be indirectly affected regardless of current caribou presence/absence. -Updated version of the effects assessment that includes the area of direct and indirect effects within RSA-1 and RSA-2-Core regardless of the current habitat disturbance status.	

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-095	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Undertake a complete cumulative effects assessment for listed birds' species	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-097-1. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 9: Avian Species.			
OW-096	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Undertake a cumulative effects assessment with more fulsome consideration of climate change and its associated additive effects.	Telkwa Mining acknowledges the comment. Telkwa Mining recognizes the importance of climate change and acknowledges the concern raised regarding its potential influence on vegetation, wildlife, avian, and terrain/soils resources. A project-specific Greenhouse Gas (GHG) analysis was completed and is included in the Environmental Assessment, which evaluates emissions in the context of BC's climate change targets. This analysis quantifies emissions, including the Project's potential positive or negative effects on carbon sinks with discussion of effects of the Project on vegetation and terrestrial resources. It discusses future scenarios and proposes mitigation measures accordingly. The vegetation, wildlife, avian, and terrain and soils Valued Components cumulative effects assessments are based on current ecosystem conditions, with consideration of habitat function and species use. While climate change is expected to affect ecosystems over time, these effects are predicted to be gradual, regionally variable, and subject to considerable uncertainty at the local scale of the Tenas Project in terms of their manifestation and the responses of these VCs to ecosystem change. The incremental contribution of the Project is not expected to materially alter regional climate-related trends, nor do the uncertain effects of future climate change alter the significance conclusions of the cumulative effects assessments,

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			which are grounded in known effects and predictable changes in ecosystem conditions. With respect to the Atmospheric Environment VC, which includes dust, noise, and other local air quality parameters, climate change is not expected to materially influence these project-related effects and the GHG analysis addresses quantification of emissions. The effects of the Project on Atmospheric Environment parameters are driven by project activities and mitigated through standard design measures, operational controls, and monitoring. As such, the cumulative effects assessment for this VC reflects the localized, short-term nature of the potential effects that are independent of the effects of climate change. Telkwa Mining has proposed mitigation measures and adaptive management strategies that allow for response to observed environmental changes over time, including those that may be attributable to climate-driven shifts in ecosystem conditions. These approaches will be refined during permitting and implementation in collaboration with regulators and Indigenous groups. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-097	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Undertake a project residual effects assessment that accurately accounts for indirect impacts on wildlife (especially for caribou) and avian species.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029, which refer to an updated assessment for caribou, including both direct and indirect effects. A comprehensive residual effects assessment for avian species, including indirect effects, was conducted, and is documented in Chapter 9 (Avian Species Valued Component; Attachment OW-097-1) of the Tenas Project's Environmental Assessment Certificate (EAC) Application. This assessment explicitly considered indirect impacts—such as habitat fragmentation, edge effects, and sensory disturbance—on migratory breeding birds, listed bird species, and raptors. These were evaluated under the “change in habitat” indicator, which includes both direct and indirect disturbance. Given that these indirect effects were fully integrated into the methods, results, and significance determination for each subcomponent, no further assessment is required at this time. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 9: Avian Species.			
OW-098	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to opportunities for House members to cooperatively undertake and participate in: pre-clearing surveys for sensitive wildlife habitats (e.g. dens, stick nests); pre-clearing surveys to allow House members access to culturally important plants and collect seeds for reclamation activities; determining the locations of western toad crossing locations and monitoring the effectiveness of mitigation measures; and adaptive management decision making.	Telkwa Mining acknowledges that the comment and welcomes the opportunity to include House and OW members to cooperatively undertake and participate in: -pre-clearing surveys for sensitive wildlife habitats (e.g. dens, stick nests); -pre-clearing surveys to allow House members access to culturally important plants and collect seeds for reclamation activities; -determining the locations of western toad crossing locations and monitoring the effectiveness of mitigation measures; and -adaptive management decision making. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-099	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to fully and appropriately offsetting impacts to the natural environment to fully mitigate project effects (e.g. loss of habitat for Species at Risk, loss of wetlands).	Telkwa Mining acknowledges the comment. Telkwa Mining will appropriately assess impacts to the natural environment to mitigate potential Project effects following guidance from Federal Policy on Wetland Conservation (Government of Canada (GoC) 1991), the Proposed Species at Risk Act Policies and Guidelines (GoC 2016) and the Policy for applying measures to offset harmful impacts to fish and fish habitat (GoC 2025). As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-100	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	For caribou, the Proponent should, in relation to the IR from BC EAO from Oct 6, 2022: -Provide all information requested in OW's attached response to the IR from BC EAO; -Commit to offset Project related direct and indirect effects on Telkwa caribou herd habitat based on the revised Project effects assessment as requested in this and other comments;	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-101	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Provide further details of the field-based assessments noted in Appendix C including, but not limited to: -The spatial extent of on the ground survey activities at each location; -The methods used to confirm / discount PEM / TEM mapping; and -The spatial extent of each PEM / TEM mapping polygon in which surveying was conducted.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029. In the Vegetation and Ecosystems Baseline Report (Appendix 4.7-A in the Project Application; Ardea Biological Consulting 2022, Attachment OW-029-2) the TEM occurred within the Vegetation Local Study Area (LSA; Project footprint + 250–500 m buffer) and PEM mapping occurred in the Vegetation Regional Study Area (RSA; Project footprint + 5 km buffer) and beyond, including the broader RSA-1 (Telkwa Caribou Herd Critical Habitat boundary). As part of the development of the TEM, 780 ecosystem plots were investigated from 1997–2019 and were used to characterize vegetation and ecosystem types (Table 3.2-2 in Appendix 4.7-A, Attachment OW-029-2). At the mine site, 445 plots were completed; 371 of these plots were completed from 2017–2019. A detailed mapping accuracy assessment was completed for TEM polygons using the methods outlined in (Meidinger 2003).

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			For more details related to the PEM/TEM, please refer to Appendix 4.7-A in the EAC Project Application, Attachment OW-029-2. Further information on additional verification of low-elevation capable winter range habitat (August 2024 fieldwork), which was classified using PEM/TEM mapping, is provided in Attachment OW-029-1. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study and further engagement into Project design, monitoring, mitigation, and adaptive management plans.
OW-102	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to undertaking further assessments of PEM / TEM mapping, inclusive of areas not identified as moderate or high suitability habitat to confirm its absence of these features, to better understand where moderate/high suitability caribou habitat may actually be present or absent. TML should undertake further discussions with ECCC, WLRS, and Wet'suwet'en to 1) ensure that the proposed scale, extent, timing, and methods of this survey are appropriate and 2) discuss other opportunities for habitat offsetting in areas without advanced regeneration.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-103	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Provide details of the further actions that will be undertaken to identify other possible high-elevation restoration offsets. OW expects this will include ground truthing additional areas, undertaking further discussions with TML, ECCC, WLRS, and Wet'suwet'en to determine the location of other possible suitable high-elevation restoration offset locations.	Telkwa Mining acknowledges the comment. Based on the work completed in September 2024, over 90% of the identified high elevation restoration offset targets were reviewed at a reconnaissance level and determined that undertaking restoration activities may cause more disturbance than allowing natural regeneration to occur on its own. Telkwa Mining reviewed the remaining 10% of high-elevation restoration candidates, with the participation of OW, during August 2025 fieldwork. The candidates surveyed in August 2025 were used to inform offsetting calculations. Further details are provided in Section 6.5

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			of Appendix 1 (Attachment OW-026-1). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the Rights Impact Assessment (RIA), Cultural Use Study (CUS), and Cultural Wellbeing (CWB) Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and OW.
OW-104	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2:	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Undertake further discussions with TML, ECCC, WLRS, and Wet'suwet'en to determine offsetting ratios that will be required for the Project that reflect the current dire context of low population levels of the Telkwa caribou herd and highly disturbed landscape that the herd occupies.	Telkwa Mining acknowledges the comment. Please see responses to comment IDs OW-026 and OW-029.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-105	NEW	Environment Section 4 Chapter 1: Atmospheric	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to providing all offsetting funds at the start of the Project, to ensure that the maximum	Telkwa Mining acknowledges the comment. Please see responses to comment ID OW-029.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		effectiveness and benefit of offsetting activities on the Telkwa caribou herd are realized.	

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-106	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Commit to updating acoustic models to account for terrain and atmospheric conditions to assess impacts on caribou and their habitat, and include mapping showing the extent of biologically relevant thresholds for caribou (i.e. 30 Hz at 30 dB). In specific, TML must: -Provide the information requested in OW's response to 491 ITT IR (ECCC, LWRS); -Provide an updated Blasting Noise Assessment where modelled blasting sites are chosen based on the closest potential location to the RSA-2-Core habitat; -Update the maps provided in the Proponent's assessment to account for the blasting noise reassessment; and -Incorporate the lower auditory threshold for caribou into the Blasting Noise Assessment.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-032.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 9: Avian Species.			
OW-107	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Update baseline studies (opportunities should be explored for more recent baseline data collection or at a minimum, updating of habitat models based on recent disturbances).	Telkwa Mining acknowledges the comment. Based on a review of field activities that have occurred since terrestrial baseline activities were completed in 2018 it was determined by Independent Qualified Professionals that baseline data was still valid and did not required to be updated. In response to OW concerns, Telkwa Mining assessed habitat capability for caribou in the area and searched for evidence of use during September 2024 and August 2025 field programs. Habitat capability of low-elevation winter range, which was classified using TEM/PEM mapping, was assessed in 66 (5.65-m radius) plots based on site series and caribou habitat suitability and capability across the Project Footprint. The fieldwork validated the use of the TEM/PEM approach, and identified limited evidence of caribou use within the Project Footprint. Additional details are provided in Section 5.2.3.3 of Appendix 1 (Attachment OW-026-1). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the Rights Impact Assessment, CUS, and Wellbeing Study and further engagement into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-108	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat	Vegetation, Wildlife, Avian, Atmospheric Environment, and Terrains and Soils	Extend the time allotted for post-closure monitoring to ensure that desired restoration endpoints are met and Project predictions are confirmed (i.e. suitable habitat is restored and effects are minimized).	Telkwa Mining acknowledges the comment. Please refer to BC EAO EAC Application - Tenas Project, Section 13.0, Chapter 15.0 Reclamation and Closure Plan, May 2022, Version 1.0 (Attachment OW-063-1) . Telkwa Mining has included 29 follow-up visits over a period of 60 years to undertake post-closure monitoring to ensure that desired restoration endpoints are met and Project predictions are confirmed (i.e. suitable habitat is restored and effects are minimized). Based on the experience of Qualified Professionals this is sufficient time for this type of monitoring. Water monitoring may continue in some form for 100 years based on bonding requirements determined during development of the Project. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-109	The comment raised regarding the apparent discrepancies between historical and current fish community data within the Project area is acknowledge	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources	For Fish and Fish Habitat	Conduct sufficient additional surveys to determine the importance of the Project Area to Chinook salmon, pink salmon, bull trout, coho salmon, and steelhead.	Telkwa Mining acknowledges the comment. Please see Attachment OW-022-1. The comment raised regarding the apparent discrepancies between historical and current fish community data within the Project area is acknowledged. While it is true that Chinook Salmon, Pink Salmon, and Bull Trout were not observed during recent surveys, this absence should not be interpreted as definitive evidence of a shift in community composition or the loss of these species from the system. These species are anadromous which means that their presence in freshwater systems is typically limited to specific life stages – primarily adult spawning migrations. The timing and frequency of these migrations can vary significantly by species and watershed. For example, Pink Salmon exhibit a strict two-year spawning cycle, meaning that surveys conducted in off- cycle years would not detect their presence. Similarly, spawning runs can be missed if surveys do not align precisely with the timing of fish migration and spawning activity. Therefore, the lack of recent

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	dged. While it is true that Chinook Salmon, Pink Salmon, and Bull Trout were not observed during recent surveys, this absence should not be interpreted as definitive evidence of a shift in community composition or the	Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			observations is more likely attributed to survey timing and interannual variability rather than a true absence of these species. There are no known barriers between the Telkwa River, Goathorn Creek, and Tenas Creek that would prevent fish passage. Therefore, it remains reasonable that these systems continue to provide accessible habitat for anadromous species, including Steelhead, Bull Trout, Chinook Salmon, and Pink Salmon. It is understood that additional data is being requested to further characterize the presence and habitat use of fall-spawning salmonids. Even though the data in the Application is sufficient for the EA process, Telkwa Mining has planned a targeted fall spawner survey program in 2025. This program will include systematic bank walks throughout the spawning window for Chinook Salmon, Pink Salmon, and Bull Trout. Site selection for these surveys will be informed by the results of the proposed summer habitat assessments, ensuring that efforts are focused on areas with the highest potential for spawning activity. It is important to note that Steelhead spawning occurs in the spring and will therefore require a separate survey. However, given the low success rate of previous spawning surveys, Telkwa Mining it is more appropriate that a spawning habitat survey be conducted instead.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	loss of these species from the system. These species are anadromous which means that their presence in freshwater systems is typically limited to specific life stages – primarily adult spawning migrations. The timing				As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to modern fish surveys to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from the OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	and frequency of these migration s can vary significant ly by species and watershe d. For example, Pink Salmon exhibit a strict two- year spawning cycle, meaning that surveys conducte d in off- cycle years would not detect				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	their presence. Similarly, spawning runs can be missed if surveys do not align precisely with the timing of fish migration and spawning activity. Therefore, the lack of recent observati ons is more likely attributed to survey timing and				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	interannual variability rather than a true absence of these species. There are no known barriers between the Telkwa River, Goathorn Creek, and Tenas Creek that would prevent fish passage. Therefore, it remains reasonable				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	e that these systems continue to provide accessible habitat for anadromous species, including Steelhead, Bull Trout, Chinook Salmon, and Pink Salmon. It is understood that additional data is being requested to further				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	characterize the presence and habitat use of fall-spawning salmonids . Even though the data in the Application is sufficient for the EA process, Telkwa Mining has planned a targeted fall spawner survey program in 2025.				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	This program will include systematic bank walks throughout the spawning window for Chinook Salmon, Pink Salmon, and Bull Trout. Site selection for these surveys will be informed by the results of the proposed summer				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	habitat assessments, ensuring that efforts are focused on areas with the highest potential for spawning activity. It is important to note that Steelhead spawning occurs in the spring and will therefore require a separate survey.				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	However, given the low success rate of previous spawning surveys, Telkwa Mining it is more appropriate that a spawning habitat survey be conducted instead. As requested by OW, Telkwa Mining will discuss appropriate				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	incorporat ion of the results of forthcomi ng informatio n related to modern fish surveys to Indigenou s interests or Indigenou s nations into Project design, monitorin g, mitigation , and adaptive managem ent plans. The informatio				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	n will be considere d in subseque nt regulatory or Project Developm ent processes and incorporat ed as appropriat e in the operation al managem ent plans for the Project. The managem ent plans that will be in place for the				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
	Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.				

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-110	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife	For Fish and Fish Habitat	Identify critical steelhead spawning habitat before the potential risks of the project to steelhead can be determined, as per the Information Requests sent by the BC EAO on June 6, 2023; -TML must use an appropriate analysis to characterize the life histories of <i>Oncorhynchus mykiss</i> in the Project Area; the Proponent's assertion that they are, on average, a resident rainbow trout population is not supported.	The Steelhead Memorandum (Palmer 2024a, Attachment OW-022-1) concludes that Steelhead spawning likely occurs in the lower reaches of both Goathorn Creek and Tenas Creek. This also aligns with previously reported data within the Application from Bustard. The concerns raised regarding the analysis presented in Palmer (2024a, Attachment OW-022-1) are acknowledged and it is important to note that the report does not assert the absence of either life history type within these systems. It is maintained that the presence of Steelhead in Goathorn Creek and Tenas Creek should be assumed, given the absence of barriers to fish passage from the Telkwa River into these creeks. To supplement the current information and data and to respond to the OW's request to identify areas of potential Steelhead spawning habitat within Goathorn Creek and Tenas Creek, additional spawner surveys that focus on identifying key Steelhead and Rainbow Trout spawning habitat features will be conducted in 2025. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to steelhead critical spawning habitat to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 9: Avian Species.			management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-111	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4	For Fish and Fish Habitat	Provide fish abundance estimates for Tenas Creek and Goathorn Creek.	It is important to clarify the distinction between fish production and fish abundance. • Fish production refers to the rate at which new fish biomass is generated within a population over time, primarily through individual growth and reproduction. It provides insight to how rapidly a population is replenishing itself. Fish production is a dynamic and complex parameter and is best assessed using variables that influence production, such as fish abundance and food availability. Food availability can be partially assessed through abundance of benthic invertebrates. Benthic invertebrate surveys were presented in the Project's baseline report (Attachment OW-052-1). • Fish abundance represents the number of fish present in a specific area at a given time, offering a snapshot of the status of the population. To supplement the information presented in the EAC application, an additional fish abundance monitoring program in Tenas Creek

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			and Goathorn Creek will be completed in 2025. This program is comprised of one representative site per reach in each creek and will utilize three- pass depletion electrofishing to calculate abundance estimates of key species. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish abundance to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-112	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment	For Fish and Fish Habitat	With direction from OW and the Houses, conduct more studies to accurately map where and how fish habitat is being used, especially for trout species: -This will include analyzing how decreasing winter baseline flows by 2.7% (Goathorn), 7.6% (Tenas) and 24% (Four) will impact those population-limiting habitats, and how exceeding water quality	The comment raised regarding the apparent discrepancies between historical and current fish community data within the Project area is acknowledged. While it is true that Chinook Salmon, Pink Salmon, and Bull Trout were not observed during recent surveys, this absence should not be interpreted as definitive evidence of a shift in community composition or the loss of these species from the system. These species are anadromous which means that their presence

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		guidelines in Four and Tenas Creek will further degrade the available habitat; -The estimates of altered habitat identified through these analyses should be listed as a HADD and included in expanded mitigation and offsetting plans.	in freshwater systems is typically limited to specific life stages – primarily adult spawning migrations. The timing and frequency of these migrations can vary significantly by species and watershed. For example, Pink Salmon exhibit a strict two-year spawning cycle, meaning that surveys conducted in off- cycle years would not detect their presence. Similarly, spawning runs can be missed if surveys do not align precisely with the timing of fish migration and spawning activity. Therefore, the lack of recent observations is more likely attributed to survey timing and interannual variability rather than a true absence of these species. There are no known barriers between the Telkwa River, Goathorn Creek, and Tenas Creek that would prevent fish passage. Therefore, it remains reasonable that these systems continue to provide accessible habitat for anadromous species, including Steelhead, Bull Trout, Chinook Salmon, and Pink Salmon. It is understood that additional data is being requested to further characterize the presence and habitat use of fall-spawning salmonids. Even though the data in the Application is sufficient for the EA process, Telkwa Mining has planned a targeted fall spawner survey program in 2025. This program will include systematic bank walks throughout the spawning window for Chinook Salmon, Pink Salmon, and Bull Trout. Site selection for these surveys will be informed by the results of the proposed summer habitat assessments, ensuring that efforts are focused on areas with the highest potential for spawning activity.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					It is important to note that Steelhead spawning occurs in the spring and will therefore require a separate survey. However, given the low success rate of previous spawning surveys, Telkwa Mining it is more appropriate that a spawning habitat survey be conducted instead. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to modern fish surveys to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-113	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial	For Fish and Fish Habitat	With direction from OW and the Houses, explore the feasibility for an alternate location for planned offsetting activities away from the 1.5 km section of lower Goathorn Creek, which is already very high value steelhead spawning habitat. Instead, plan to improve a lower quality habitat, such as: -Creating additional overwintering habitat and	The offsetting options proposed by the OW will be reviewed and further evaluated. Telkwa Mining would like to work through options with OW during the DFO permitting process. There is concern with restoring connectivity between Four Creek and Goathorn Creek as it could potentially impact the isolated, self-sustaining population of Dolly Varden (<i>Salvelinus malma</i>) upstream of the hanging culvert in Four Creek. The Rainbow Trout from Goathorn Creek could aggressively displace the Dolly

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		addressing connectivity issues for Four Creek to restore damage from logging and road building; -Adding additional off-channel habitat to lower quality and heavily logged reaches of upper Goathorn Creek and its tributaries; -Addressing severe habitat impacts due to agriculture in Helps and Hubert Creeks.	Varden population present in Four Creek (Nonis et al. 2023, Taniguchi et al. 2000). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish habitat offsetting to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. The information will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the operational management plans for the Project. The management plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-114	NEW	Environment Section 4 Chapter 1: Atmospheric Environment	For Fish and Fish Habitat	Provide more details for the offsetting plan that are standard in offsetting plans included in the EA process: -An estimation of the area of habitat or fish	The fish habitat offsetting plan will prioritize fish species native to Tenas Creek, Goathorn Creek, and Four Creek, which may include Rainbow Trout and Dolly Varden. Potential offsetting options will undergo comprehensive review, including ground-based site investigations ecological suitability, hydrological

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		production that would be created by the proposed project for comparison to the proposed HADD; -Identify species that would be targeted by offsetting; and -Conduct ground investigations of the site to examine it for suitability for this plan.	stability, and long-term viability. The offsetting will be based on a robust estimation of the area of habitat or fish production that will be created by the proposed Project for comparison to the proposed HADD. To obtain a Fisheries Act Authorization, the offsetting plan must include a detailed, construction- ready design. This includes geographic coordinates, site plans, habitat function objectives, and a monitoring strategy to ensure the offsetting measures achieve their intended ecological outcomes (DFO 2019). Habitat loss estimates within the Project footprint will continue to be refined throughout permitting to inform the final calculation of required habitat offsetting. In accordance with federal guidance documents, a conservative offsetting ratio of 2:1 will be applied – meaning that for every 100m² of habitat lost, 200 m² of new or restored habitat must be created (DFO 2022). As requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish habitat offsetting to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans. Since the information is forthcoming, it will be considered in subsequent regulatory or Project Development processes and incorporated as appropriate in the development of the operational management plans for the Project. The management

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					plans that will be in place for the Project aimed at protecting Fish and Fish habitat will have measures to adapt to incorporate new information at any time whether that be from the OW, other Indigenous Nations, regulatory agencies and/or from ongoing monitoring.
OW-115	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4	NA	Resolve misalignment of Proponent monitoring post-Project closure (50 years) and contaminant life cycles (> 100 years). Monitoring should also include tissue contaminant levels to assess safety for consumption and potential bioaccumulation.	Telkwa Mining acknowledges that the comment is closed, and no further response is required.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-116	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4	NA	Provide more up-to-date and detailed baseline information on fish and fish habitat in environmental conditions representative of typical conditions. Assumptions on impacts, or a lack thereof, to fish and fish habitat are based on extremely flawed and incomplete studies. Studies should occur in all potentially affected watercourses and occur across multiple seasons;	Telkwa Mining acknowledges the comment. Please see Attachment OW-022-1 . The comment raised regarding the apparent discrepancies between historical and current fish community data within the Project area is acknowledged. While it is true that Chinook Salmon, Pink Salmon, and Bull Trout were not observed during recent surveys, this absence should not be interpreted as definitive evidence of a shift in community composition or the loss of these species from the system. These species are anadromous which means that their presence in freshwater systems is typically limited to specific life stages – primarily adult spawning migrations. The timing and frequency of these migrations can vary significantly by species and watershed. For example, Pink Salmon exhibit a strict two-year spawning cycle, meaning that surveys conducted in off- cycle years would not detect their presence. Similarly, spawning runs can be missed if surveys do not align precisely with the timing of fish migration and spawning activity. Therefore, the lack of recent

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			observations is more likely attributed to survey timing and interannual variability rather than a true absence of these species. There are no known barriers between the Telkwa River, Goathorn Creek, and Tenas Creek that would prevent fish passage. Therefore, it remains reasonable that these systems continue to provide accessible habitat for anadromous species, including Steelhead, Bull Trout, Chinook Salmon, and Pink Salmon. It is understood that additional data is being requested to further characterize the presence and habitat use of fall-spawning salmonids. Even though the data in the Application is sufficient for the EA process, Telkwa Mining has planned a targeted fall spawner survey program in 2025. This program will include systematic bank walks throughout the spawning window for Chinook Salmon, Pink Salmon, and Bull Trout. Site selection for these surveys will be informed by the results of the proposed summer habitat assessments, ensuring that efforts are focused on areas with the highest potential for spawning activity. It is important to note that Steelhead spawning occurs in the spring and will therefore require a separate survey. However, given the low success rate of previous Steelhead spawning surveys, it is more appropriate that a spawning habitat survey be conducted instead. As requested by OW, Telkwa Mining will discuss appropriate

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					incorporation of the results of forthcoming information related to modern fish surveys to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-117	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7:	NA	Develop high quality restoration plans for assessment by OW and the Houses, including design of the plan, the selection of species, development of measurable indicators for restoration success and clearly defined objectives including ecosystem productivity. The Proponent should commit to undertake restoration activities until objectives are achieved.	Under the Fisheries Act, proponents are required to provide a Letter of Credit to guarantee the implementation of offsetting measures for fish habitat. The Letter of Credit is provided to Fisheries and Oceans Canada, and the proponent remains responsible until it is confirmed that the offsetting goals have been fully met. These measure, once implemented, must be monitored over several years to ensure they are effective and sustainable. An updated offsetting program will be shared and developed during the permitting process that will aim to: • Create additional overwintering habitat and addressing connectivity issues for Four Creek to restore damage from logging and road building; • Add additional off-channel habitat to lower quality and heavily logged reaches of upper Goathorn Creek and its tributaries; and/or • Addressing severe habitat impacts due to agriculture in Helps Creek. Any potential offsetting will be approved by the DFO and designed in collaboration with the OW to provide indigenous knowledge and input, as well as professional biologists and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			professional engineers/geoscientists that are experienced in habitat restoration. This will occur during the permitting process. Part of the design process will involve conducting studies and analysis to characterize physical processes that pose a risk to offsetting (e.g., flood magnitudes, sediment transport dynamics, groundwater-surface water interactions). As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to fish habitat offsetting to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-118	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4	NA	Commit to appropriate planning for contaminant areas, which requires a proactive approach to mitigating contaminant leakage (rather than attempting to mitigate once problems have been identified);	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Telkwa Mining is committed to developing detailed liner designs, construction methodologies and monitoring to ensure that the liner systems installed for the management and control ponds limit seepage to the modelled values provided in the Final Water and Load Balance Report. Please refer to Attachment OW-118-1 for the Liner Design memo completed by SRK. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-119	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4	NA	Plan for the cases of catastrophic failures, including the quantification of potential impacts to fish and fish habitat;	As part of the Tenas Project's Environmental Assessment Certificate (EAC) Application, a Dam Breach Assessment was completed by SRK (Attachment OW-119-1). The assessment modelled two critical failure scenarios (sunny-day and rainy-day) of West, North, East and Tenas Dams to identify the local and regional impacts of water and sediment released into receiving watercourses. Effects to fish and fish habitat were provided in the EA Application and included: • Scouring of channel bed and banks, • Displacement of fish, • Degradation of spawning habitat, • Release of acidic or metal-laden water and acid-generating (PAG) substrates, and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			The mapped disturbance area is estimated to be less than 10 km² and restoration is considered feasible. To address this comment from the OW, Telkwa Mining will prepare a technical memorandum during Project development. The memorandum will discuss available existing importation including fluvial geomorphology, hydrology, habitat mapping, water quality and biological monitoring to outline unplanned post-breach restoration strategies. The memorandum will also discuss potential emergency protocols that address aquatic impacts and ecological resilience. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of forthcoming information related to quantification of catastrophic failures on fish and fish habitat to Indigenous interests or Indigenous nations into Project design, monitoring, mitigation, and adaptive management plans.
OW-120	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4	NA	Consider the appropriateness of water and load balance models and correct seepage migration rates and timing of peak contaminant concentrations;	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. SRK is addressing the last part of this IR related to “Consider the appropriateness of water and load balance models and correct seepage migration rates and timing of peak contaminant concentrations;”. SRK uses standard and accepted practices that integrate inputs

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			from regional groundwater models into the water and load balance model to represent the changes from mine activity to the stream flow and water quality, combining groundwater inputs and rainfall runoff model for each creek. More information on how these are linked together can be found in IR OW-038 and in Attachment OW-038-1. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-121	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2:	NA	Consider potential impacts to Wet'suwet'en health and safety through the bioaccumulation of contaminants (e.g., selenium) through aquatic food webs into non-anadromous fish such as rainbow trout.	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-121-1 which provides the Human Health Risk Assessment completed for the EAC application which indicates a low risk for Indigenous peoples health. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-122	NEW	Environment Section 4 Chapter 1: Atmospheric	Surface Water, Ground Water, and Aquatic Resources	Provide the cited document in Appendix D: "SRK 2024a" (page 16), which is missing from the end of	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		the document under "References". Appendix A-Water and Load Balance Model Report.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-039. Please refer to Attachment OW-038-1 for the Final Water and Load Balance Report. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-123	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife	Surface Water, Ground Water, and Aquatic Resources	Update the Discharge Management Plan - Calcite Precipitation document to include -How operation and a post-closure increase in conductivity in ponds and the receiving environment affect the Saturation Indices (SI) for calcite, and predictions for precipitation; -Accounting for higher pCO₂ in groundwater, which is more likely to precipitate calcite; -Further accounting for increased calcite precipitation in instances where alkalinity and magnesium in the water increase; and -A separate calcite monitoring and management plan, which considers possible impacts and interactions of the use of antiscalants for reducing calcite precipitation, considering the high background conditions of aluminum in these watersheds.	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-049.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 9: Avian Species.			
OW-124	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation	Surface Water, Ground Water, and Aquatic Resources	Provide additional information and figures for the Water and Load Balance Model Report that we have not been able to locate, including: -Final figures presented in “Attachment IR 356-1 as the attachment with that name at the end of App F contains no information; -Figures for each of the requested scenarios in the IR (Tributary receiving discharge above confluence with Goathorn Creek, and Goathorn Creek below confluence with tributary receiving discharge) and projected water quality from baseline through to post-closure; -Updated figures from the WLBM report (Fig 2.2-2.4 of App 4.3) that originally showed incorrect connections of the three creeks (Four Creek, Tenas Creek, Goathorn Creek); and -TML’s response to the IR, labelled “Final EA Water and Load Balance results”, or Attachment IR 356-1.	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Please see responses to comment IDs OW-040 and OW-041. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			
OW-125	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4 Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat	Surface Water, Ground Water, and Aquatic Resources	Use climate change predictions in the understanding of potential impacts throughout the operation and post-closure periods (e.g., changes in flow and changes in stream temperature due to changes in flow and air temperature).	Telkwa Mining acknowledges the comment. Please see complete response and figures/tables to this comment in the SRK memo [Tenas Project Information Request Responses from OW memo, SRK June 2025] Attachment OW-011-1. Climate change is included in the Water and Load Balance model for the Project using modelled climate rate of change to precipitation and temperature as inputs to the WLBM, according to the latest IPCC report (AR6) and latest available GCMs (global circulation models), as described in Attachments OW-125-1 and OW-038-1. It also includes climate change impacts to runoff (in the streams) and evaporation. An excerpt from the report (Attachment OW-125-1) describing the work follows: “This climate change assessment was based on results from GCMs included in CMIP6 and the corresponding IPCC Sixth Assessment Report (AR6) (Masson-Delmotte, 2021).” “Climate change scenarios for RCP4.5, RCP6.5 and RCP8.5 were evaluated for the Project Area. The effects of the RCP4.5 scenario were used to generate mean annual and monthly temperature and precipitation correction factors, which also affect runoff and evaporation rates...” Climate (daily precipitation and temperature) was adjusted in the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.			WLBM until the end of the model simulation (2100) with adjustment factors as described in Attachment OW-038-1. Further, climate inputs are drivers of the streamflow modeling in the water balance model, through the rainfall-runoff models for each stream. Effects of climate change on streamflow is therefore carried forward through the adjustments to temperature and precipitation. Change in temperature in the streams was evaluated in a mass balance approach, external to the WLBM, based on baseline temperature data for Goathorn Creek and assuming that temperature for the effluent water is equal to the air temperature (corresponding to the maximum air temperature from the WLBM). The maximum air temperature from the WLBM accounts for climate change. The use of air temperature as a proxy for effluent temperature is considered conservative and therefore the change in temperature recorded in the creek is expected to be conservative as well. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-126	NEW	Environment Section 4 Chapter 1: Atmospheric Environment Section 4	Surface Water, Ground Water, and Aquatic Resources	Resolve outstanding technical questions regarding PAG Rock management and seepage including: -If PAG rock is to be submerged prior to the onset of ARD/ML, why would seepage tailings facilities contain the products of ARD/ML?	Telkwa Mining acknowledges the comment. 1. As provided in Attachment OW-049-1, rock will oxidize prior to placement in the management pond. Stored oxidation products from weathering of the rock prior to placement in the management ponds will be flushed during placement. The flushed oxidation products can dissolve in water stored in the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Chapter 2: Terrestrial Environment Section 4 Chapter 3: Surface Water Section 4 Chapter 4: Ground Water Section 4 Chapter 5: Aquatic Resources Section 4 Chapter 6: Fish and Fish Habitat Section 4 Chapter 7: Vegetation Section 4 Chapter 8: Wildlife Section 4 Chapter 9: Avian Species.		-How much seepage is expected out of tailings facilities, both in groundwater and in surface water?	management ponds. However, this is not acid rock drainage (ARD). It is weathering prior to the onset of acidic conditions. The PAG management strategy is to place rock in the management ponds prior to the onset of acidic conditions. If acidic conditions occur, this will result in increased element leaching and acidity that would require treatment prior to discharge. Once the rock is submerged and no longer in contact with atmospheric oxygen, oxidation of the rock will be very limited. This will result in limited weathering product production and prevent acidic conditions from occurring. Water covers have been used extensively at numerous mines as a successful mitigation strategy for the prevention of ARD. 2. Attachment OW-049-1 provides seepage and surface water discharges from the management ponds over the life of the Project. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-127	NEW	Accidents, Malfunctions, And Effects of	Accidents and Malfunctions	The assessment of impacts from accidents and malfunctions requires a more thorough, Indigenous-centered and community-informed	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Accidents and Malfunctions in the EAC Application consistent with the

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.		analysis of the proximity and sensitivity of Indigenous values to accidents and malfunctions. This assessment also requires inputs from Wet'suwet'en to determine the sensitivity of Indigenous values using appropriate indicators, measures, and thresholds for impacts. Such values may include, but are not limited to: The assessment of impacts from accidents and malfunctions requires a more thorough, Indigenous-centered and community-informed analysis of the proximity and sensitivity of Indigenous values to accidents and malfunctions. This assessment also requires inputs from Wet'suwet'en to determine the sensitivity of Indigenous values using appropriate indicators, measures, and thresholds for impacts. Such values may include, but are not limited to: Waterbodies, including aquifers, lakes, rivers, creeks, and marine areas of value to Indigenous communities, Fish, Wildlife, Plant resources, Traditional economy and resource use, Rare ecosystems, Travel corridors, harvesting site access, and important environmental sites, Agriculture, Wellbeing, Cultural sites, Heritage resources, Governance and stewardship, Indigenous Rights.	Application Information Requirements issued by the EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-128	NEW	Accidents, Malfunctions,	Accidents and Malfunctions	Provide more information on the duration and magnitude of effects due to hazardous spills on	Telkwa Mining acknowledges the comment.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.		land and water, including science-based evidence of the duration of remediation and restoration processes for all potential spill volumes.	Please refer to EAO EAC Application, S9.0 Accidents and Malfunctions, May 2022, Version 1.0. S9.0, which provides an assessment of both the duration and magnitude of spills (Attachment OW-020-2). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-129	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Provide more community-based information on the duration and magnitude of impacts due to perceived contamination for its ability to cause avoidance and hence adversely affect traditional resource, land, and water use and rights.	Telkwa Mining acknowledges the comment from OW. Telkwa Mining undertook the assessment of Accidents and Malfunctions in the EAC Application consistent with the Application Information Requirements issued by the EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-130	NEW	Accidents, Malfunctions, And Effects of	Accidents and Malfunctions	Provide evidence of the likelihood and implications of altered terrestrial and aquatic wildlife population dynamics in the event of a hazardous spill on land	Telkwa Mining acknowledges the comment. Please refer to EAO EAC Application, S9.0 Accidents and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.		or water, and of the magnitude and duration of impacts to these resources.	Malfunctions, May 2022, Version 1.0. S9.0, which provides an assessment of both the likelihood and implication of hazardous spills on terrestrial and aquatic species (Attachment OW-020-2). Telkwa Mining undertook the assessment of Accidents and Malfunctions in the EAC Application consistent with the Application Information Requirements issued by the EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-131	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Provide a more thorough, systematic analysis of the likeliness and effectiveness of mitigation measures to address impacts from all potential accident and malfunction scenarios.	Telkwa Mining acknowledges the comment. Monitoring programs will measure the effectiveness of mitigation measures, as described within each management plan. Adaptive management plans are included that provide a strategy to apply in the event that original predictions of effects and mitigation effectiveness are not as expected. Various plans included with the EAC Application address risks related to accidents and malfunctions, including the Mine Emergency Response Plan (Attachment OW-008-1) and the Fuel Management and Spill Control Plan (Chapter 7.0 in Section 13.0, Management Plans of the EAC; Attachment OW-008-1). Note that these plans are required as part of the Mines Act/Environmental Management Act permitting process, which occurs after the environmental assessment.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-132	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Provide Statistical modelling of accident scenarios and of the likely effectiveness and duration of remediation processes.	Telkwa Mining acknowledges the comment. Telkwa Mining has conducted the assessment in the EAC Application consistent with the Application Information Requirements issued by the EAO. Additional information for the consequence of an embankment breach is provided in Appendix 1.0-AA (Attachment OW-119-1), Overview of Project Proponent Description, of the EAC Application modelling for the downstream. The release of water and materials from the Tenas Control Pond is considered the worst-case scenario, in which the volume of water released could be up to the combined maximum storage in the three management ponds. The primary portion of the management ponds have been designed with upstream and downstream slopes of H:V (slope ratio horizontal to vertical) 2.5H:1V and 3H:1V, respectively. A toe buttress structure of 5.5H:1V has been added to the management and control pond embankments on the downstream side that are higher than 6 m and it is placed at roughly 50% of the height of the main embankment. Integrated stability analyses for the management pond and Tenas Control Pond embankment structures are discussed in S1.0 of the EAC Application. The structures have been designed to meet a minimum static FOS of 1.60 versus the guideline value of 1.50 and a pseudo-static FOS of 1.05, which matches the guideline

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					value in accordance with suggested stability design criteria (Hawley and Cuning 2017). As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-133	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Provide evaluation of impacts related to water flow and level in the context of climate scenarios, showing how the impacts of climate change may affect the outcomes of accidents and malfunctions.	Telkwa Mining acknowledges the comment. The design of the ponds considered both low flow and dry climate conditions using a water balance model over a long period of time. Please refer to Attachment 350-1 (OW-038-1). As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-134	NEW	Accidents, Malfunctions, And Effects of The Environment	Accidents and Malfunctions	Provide more detailed information regarding impacts in various Project phases.	Telkwa Mining acknowledges the comment. Telkwa Mining acknowledges the comment from OW. Telkwa Mining undertook the assessment of Accidents and Malfunctions in the EAC Application consistent with the Application Information Requirements issued by the EAO (2020). Please refer

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.			to Attachment OW-020-2 that explains the duration and magnitude of effects of hazardous spills on land and water and impacts in various Project phases. As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-135	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Provide evaluation of risks due to accidents and malfunctions in the context of cumulative impacts to Wet'suwet'en rights and interests	Telkwa Mining acknowledges the comment. A risk assessment was completed by Telkwa Mining in collaboration with a Qualified Professional. The assessment undertaken was consistent with the Application Information Requirements established by the EAO (2020). It included consideration of the context of the Project, which incorporates all past and present effects to date. As needed, Telkwa Mining is willing to work with the OW to provide additional requested information during Project development. Telkwa Mining will continue to incorporate Indigenous Values and Knowledge into Project development, including measures to mitigate the potential effects of accidents and malfunctions.
OW-136	NEW	Accidents, Malfunctions, And Effects of The	Accidents and Malfunctions	A summary table should be provided that presents all characterizations for each of the event types and associated VC interactions, so that all characterizations can be considered together.	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-136-1 that provides the summary table requested by the OW.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.			
OW-137	NEW	Accidents, Malfunctions, And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.	Accidents and Malfunctions	Additionally, response plans should be developed in close collaboration with Indigenous communities and should include responses and adaptive management strategies that account for Indigenous needs and perspectives. OW requires more consent-based involvement in developing environmental management and monitoring	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and CWB Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and the OW.
OW-138	NEW	General	NA	N/A - comment only	Telkwa Mining acknowledges the comment. Telkwa Mining will work with the EAO, the OW and House Groups to meaningfully address Wet'suwet'en concerns, including adapting Project components and mitigation measures where appropriate. This is inclusive of all outstanding issues and information requests

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					outlined in the OW Environmental Assessment Status Report On Telkwa Mining Limited's Tenas Coal Mine (issued March 12, 2025) and in the OW's comments on recent IR responses regarding caribou under comments IDs OW-026 and 029 and aquatic resources under comments comment IDs OW-035 to OW-056. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and CWB Study (now called the Wet'suwet'en Wellbeing Study) into Project design, monitoring, mitigation, and adaptive management plans with EAO and the OW.
OW-139	NEW	General	NA	N/A - comment only	Telkwa Mining acknowledges the comment. Please see response to comment ID OW-059.
OW-140	NEW	Appendix D - Information Requirement Response — Impact of Upgraded Recreational Access on the Telkwa Mountain Caribou Subpopulation	Recreational Access Construction of the bridge over Tenas Creek has significant potential to increase recreational access to the Telkwa mountains resulting in displacement of caribou from core habitat. This issue was pointed out to the proponent and discussed in pre-application meetings; however, I do not see	As noted in greater detail in our IR responses, we request documentation of the additional communications that occurred between TML, ECCC, and WLRS that lead to the identification and characterization of impacts and responses. We also request that this be done for all current and future IRs related to this Project as this will provide the necessary context and transparency that OW needs to track and evaluate how the Proponent is addressing OW and other intervenor concerns.	Telkwa Mining acknowledges the comment. This request was in relation to the Project Access Management Plan. In summary, Telkwa Mining did not meet with either ECCC or WLRS on this plan. Discussions were held with BC Recreation and Parks to ensure that access was maintained to Hunter's Basin for the public. In total, Telkwa Mining held three meetings with BC Recreation and Parks with one of these meetings consisting of both Parks and a representative from the not-for-profit society BV Backpackers.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
			mention of it in the application. EA Information Requirement: Include a description of increased access to the Telkwa mountains resulting from mine development, recommend mitigation and assess impacts to Telkwa Caribou Herd.		
OW-141	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs. P. 2	GHG	Please revise the GHG emissions assessment to provide a cumulative estimate of total project-related GHG emissions over all relevant project phases, including: 1. Construction, 2. Operations (with expected emissions per year), 3. Reclamation and closure, and 4. Post-closure care and maintenance (as applicable). Where appropriate, clearly identify key assumptions and expected trends in emissions across project phases. Consider presenting the data graphically (e.g., a bar chart of annual emissions by year) to support clarity and interpretation.	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project planning and development. Please refer to BC EAO EAC Application - Tenas Project, Section 4.0 Environmental Affects Assessment, Chapter 1 Atmospheric Environment Valued Component, Section 6.2 for the Cumulative Effects Assessment (Attachment OW-141-1). While all phases of the Project have the potential to result in effects to the Atmospheric Environment VC, the Operation Phase is expected to have the greatest effects. Therefore, the assessment focused on the Operation Phase. Predicted effects associated with the Operation Phase encompass any potential

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					effects during the Construction, Decommissioning and Reclamation, and Post-closure phases, and are effectively captured through the assessment of the Operation Phase. Please refer to BC EAO EAC Application - Tenas Project, 4.1-B Air Quality Report. for the Air Quality modelling assumptions (Attachment OW-141-2). In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addresses the outstanding items identified related to GHG, please see Attachment OW-141-3 Sections 2.0 and 3.0 as requested by Points 1 through 4. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-142	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs, general	GHG	Please clarify whether Scope 3 emissions were considered in the GHG assessment. If they were not: 1. Provide a rationale for their exclusion and describe any assumptions regarding coal end-use. 2. Consider including a qualitative or order-of-magnitude estimate of downstream emissions (e.g., based on emissions per tonne of coal combusted for metallurgical purposes). 3. Discuss the implications of downstream	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project development. In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addressed the outstanding items identified related to GHG, please see

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				emissions for climate policy alignment, especially under evolving net-zero transition expectations and CleanBC industrial climate policy.	Attachment OW-141-3 Sections 1.3, and 2.1 which covers Alignment with CleanBC Industrial Emissions Policy. The Project aligns with provincial and national goals. as requested by Point 1. Please see Attachment OW-141-3 Section 2.3, Table 4 covers Scope 3 emissions including those from the downstream use of coal as requested by Point 2. Please see Attachment OW-141-3 Section 3.4 as requested by Point 3.
OW-143	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs, p. 2	GHG	Please revise the submission to: 1. Describe how project emissions align with the BC government's GHG emissions reduction plans for the mining or industrial sector (as applicable). 2. Identify whether the emissions from this project have been accounted for within sectoral carbon budgets or policy assumptions under CleanBC. 3. Discuss potential trade-offs or implications for other projects or sectors if this project proceeds with the current emissions profile.	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project development. In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addressed the outstanding items identified related to GHG, please see Attachment OW-141-3 Sections 1.3, 2.1, and 2.5 for context and the implementation of BC OBPS, as requested by Point 1. Please see Attachment OW-141-3, where monitoring and continuous improvement covered in Section 5.0, as requested by Point 2. Please see Attachment OW-141-3, the Project's emissions will

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					count toward the provincial total. By proactively adopting a combination of emissions reductions option 5 (Section 4.0), the Project helps manage cumulative emissions risk. The low emission intensity of the project will be used to compare other projects in the sector, as requested by Point 3.
OW-144	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs, p. 2	GHG	Please revise the submission to provide a clear and specific net-zero or decarbonization plan for the project. This should include: - Interim emissions reduction milestones (e.g., 2030, 2040), - Measures and technologies that will be implemented to reduce emissions over time, - Key decision points or updates (e.g., incorporation of new technologies or regulatory changes), - Plans for monitoring progress and adapting if targets are not met. 5. Where possible, provide this information in a dedicated decarbonization planning section or through an attached Net-Zero Transition Plan consistent with CleanBC guidance.	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project development. In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addressed the outstanding items identified related to GHG, please see Attachment OW-141-3 Section 3, Figure 6, as requested by Point 1. Please see Attachment OW-141-3 where emission reduction technologies are discussed in Section 4.0, as requested by Point 2. Please see Attachment OW-141-3 where monitoring and continuous improvement covered in Section 5.0, as requested by Points 3 and 4. Please see Attachment OW-141-3, the dedicated

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					decarbonization planning section provided in Section 4.0 and Appendix B in Attachment OW-143-1, as requested by Point 5.
OW-145	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs, general	GHG	Please revise the GHG mitigation section to include an adaptive management framework that: 1. Defines key indicators to monitor the effectiveness of mitigation measures, 2. Identifies thresholds or targets that would trigger corrective actions, 3. Describes a process for regularly reviewing and updating mitigation plans (e.g., in response to new technologies or updated policy guidance), 4. Includes engagement with regulators, Wet'suwet'en, and/or stakeholders in monitoring and updates.	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project development. In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addressed the outstanding items identified related to GHG, please see Attachment OW-141-3, Section 5.0 as requested by Points 1 through 4.
OW-146	NEW	2024 11 15 Ltr TML IR Response - Transition Order Sched A Section C pt 6 - GHGs, p. 3	GHG	Please revise the submission to: 1. Provide a quantitative estimate of carbon sink loss due to clearing and land disturbance, including GHGs released from soil and vegetation during project development. 2. Estimate the GHG sequestration potential of proposed reclamation activities (e.g., afforestation, revegetation, restorative agriculture), including timelines for achieving pre-disturbance equivalency. 3. Discuss the time lag between carbon loss and sequestration, and its implications for the project's overall GHG profile.	Telkwa Mining acknowledges the comment. Telkwa Mining undertook the assessment of Atmospheric Environment in the EAC Application consistent with the Application Information Requirements issued by the BC EAO (2020). As needed, Telkwa Mining is willing to work with the OW to provide information during Project development. In the spirit of increased collaboration with First Nations, Telkwa Mining contracted Ausenco to provide a report that addresses the outstanding items identified related to GHG. Please see Attachment OW-141-3. Section 3.6 includes estimates of carbon sources and sinks including Table 8 and Figure 5 for sequestration loss and a discussion of sequestration/recovery

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				4. Consider and describe potential offset strategies, including culturally relevant offsets, to address residual or interim emissions that cannot be mitigated immediately through reclamation.	during reclamation and closure, as requested by Points 1, 2, and 3. Please see Attachment OW-141-3. Facilities that operate below their regulated benchmark may generate surplus units or credits that can be sold. Limited use of carbon offsets is also permitted for compliance, but they need to meet the requirements specified in the regulations. The Project is expected to be a covered facility under the BC OBPS, as outlined in the 2025 CleanBC Industrial Incentive Program. See Section 3.6, as requested by Point 4.
OW-147	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+)	GBA+	Please revise the submission to: 1. Add more information regarding the location of the interviews with service organizations, if there interviews were conducted on-site. 2. if the interviews were conducted virtually, revise the title from "Field Research" to "Community Outreach with Service Providers" to accurately reflect the methodology. 2. Add the information about the mission and activities of each listed organization in Table 1 on p. 6. 3. Add the titles of organizations the interviewees represent and their location.	Telkwa Mining acknowledges the comment. 1) The interviews were conducted in person at the service organization locations in Smithers and Houston. 2) Information about the activities of each organization interviewed were added to Table 1 in the Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). 3) The titles of the organization that the interviewees represent and their locations are available in Appendix A1 in the Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-2). As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-148	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 17, pp. 20-24	GBA+	Please revise the submission to: 1. Add relevant information from the interviews to the sections that rely on grey literature. 2. If no information was gathered from the interviews of a particular topic, this should be stated explicitly. 3. Supplement secondary data with interview data where applicable. 4. Indicate when no relevant information from interviews was obtained. 5. Incorporate the input from multiple interviewees consistently throughout the report where applicable.	Telkwa Mining acknowledges the comment. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that, as additional information is provided by OW, the information may inform conclusions on the Project and potentially on the proposed conditions, including management plans. The Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1) presents all information obtained during interviews where relevant, available, and appropriate. The absence of interview-based information on a particular subject indicates that no related input was available. A list of interview questions used during the field work is provided in Appendix A3 in the report provided in the Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-149	NEW	2025 03 04 LTR - TML - Transition order Schedule A	GBA+	Please add a plan for prioritizing the hiring and training of Indigenous peoples, including Indigenous women, into high-paying skilled jobs.	Telkwa Mining acknowledges the comment. Telkwa Mining will focus on equity deserving groups including Indigenous Peoples and women for additional support via mentorship and career

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		section C point 3 Effects (GBA+)		The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	discussions to facilitate moving these groups into skilled, technical, and/or supervisory positions. The support will focus on training and assigning dedicated mentors to these employees when they are employed by the Project. As the Project develops, a plan will be developed collaboratively with identified groups to ensure equity deserving groups have the best opportunities for progressing and/or obtaining skilled, technical, and/or supervisory positions with the Project. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP (Attachment OW-008-1). Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-150	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 27	GBA+	On p. 27, please add the acknowledgement of how challenges related to household duties and childcare are more exacerbated for Indigenous women. 2. On p. 27, include a plan that addresses the promotion of employment opportunities and training for women in their workforce. 3. On p. 27, add the acknowledgement that hiring and promotion of Indigenous peoples and women are the project's priorities.	Telkwa Mining acknowledges the comment. Acknowledgement of how Indigenous women experience challenges related to household duties and childcare more acutely than others is added to Section 3.1 in the Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). During Project development, a plan will be developed collaboratively with the identified groups including Indigenous

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	women to ensure equity-deserving groups understand what employment opportunities are available, including training and career progression. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP (Attachment OW-008-1). Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. As requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-151	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 28	GBA+	In the section Community Infrastructure and Services on p. 28, please add the breakdown of on-reserve Indigenous communities versus off-reserve Indigenous communities. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use	Telkwa Mining acknowledges the comment. Details of on-reserve and off-reserve Indigenous populations and infrastructure as well as services available on reserve are included in the 2022 EAC Application submission (Attachment OW-151-1 and OW-151-2). Telkwa Mining welcomes further details on the distinct challenges experienced by individuals living on-reserve compared to those living off-reserve to support appropriate information being made available to inform decisions by OW and EAO on the Project.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining is committed to working with the OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that, as additional information is provided by OW, that information may inform conclusions on the Project and the proposed conditions, including management plans.
OW-152	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 29	GBA+	Please revise the Housing section on p. 29 to be reframed in a way that addresses local/regional contexts. In addition, this section needs to include the comparison between the provinces if required. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully	Telkwa Mining acknowledges the comment. Relevant information regarding the local/regional contexts of housing conditions in Smithers, Telkwa, Houston, and Witset are provided in Section 2.5.2 in the Revised Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the Project and proposed conditions, including management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-153	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 30	GBA+	In section Crime and Public Safety on p. 30, please add a statement that provides evidence demonstrating the lower risks associated with the absence of work camps for this project. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully	Telkwa Mining acknowledges the comment. A statement providing evidence demonstrating the lower risks associated with the absence of work camps has been added to Section 3.3 in the Revised Tenas EA Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1). Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the Project and potentially proposed conditions, including management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-154	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 31	GBA+	On p. 31, add other socioeconomic impacts related to resource extraction projects, which disproportionately affect Indigenous women, such as an increase in sex work, sexually related criminal offences, and unsafe sexual transactions. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining acknowledges the comment. Other socioeconomic impacts related to resource extraction projects on women and girls, including Indigenous women and girls, are noted in Section 3.3, Crime and Public Safety, of the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report(Attachment OW-005-1). The section identifies binge drinking, drug use, and unsafe sexual practices, increased rates of sexual assault and sexually transmitted infections as socioeconomic impacts associated with work camps and long shifts that occurred in resource communities. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward to the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the project and proposed conditions, including management plans.
OW-155	NEW	2025 03 04 LTR - TML - Transition	GBA+	The Community Health and Wellbeing section on p. 32 needs to be reframed in a way that addresses	Telkwa Mining acknowledges the comment. The local/regional context is covered in Section 4.2.1 in S6.0-C5 of the 2022 EAC

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		order Schedule A section C point 3 Effects (GBA+), p. 32		local/regional contexts. In addition, this section needs to include the comparison between the provinces if required. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Application submission (Attachment OW-155-1), where existing community health and well-being indicators such as the Community Well-being Index for Smithers, Telkwa, Houston, and Witset are discussed. Section 3.4 in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report provides analysis of Project effects on equity-deserving groups (Attachment OW-005-1). Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the project and proposed conditions, including management plans."
OW-156	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 33	GBA+	On p. 33, please revise the assessment of impacts of food security on vulnerable groups such as women and seniors by including all affected populations in the assessment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in	Telkwa Mining acknowledges the comment. The local/regional context is covered in Section 2.7.2 on Food Security in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1). The section also describes the existing conditions for low-income households, people with disabilities and people with moderate to severe mental health challenges, which could include women and seniors. Section

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	3.4.2 on Food Security in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1), identifies an increase in housing costs as a key project-related driver of food insecurity and makes a clear cross-reference to the cost-of-living effects section that precedes it. The cost-of-living section clearly identifies the vulnerable groups noted by the reviewer as being potentially at risk of food insecurity. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the project and proposed conditions, including management plans."
OW-157	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 34	GBA+	Please revise the submission to provide the contextual basis for the statement regarding socioeconomic issues experienced by Indigenous peoples on p. 34 or remove the sentence. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML	Telkwa Mining acknowledges the comment. Other socioeconomic impacts related to resource extraction projects on women and girls, including Indigenous women and girls, are noted in Section 3.3, Crime and Public Safety, of the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1). The section identifies binge drinking, drug use, and unsafe sexual practices, increased rates of sexual assault and sexually transmitted infections as socioeconomic impacts associated with work camps and long shifts that occurred in resource communities. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project. Telkwa Mining

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	recognizes that as additional information is provided by OW, that information may inform conclusions on the Project and proposed conditions, including management plans.
OW-158	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 36	GBA+	Please revise the submission to so that it includes consideration of development of a Gender and Culture Safety Plan in conjunction with the Wet'suwet'en in addition to Bathurst Resources Ltd. intersectional corporate policies. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures.	Telkwa Mining acknowledges the comment. Telkwa Mining is committed to developing a gender and culture management plan in collaboration with various equity-deserving groups including OW during the development of the Project. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-159	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 40	GBA+	On p. 40, please provide enhanced strategies for identifying and reducing barriers faced by equity-deserving groups in employment and training by incorporating implementation plans, response mechanisms, and accountability measures where gaps are identified. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully	Telkwa Mining acknowledges the comment. Enhanced strategies will be developed as part of management plan development during the development of the Project to identify and reduce barriers faced by equity-deserving groups. The plan will be developed collaboratively with identified groups, especially Indigenous Peoples, and women, to ensure equity-deserving groups have an equal, real, and identified opportunities for progressing and/or obtaining skilled, technical, and/or supervisory positions with the Project. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Project Environmental Assessment Certificate. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the Project and potentially proposed conditions, including management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-160	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 41	GBA+	Please revise the submission to: 1. On p. 41, provide clarification to the statement about the incentives to Indigenous groups to encourage the development of additional housing stock/supply and elaborate on the nature of the incentives. 2. On p. 41, provide clarification to the statement about consideration of the equity-deserving populations in any housing developed by Telkwa Mining. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully	Telkwa Mining acknowledges the comment. Telkwa Mining is committed to providing \$1 million to support housing initiatives contingent on obtaining \$3 million in additional funding to assist with the same initiatives from government and nongovernment sources. Specific housing activities will be selected based on a ranking system to be developed in collaboration with local Indigenous and community groups. At least one of the criteria will be aimed at ensuring representation of equity-deserving populations in the selection process. This has been updated in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1). Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-161	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 44	GBA+	On p. 44, please include the clarification regarding the funding and its duration in the statement about developing and implementing Community Engagement Programs as part of the Socio-economic Management Plan (SEMP).	Telkwa Mining acknowledges the comment. Telkwa Mining will fund community engagement programs for employees, local communities, and other interested parties during the Construction, Operation, and Decommissioning and Reclamation phases of the Project (approximately 25 years). The community engagement program at a high-level will be part of the role profile for the Mine Manager, Indigenous Superintendent, and Environmental Coordinator. Twice a year, presentations will be delivered with various Indigenous Nations and stakeholders to provide Project updates, gather feedback, and answer questions. The same information will be posted on the Project's website and will be part of the annual report to regulatory agencies. Furthermore, Telkwa Mining will maintain an open-door policy for any groups that wish to engage with the Project. This has been updated in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report (Attachment OW-005-1). Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. As requested by OW, Telkwa Mining will consider any

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-162	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 46	GBA+	Please revise the submission to: 1. On p. 4, include the clarification regarding the funding and its duration in the statement about supporting Telkwa Elementary and Witset School with breakfast for students during the Project Operation phase.	Telkwa Mining acknowledges the comment. Telkwa Mining will provide support and funding for breakfast programs at Telkwa Elementary and Witset School during the Project Operation phase (approximately 20 years), contingent on securing government and nongovernment partners to assist with 50% of the delivery of these programs. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. This has been updated in the Revised Tenas Project Transition Order: Gender Based Analysis Plus Report(Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-163	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 47	GBA+	Please revise the submission to: 1. On p. 47, expand the focus on training opportunities for under-represented groups by adding the training for employment advancement.	Telkwa Mining acknowledges the comment. This has been updated in the Revised Tenas Project Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the Project and potentially proposed conditions, including management plans.
OW-164	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 49	GBA+	Please revise the submission to: 1. On p. 49, clarify whether the training for women and other under-represented groups leads to permanent employment.	Telkwa Mining acknowledges the comment. Telkwa Mining is committed to providing training opportunities to women and other under-represented groups to help build skills and improve access to employment. While participation in training does not guarantee permanent employment with Telkwa Mining, the training is intended to enhance employability and support long-term career development within the industry. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. This has been updated in the Revised Tenas Project Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-165	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 54	GBA+	Please revise the submission to: 1. On p. 54, include the clarification regarding the funding and its duration in the statement about financial education programs for employees.	Telkwa Mining acknowledges the comment. Telkwa Mining will provide and fund financial education programs for employees during the Project Operation phase (approximately 20 years) to support general financial literacy, help employees and their families develop personal financial management skills, and encourage retirement planning and saving. The program is part of the overall suite of benefits provided to employees and their families up to two training sessions per employee per annum. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. This has been updated in the Revised Tenas Project Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-166	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3	GBA+	Please revise the Health and Wellness Program column on p. 58 to include the details such as funding sources and responsibility, the duration of	Telkwa Mining acknowledges the comment. Telkwa Mining will fund the Health and Wellness program during the Operation phase (approximately 20 years) of the Project as part of the overall suite of benefits provided to employees and their families

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		Effects (GBA+), p. 58		time for the program to be in existence, communications plans and reporting mechanisms.	up to a maximum of \$1,200 per annum if they satisfy the requirements of the program, which, in turn, will be developed with the Joint Occupational Health and Safety Committee. This information will be part of the offer of employment to employees and annual updates will be provided to employees. As part of the program, monitoring and reporting will be developed collaboratively with the Joint Occupational Health and Safety Committee to ensure maximum value and understanding of how this program is benefitting the health of employees. Telkwa Mining 's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. This has been updated in the Revised Tenas Project Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-167	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 62	GBA+	Please revise the submission to: 1. Include a reporting requirement on how grievances are handled, responded to, and shared with Wet'suwet'en in the implementation of Grievance Redress Mechanism for workers and community members. 2. On p. 62, include more information about funding for engagement with stakeholder	Telkwa Mining acknowledges the comment. 1. Telkwa Mining will report annually on the results of the Grievance Redress Mechanism including number and type of grievances received, measures taken to resolve each issue, and their current status. The reports will be publicly available. This has been updated in the Revised Tenas Project Transition Order:

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				groups, including who is responsible for funding for engagement, the duration of it and other details, including reporting requirements and a communications plan.	Gender-Based Analysis Plus Report (Attachment OW-005-1). 2. Telkwa Mining will fund community engagement programs from the employee involved with the Project during the Construction, Operation, and Decommissioning and Reclamation phases of the Project (approximately 25 years). The community engagement program at a high-level will be part of the role profile for the Mine Manager, Indigenous Superintendent, and Environmental Coordinator. Twice a year, presentations will be held with various Indigenous Nations and stakeholders to provide project updates, gather feedback, and answer questions. The same information will be posted on the Project's website and will be part of the annual report to regulatory agencies. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. Furthermore, Telkwa Mining will maintain an open-door policy for any groups that wish to engage with the Project. This has been updated in the Revised Tenas Project Transition Order: Gender-Based Analysis Plus Report (Attachment OW-005-1). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-168	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), p. 63	GBA+	Please revise the submission to: 1. On p. 63, include attending a culturally-relevant GBA Plus and GBV training in the list of mine manager's responsibilities.	Telkwa Mining acknowledges the comment. The management plans will be updated during development of the Project to include relevant cultural, GBA Plus, and GBV training activities. Telkwa Mining's social commitments to mitigating potential effects on equity-deserving groups have been carried forward into the Tenas SEMP. Annual reporting on the social monitoring and commitments within the Tenas SEMP will become a condition in the Tenas Project Environmental Assessment Certificate. As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-169	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 3 Effects (GBA+), pp. 3-103	GBA+	Please revise the submission to include direct quotes from the interviews with service organizations where applicable.	Telkwa Mining acknowledges the comment. In keeping with ethical practice in social science research, efforts have been made to protect the confidentiality of interviewees, including the use of names. This is especially important in smaller communities, where individuals may be easily identifiable by their choice of words or the content of their statements. To respect this confidentiality, direct quotations have been deliberately avoided. In some cases, a pledge of confidentiality was an agreed condition of the interview (although it was not possible to guarantee it). Where interviewees are cited by first initial and surname in the document, Telkwa Mining has faithfully paraphrased their input based on detailed notes taken during the interview. Interviews were not recorded; therefore, direct quotes

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					are generally not available. Telkwa Mining is committed to working with OW to support appropriate information being made available to inform decisions by OW and BC on the Project and, if approved, the development of the Project. Telkwa Mining recognizes that as additional information is provided by OW, that information may inform conclusions on the project and proposed conditions, including management plans.
OW-170	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 4, p. 7	Fish, Wildlife, Caribou and People	Please revise the submission to: 1. Add Impact on Wet'suwet'en Traditional Subsistence Activities to the list of assessment of VC-specific effects on current and future generations. 2. The subsection Effects on other VCs under the section Fish and Fish Habitat should include the Effects on traditional fishing. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on	Telkwa Mining acknowledges the comment. Please refer to Attachment OW-170-1 for the Wet'suwet'en Rights and Interests Assessment. Telkwa Mining acknowledges that OW is still completing its RIA, CUS, Wellbeing studies, and related studies. Telkwa Mining is committed to ongoing engagement with OW to include appropriate information into Project development.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-171	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 12	Fish, Wildlife, Caribou and People	Please revise the submission to: 1. Add the section on Traditional Subsistence Activities of Local Indigenous people as a separate VC. 2. Discuss the project impacts on wildlife, fish habitat, caribou and water in the context of traditional subsistence activities, cultural practices, land use and food security. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-172	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, pp. 15-16	Fish, Wildlife, Caribou and People	Please revise the submission to include discussion on traditional subsistence activities of Wet'suwet'en in the subsection Social and Cultural Pillars of Sustainability on pp. 15-16. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining acknowledges the comment and, as requested by the OW, Telkwa Mining will discuss appropriate incorporation of the results of the RIA, CUS, and Wellbeing Study into Project design, monitoring, mitigation, and adaptive management plans.
OW-173	NEW	2025 03 04 LTR - TML - Transition order Schedule A	Fish, Wildlife, Caribou and People	Please revise the submission to: 1. Clarify how valued components were determined and if they will be refined based on the input of Indigenous	Telkwa Mining acknowledges the comment. The Project's Valued Components were determined based on documented engagement with both regulatory agencies and Indigenous

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		section C point 4 - Effects, p. 4		Knowledge holders. 2. Add "safety and security for Indigenous women, girls and gender-diverse people" to Human VCs. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Nations during the Pre-Application phase for the Tenas Project. Tenas Project Valued Components are open to refinements and/or additions based on further input from Indigenous Knowledge Holders during development of the Project.. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-174	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 10	Fish, Wildlife, Caribou and People	Please revise the submission to: 1. Add the potential change in access and use of the water sources and Wet'suwet'en peoples' ability to exercise their right to use these water sources to the list of Residual Adverse Effects. 2. Consider the potential change in access and use of the water sources and Wet'suwet'en peoples' ability to	Telkwa Mining acknowledges the comment and, as requested by OW, Telkwa Mining will discuss appropriate incorporation of the results of the Wet'suwet'en RIA, CUS, and Wet'suwet'en Well-being Study into Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				exercise their right to use these water sources for each VC. 3. Assess the significance of this residual adverse effect for each stage of the project. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-175	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 14	Fish, Wildlife, Caribou and People	Please revise the submission to: 1. Clarify which Project Mitigation Measures and Management Plans include monitoring as a component. 2. The information about a monitoring component in Project Mitigation Measures and Management Plans should also include the information about the	Telkwa Mining acknowledges the comment. Almost all YMD-Enhanced Environmental Management Plans have a monitoring component. Mitigation measures added during the certificate development process will either be added to existing monitoring programs or have monitoring programs developed for them during the permitting phase of the Project. Telkwa Mining will report out to First Nations and the EAO on EA Certificate-

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				funding sources, the duration of funding and reporting mechanisms.	developed Environmental Management Plans throughout the life of the Project. Telkwa Mining will be responsible for funding these monitoring and reporting programs which are expected to continue through the Construction, Operation, Decommissioning and Reclamation and at least 50 years into the Post closure phase of the Project for a total of 75 years at a minimum. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-176	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 17	Fish, Wildlife, Caribou and People	Revise the statement about potential adverse socio-economic effects of labour forces for Indigenous communities, recognizing that the issue has not been fully explored. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on	Telkwa Mining acknowledges the comment and that the OW is still completing its RIA, CUS, Wellbeing Study, and other related studies. Telkwa Mining is committed to ongoing engagement with the OW to include appropriate information into Project development.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-177	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 22	Fish, Wildlife, Caribou and People 2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 22	Please revise the submission to: 1. On p. 22, consider publicly available regional growth strategies.	Telkwa Mining acknowledges the comment. The Revised Tenas Project Environmental Assessment Transition Order: Current and Future Generations Analysis Report includes publicly available regional growth strategies and plans that are relevant to LSA and RSA, such as Village of Telkwa Strategic Plan and Smithers Telkwa Rural Official Community Plan, Bylaw No. 1704, 2014, Schedule A (Attachment OW-005-2) . As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-178	NEW	2025 03 04 LTR - TML - Transition order Schedule A section C point 4 - Effects, p. 24	Fish, Wildlife, Caribou and People	Please revise the submission to include the promotion of Indigenous peoples, women, and gender-diverse people to senior or management level positions.	Telkwa Mining acknowledges the comment and, to support this objective, Telkwa Mining will work with OW and House Groups during development of the Project to have training and processes in place to expand employment and career opportunities and identify pathways for promotion to senior or management level positions. These efforts will include specific initiatives to encourage Indigenous Peoples, women, and gender diverse people to develop their skills and training so they may obtain the necessary qualifications and build experience to enable them to succeed in mid- and senior- or management-level positions. This

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
					has been updated in the Revised Tenas Project Environmental Assessment Transition Order: Current and Future Generations Analysis Report (Attachment OW-005-2). As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-179	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 22	Indigenous labour market	Please develop a better understanding of local employment effects that involve Indigenous people to address the gaps noted in this comment. Please ensure any referenced or additional material addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led	Telkwa Mining acknowledges the comment and that the OW is still completing its RIA, CUS, Wellbeing Study, and other related studies. Telkwa Mining is committed to ongoing engagement with the OW to include appropriate information into Project development. As requested by OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-180	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 24	Indigenous economic development	Please develop a better understanding of Wet'suwet'en Nation entrepreneurship and business conditions and development. Please ensure any referenced or additional material addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining acknowledges the comment. Telkwa Mining has identified the following contract opportunities that Wet'suwet'en people could participate in, based on the feasibility study, which have significant values while not being equipment or equipment parts-related: -Road Construction, estimated at \$9.26 million. -Topsoil Salvage, estimated at \$12.47 million. -Processed Coal Haul, estimated at \$66.4 million. -Processed coal stockpiling and loading, estimated at \$16.75 million. -Water management infrastructure, estimated at \$18.5 million. -Seed collection for reclamation. -Environmental and geotechnical monitoring. -Security. -Employee transportation. -Planting via drone seeding and manual planting of seedlings. -Nursery development. -Reclamation Activities; and -Coal, water, and rock laboratory support. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
OW-181	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 25	In-migration, regional demographics, economic impacts, housing impacts	Please provide information on the types of demographic effects from an influx of non-local construction and mine workers (e.g., inflation, housing). Please ensure any referenced or additional material addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining acknowledges the comment. Telkwa Mining has committed to housing the construction workforce in hotels, private residences, and campgrounds within the region, from Houston through to Hazelton, so this should not have an inflationary pressure on the local housing stock. Given the size of the construction workforce compared to the main population centres, it is highly unlikely that there will be an increase in consumer goods in the region. Telkwa Mining has also committed to temporarily housing new employees for a period of 1 to 6 months in hotels to provide adequate time to find housing in one of the three villages or the overall Bulkley Valley to commute to the Project. Finally, Telkwa Mining has committed to providing transportation to the Project from Hazelton, Witset, Smithers, and Houston with the goal of spreading the requirement of any new employees in the region over a number of communities. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-182	NEW	2025 03 03 LTR - TML - Transition order Schedule A	Infrastructure and services	Please develop a better understanding of the flows and barriers of tax revenues from regional, provincial, and federal governments to	Telkwa Mining acknowledges the comment. There are several publicly available revenue-sharing agreements between Indigenous Nations and the BC provincial government related to

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		section C points 1, 2 and 5, p. 26		Wet'suwet'en people. Please ensure any referenced or additional material addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	mineral taxes ranging from a low of 15% to a high of 35%. Telkwa Mining will advocate for a 65/35 split between the provincial government and Indigenous Nations in relation to mineral tax revenue sharing for this Project. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-183	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 27	Land and Resource Use	Please provide an analysis around the land and resource use plans of the Wet'suwet'en (e.g., territorial land and resource plans). The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and	Telkwa Mining acknowledges the comment. Telkwa Mining has requested OW to provide land and resource plans of the Wet'suwet'en for their lands where the Project is located to collaboratively incorporate this into the overall planning for the Project. Unfortunately, after several years of engagement, these are yet to be provided to Telkwa Mining. Telkwa Mining is willing to work with the OW once these plans are provided to complete

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	analysis related to this topic during Project development. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.
OW-184	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 29	Employment effects	Commit to further mitigations development that are encompassing of the broader Wet'suwet'en Nation- Consider expanding skills and employment development that is indirectly or unrelated to the Project (e.g., Wet'suwet'en administrative capacity). The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the	Telkwa Mining acknowledges the comment. The Tenas Project has many entry-level positions requiring base mine training and induction activities, which can be carried out by Telkwa Mining once people are hired. Telkwa Mining is confident that roughly 15 Wet'suwet'en members can be found to fulfill these positions given its commitment to providing transportation from local communities and not requiring a valid Class 5 driver's licence or a Grade 12 diploma as prerequisites for these positions. As requested by the OW, Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs Project design, monitoring, mitigation, and adaptive management plans.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-185	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 36	Economic development	Commit to further mitigations development that addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully	Telkwa Mining acknowledges the comment from the OW. Telkwa Mining will consider any forthcoming information from the OW and the Houses and, as appropriate, will consider how this information informs the ongoing mitigation and monitoring planning for the Project.

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
				considered by the EAO in its assessment report and recommendations to the minister on these matters.	
OW-186	NEW	2025 03 03 LTR - TML - Transition order Schedule A section C points 1, 2 and 5, p. 57	Land and Resource Use	Please develop a better understanding of Office of Wet'suwet'en plans for lands extending across the Territory. Please ensure any referenced or additional material addresses the gaps noted in this comment. The Office of the Wet'suwet'en (OW) notes that further information on this topic may be provided in the forthcoming Wet'suwet'en assessment and related studies (i.e., the Rights Impact Assessment, Wet'suwet'en Well-being Study, and Cultural Use Study). This does not negate the importance of the information provided by OW in this comment or the information requested by OW herein, which TML must provide. However, absent the forthcoming Wet'suwet'en-led assessment material, OW cannot consider TML's assessment of these matters to fully or accurately reflect Wet'suwet'en perspectives on potential Project impacts and mitigation measures. Once provided, OW expects the Wet'suwet'en-led assessment material to be meaningfully considered by the EAO in its assessment report and recommendations to the minister on these matters.	Telkwa Mining acknowledges the comment and that the OW is still completing its RIA, CUS, Wellbeing Study, and other related studies. As Project development and planning progresses, Telkwa Mining is committed to ongoing engagement with the OW to include appropriate information.
OW-187	NEW	Accidents, Malfunctions,	Accidents and Malfunctions	In regard to environmental effects on the Project, TML must consider and address	Telkwa Mining acknowledges the comment. Impacts to Indigenous VCs resulting from Project impact pathways is

OW Comment ID	Master ITT Comment ID (BC EAO)	Original Document Source and Section	Topic and IR Content Request	OW Recommendations from Letters/Reports	Telkwa Mining Response to OW Comments
		And Effects of The Environment On The Project Section 9.0 Accidents and Malfunctions Section 10 Effects of the Environment on the Project.		impacts to Indigenous VCs resulting from Project impact pathways including but not limited to: • Slope stability concerns and subsequent erosion and sedimentation; • Water withdrawal from fish-bearing streams during low precipitation; and • Wildfires.	represented and explained in each VC chapter of the EAC Application. With respect to accidents and malfunctions, the reasonable worst-case scenarios identified analyzes impacts related to the specific unplanned event from an accident and malfunction. As such, slope stability related to failure of management ponds (Section 5.1), sediment releases to water (Section 5.6) and earthworks failures (Section 5.9) all address VC impacts (Attachment OW-020-2). Water withdrawal from fish-bearing streams during low precipitation is not considered an impact as a result of the identified potential accidents and malfunctions. Impacts to fish-bearing streams would be found in Chapter 3 Surface Water VC (Attachment OW 187-1). Wildfire impacts as a result of a fire or explosion is not anticipated however, mitigation measures are provided to minimize any risk of fires spreading in Section 5.11 (Attachment OW-020-2). Wildfires are addressed in the Mine Emergency Response Plan (Attachment OW-008-1). The VC receptors are the same as considered in the EAC Application. Section 2.4.1 Selection of VCs identifies Indigenous groups as a candidate VC (Attachment OW-187-2). Indigenous VCs are woven into each listed VC impact in the accident and malfunction and considered where potential unplanned events from accidents and malfunctions can occur and when interactions between these events and receptor VCs may have significant and severe effects.

Enclosure 4

NORTHERN HEALTH COMMENTS AND RESPONSES BASED ON TELKWA MINING'S RESPONSE TO TRANSITION ORDER SCHEDULE A SECTION C ITEMS 1, 2, 3, 4, 5, AND 6

Table 1: Responses to 8 September 2025 Northern Health Comments on Section 25 Transition Orders

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
1	2-Sep-25	Item 6 - The Project's greenhouse gas emissions	General	Northern Health (NH) appreciates the opportunity to provide input on the Tenas Coal EA — GHG Emissions Update for the proposed Project. We note the Project's estimated emissions — 30,939 tCO₂e annually, or 680,652 tCO₂e over the life of mine — while below regulatory thresholds, contribute to cumulative climate impacts that affect population health and the resilience of our health system. As the regional health authority serving approximately 300,000 residents across a vast geography of northern British Columbia, NH is uniquely positioned to observe and respond to the health impacts of climate change. We are committed to build[ing] a climate-resilient health system (https://www.northernhealth.ca/sites/northern_health/files/about-us/reports/strategic-service-plans/documents/northern-health-strategic-plan-2023-2025.pdf) in response to the growing health effects of climate change. NH is increasingly required to divert resources to prepare for and respond to climate-related health effects already being experienced in our region, including deteriorating air quality from wildfires, extreme heat events, flooding, and infrastructure disruptions. These risks are projected to intensify in Northern BC, placing additional strain on health services and exacerbating both acute and chronic disease burdens. Our comments reflect Northern Health's progressing and expanding work in Climate Change and Health Vulnerability and Adaptation Assessment because of mandates and a growing body of compelling evidence supporting climate and health action. We recommend the proponent (based on provincial strategies, regional reports, and emerging evidence): • Ensure alignment with provincial strategies such as the BC Climate Preparedness and Adaptation Strategy (https://www2.gov.bc.ca/assets/gov/environment/climate-change/adaptation/cpas.pdf) and the BC Ministry of Health's Risk to Resilience Report (https://climateredycbc.gov.bc.ca/pages/health). The latter emphasizes that climate change imposes significant and escalating impacts on B.C.'s communities and health system, now and into the future. There are lost lives and livelihoods, displacement, disrupted communities, and strained health services left in the wake of recent extreme heat waves, wildfires, floods, droughts, and other climate-related events. These events have also impacted supply chains, limiting access to essential supplies, health care, and medications. Delaying action comes at a high cost, as B.C.'s health system and communities will be increasingly challenged to respond to overlapping emergencies and maintain essential health functions. • Consider integrating hazard, risk and vulnerability assessments, such as from the Regional District of Bulkley-Nechako (Electoral Area A - Smithers/Telkwa Rural) (https://www.rdbn.bc.ca/application/files/7916/8609/1664/Final_HRVA_Report_EA_A-20230526SONilPEM.pdf) into planning, construction, operations and decommissioning phases to ensure long-term resilience. • While the proponent has considered the Project's potential positive or negative effects on carbon sinks, including forests, we encourage further evaluation in light of emerging evidence. A recent article by the World Resources Institute (https://www.wri.org/insights/global-trends-forest-fires?apcid=0065d91741a9a798ef87ad03&utm_campaign=wridigest&utm_medium=email&utm_source=wridigest-2025-08-26) highlights that forest fires are now a leading driver of global tree cover loss, with boreal regions—such as those in Northern BC—experiencing record-breaking fire seasons. These fires not only degrade air quality and threaten infrastructure but also compromise the carbon storage capacity of forests, potentially turning them from carbon sinks into net sources of emissions. This fire-climate feedback loop poses significant risks to both ecological and human health systems. Additional Context (from Health Canada, 2022): • Research shows that the health of Canadians has been affected by climate variability and change in recent years — both directly, when extreme heat and other natural hazards result from climate change, and indirectly, through a range of social, environmental, cultural, and economic pathways that have effects on health. • All Canadians can be affected by climate change; however, the distribution of these impacts and related health risks are not uniform. Seniors, children, racialized populations, low-income individuals, individuals with chronic health conditions, and First Nations, Inuit, and Métis peoples often experience greater health impacts of climate change.	The Tenas Coal Metallurgical project (the Project) acknowledges that collaboration with Northern Health for a climate-resilient health system an important priority. Global greenhouse gas emissions contribute to climate change and affect population health and the resilience of health systems. The Project will contribute to global greenhouse emissions; however, the potential exists to improve the resiliency of the Project through thoughtful climate change adaptation. The Project will complete a Hazard, Risk, & Vulnerability Assessment (HVRA) for the Project prior to construction. The assessment will be developed in alignment with the Emergency Management BC process to develop a HRVA and modified for application to a mine project in the permitting or design stage of development.¹ The HVRA will: • Align with provincial strategies such as the BC Climate Preparedness and Adaptation Strategy • Include localized climate data for the mine site • Identify and prioritize hazards with the co-production of knowledge • Identify potential risk reduction strategies The HRVA will inform the Tenas Mine Emergency Response Plan which will integrate climate-related risks with a disaster risk reduction perspective and The Tenas GHG Monitoring, Mitigation, and Climate Change Management Plan where the HRVA in accordance with recommended best practice will be reviewed every 5 years. The Project has a commitment to mitigate GHG emissions occurring from the Project and will develop adaptation measures for the Project that include connecting adaptation to health benefits or “co-benefits” for the Project and community because of mitigation and adaptation efforts.

¹ The current online tool is designed and available for use by Indigenous communities and Local Authority representatives.

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
				Measures taken in many sectors to mitigate climate change (by reducing GHGs or sequestering carbon) or to adapt to climate change can also have very large benefits for health — immediately or in the long term. These “co-benefits” of climate change mitigation and adaptation add to the value of action taken and can avoid poor health outcomes and economic costs to health systems and society [10.6]. Economic savings from such actions can also help to offset the costs to society of reducing GHGs. (https://changingclimate.ca/health-in-a-changing-climate/chapter/10-0/) Berry, P., & Schnitter, R. (Eds.). (2022). Health of Canadians in a Changing Climate: Advancing our Knowledge for Action. Ottawa, ON: Government of Canada. Government of Canada Publications (https://publications.gc.ca/collections/collection_2022/sc-hc/H129-121-2022-eng.pdf)	
2	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	1. Introduction	It says the mine life will be approximately 25 years. Due to the recent change in project ownership, could TML please provide a detailed timeline (including start and end dates) for both the construction and operational phases of the project? We are particularly interested in understanding whether the project schedule may align with other foreseeable developments that could potentially compete for workforce, accommodations, and community infrastructure and services. For example, the North Coast Transmission Line Phase 2—which passes through Telkwa—is currently anticipated to be operational by mid-2031.	The current Project timeline is: - Enter Effects Assessment in Q4, 2025 - Certificate Decision Q2, 2026 - Permit Applications Lodged End of 2026 - Permits Granted Q4 2027 - Construction starts in 2028 - First Coal in late 2028 While there are other Projects planned, these are committed to using dedicated work camps and should not affect the availability of hotels. Telkwa Mining is in contact with BC Hydro to mitigate potential overlaps if possible. This assessment was part of the EAC Application.
3	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	3.1.1.1 Potential Effects	The first sentence in the opening paragraph presents a series of predicted job figures. Could you please revisit the figures? It appears the calculation for construction phase was based on the "Employment (jobs)" column in Table 5.2-1. However, since the paragraph refers to full-time equivalents (FTEs), we should instead use the "Employment (FTEs)" column for accuracy. Using the FTE data, the revised figures would be: Direct: 160.0 + 135.8 = 295.8 FTEs Indirect: 25.1 + 129.1 + 75.9 = 230.1 FTEs Induced: 18.2 + 56.5 + 55.1 = 129.8 FTEs Additionally, the figures for the operations phase appear to have been derived from Table 5.2-2 (Jobs). To maintain consistency, the calculations should instead reference Table 5.2-3 (FTEs).	Telkwa Mining agrees with these changes, the error has been acknowledged and addressed in the revised Environmental Assessment Transition Order Supplemental Report (Version 3.0; Appendix 2).
4	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	3.3.1.1 Potential Effects	Thank you for highlighting the uncertainty in budget allocation. Northern Health facilities located near the project may not necessarily benefit from increased revenue and could, in fact, be negatively impacted—particularly if the workforce’s non-occupational, non-urgent health care needs are not well-managed. These needs typically represent approximately 80–90% of total health care demand, with the remaining 10–20% being occupational and urgent, based on monitoring data from other EA projects. Therefore, I respectfully disagree with the conclusion that a positive effect is predicted. Community infrastructure and services encompass a broad and diverse range of components. It would be overly simplistic to characterize the overall impact as uniformly positive. At a minimum, the conclusion should acknowledge the potentially disproportionate distribution of effects across different sectors and regions.	Please refer to the BC EAO EAC Application, Section 6.0 Social Effects Assessment, Chapter 3 (Infrastructure and Services Valued Component)² for the assessment of adverse effects on community infrastructure. In accordance with the requirements of the Transition Order (BC EAO 2022)³, the revised Environmental Assessment Transition Order Supplemental Report (Version 3.0; Appendix 2, Section 3.1.1.1) identifies new positive effects.
5	4-Sep-25	Items 1, 2, 5 - Positive	3.3.1.2 Mitigation Measures	Northern Health has consistently raised concerns that the existing conditions described for health services do not adequately reflect the capacity challenges in the region, and that the residual effects on health services	Telkwa Mining is committed to implementing the HMSP developed by TCL. The HMSP is a living document that is reviewed every two years and will

² TCL. 2022a. BC EAO Application for the Tenas Project – Section 6.0 Social Effects Assessment Chapter 3 Infrastructure and Service Valued Component. May 2022. Retrieved at: https://projects.eao.gov.bc.ca/api/public/document/627c1f340df8410022b077f3/download/06.3_InfraServ_May2022-.pdf

³ BC EAO. 2022. Transition Order under Section 78(7). December 2022. Retrieved at: https://projects.eao.gov.bc.ca/api/public/document/639ce258f66bcd00222e8f1e/download/Tenas_Transition_Order_Dec%2016%2C%202022_FINAL.pdf

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
		Effects to Indigenous, Indirect Effects, Land Use Plans		have not been accurately assessed or described. In response to these concerns, the previous project proponent, Telkwa Coal Ltd. (TCL), made a series of commitments regarding the Health and Medical Services Plan (HMSP) to mitigate residual effects (see NH-22 in the Master Issues Tracking Table). TCL also expedited the drafting of an HMSP for Northern Health’s review. Given the change in ownership, it is critical that the new proponent, TML, is made aware of the HMSP-related commitments and the draft HMSP prepared by TCL. Lastly, it is important to note that health system capacity is not static—it has been fluctuating and, in some areas, deteriorating. The assessment conducted in 2022 does not necessarily reflect the current situation, nor does it account for the anticipated conditions when the project enters the construction phase.	be reviewed during the permitting process and upon the decision to construct the Project to ensure it reflects the current situation of the health system in the region. This will include engagement with NH to ensure their feedback is incorporated.
6	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	3.3.2.2 Additional Mitigation Measures	Could you please clearly identify the present and foreseeable projects? It is not reasonable to assume that these projects would have similar enhancement measures in place without understanding their presence, scope of capital investment, workforce size, and specific mitigation strategies. For example, we are currently aware of two foreseeable projects: 1. The North Coast Transmission Line, which passes through Telkwa and may include a camp near the community. 2. The Prince Rupert Gas Transmission project near Houston, for which camp locations have not yet been shared with us. Both projects are expected to have some level of impact on community infrastructure and services, including health and medical services. Therefore, further research is needed to better understand these projects and to provide a more accurate estimate of their cumulative effects.	The list of past, present, and reasonably foreseeable future projects are found on Page 34 of the Application Information requirements (BC EAO 2022⁴) and Section 5.0, Chapter 1, Table 6-1 in the EAC Application (TCL 2022b⁵). Telkwa Mining will revisit mitigation measures during the permitting process, once there is a clearer understanding of the intended camp setups and construction timelines for these two Projects, which were not foreseeable in 2020.
7	4-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, Indirect Effects, Land Use Plans	Table 2: Response to 15 May 2025 to Office of the Wet’suwet’en Comments on Section 25 Transition Orders	Regarding TML’s response to OW-181: While Northern Health has consistently advocated for closed camps for EA projects to the greatest extent possible, we understand that both TCL and TML may prefer to house workers within communities. Given your commitment to providing transportation from various towns, it is important to highlight the risks associated with shuttle bus services, particularly in relation to accidents and malfunctions. Emergency preparedness and response planning must explicitly account for potential shuttle bus incidents. To illustrate the importance of this issue and clarify Northern Health’s expectations for project proponents, we refer you to a letter from Northern Health addressed to Coastal GasLink regarding the June 2023 bus incident. This letter is included in Appendix E of SEEMP Status Report No. 11, available at: https://www.coastalgaslink.com/siteassets/pdfs/about/regulatory/cgl-seemp-status-report-no-11.pdf	Telkwa Mining will add this aspect to accidents and malfunctions during the permitting process. The MERP will also be updated to include improvements from NH that were provided in their letter on the bus incident.
8	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	3.4.3 Mental Health	The discussion focused on women employed by the project. However, what about women who are not directly employed, but whose partners work shift jobs at the project?	Section 3.4.3 Mental Health of the Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Appendix 1) has been updated to include a discussion around the potential mental health effects of the Project on women whose partners work shift jobs at the Project with the following text: <i>“The mental health effects of working conditions in resource projects may extend beyond workers to affect their partners and children, particularly women (Manning et al., 2018; J. Shandro, 2014). Women whose partners are employed in resource projects are more vulnerable to emotional distress associated with prolonged partner absences from long shift rotations. The responsibility of managing childcare and housework during these periods can contribute to increased stress levels and social isolation.”</i> Telkwa Mining is committed to implementing an Employee and Family Assistance Program to address mental health effects on workers' partners, including women, and their children (see Table 8 in the report).

⁴ BC EAO. 2022. Application Information Requirements – Tenas Project. January 2022. Retrieved from: https://projects.eao.gov.bc.ca/api/public/document/61eb407fd72e0e0022f2693f/download/Tenas%20Application%20Information%20Requirements_FINAL.pdf

⁵ TCL. 2022b. BC EAO Application for the Tenas Project – Section 5.0 Social Effects Assessment Chapter 1 Labour Market Valued Component. May 2022. Retrieved at: https://projects.eao.gov.bc.ca/api/public/document/627c1e960df8410022b077b0/download/05.1_LabMark_May2022-.pdf

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
9	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	The revised intersectional mitigation under the theme of "employment and income, mental health" mentions the development of support groups. Could you clarify what these groups are? Are you referring to the ones listed in Table 1?	Telkwa Mining will develop support groups at the mine for the equity-deserving populations such as Indigenous persons, women, and 2SLGBTQI+ to provide a safe space to discuss concerns and provide input to Telkwa Mining, particularly regarding strategies to reduce barriers or other issues related to employment and training. Telkwa Mining will involve community service providers such as those identified in Table 1 of the Tenas Project Environmental Assessment Transition Order: Gender-Based Analysis Plus Report (Appendix 1) when developing these support groups. The support groups will likely meet on a quarterly basis in Telkwa or alternative convenient location.
10	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	The key mitigation measures under the theme of "housing, mental health" mention a phased ramp-up of the workforce. Northern Health would like to share our experience from other EA projects, where we observed significant deviations between the forecasted and actual non-local/regional workforce sizes, as well as the timing of employee ramp-up and peak periods. In several cases, project proponents housed workers outside of designated camps (e.g., in hotels, motels, or trailers) or amended their Environmental Assessment Certificate (EAC) to increase camp capacity. Although the Tenas Project does not include a worker camp, it could face similar challenges in securing appropriate housing for workers if actual conditions differ from forecasts. It is therefore critical for TML to closely monitor workforce trends and respond proactively to avoid adverse outcomes.	Telkwa Mining agrees with this comment. The Project's Socio-Economic Management Program (SEMP) includes a monitoring program that will proactively track trends in workforce demographics and location. This information will enable Telkwa Mining to implement additional follow-up mitigations and address potential challenges in securing housing for workers (Table 6.2-14 in the SEMP).
11	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Regarding key mitigation measures of "construction workforce accommodation": Please be mindful of other projects currently underway or planned in the area and avoid creating impacts on the normal housing needs of local/regional residents and tourists, while still supporting opportunities to increase revenue for local businesses.	Telkwa Mining agrees with this comment and is contact with the two projects currently in the planning stage with the goal of determining appropriate mitigations and coordination of engagement with local communities to reduce impacts from the cumulative effect of the projects.
12	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	The revised intersectional mitigation under the theme of "food security" mentions a breakfast program at schools. Thank you for offering support and funding. If TML or the school requires assistance with the details of implementing a breakfast program, Northern Health has resources available, including dedicated webpages and population health dietitians who can support planning and delivery. More information is available at: https://www.northernhealth.ca/health-information/healthy-eating-school	Telkwa Mining appreciates the information and looks forward to collaborating with Northern Health in the delivery of these important programs.
13	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Some EA mining projects in the North—such as Blackwater Gold—have implemented similar initiatives, and it may be beneficial for TML to connect with them to learn more about program delivery and outcomes before allocating resources. While the intent of this initiative is commendable, it is important to ensure that regular review of outcomes are built into the process to inform updates or revision to the program as needed.	Telkwa Mining agrees with this statement and will connect with Blackwater Gold on this topic. Telkwa Mining will add a component to the SEMP related to the provision of support and funding for breakfast programs at Telkwa Elementary and/or Witset School during the Operation phase. The SEMP will include a monitoring program to track and review outcomes and mechanisms to adapt the program to changing conditions as needed. The program is contingent on securing government and/or non-government partners to assist with 50% of program delivery.
14	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Regarding key mitigation measures under the theme of "employment and income, childcare": Northern Health would like to remind TML that the commitment to fund two full-time positions at approved childcare facilities was made at least three years ago. It is critical to ensure that, when construction or operations begin, this need still exists within the community. Once this prescriptive commitment is recorded as an Environmental Assessment Certificate (EAC) condition, it may become cumbersome to alter—particularly if the need for daycare staff no longer exists or proves difficult to fulfill. Northern Health does not object to this well-intended commitment but would like to kindly remind TML of the importance of maintaining flexibility.	Telkwa Mining appreciates the input from Northern Health and agrees that EAC conditions should maintain flexibility.

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to Northern Health (NH) Comments
15	4-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 8: Intersectional mitigation measures	Please describe the Tenas Mine Advisory Committee, including the criteria for becoming a member, its purpose, scope, and meeting frequency.	Telkwa Mining will engage with the local community(ies) and Indigenous Nations during the permitting phase to confirm the makeup and terms of reference of the committee. Currently, Telkwa Mining envisions the Tenas Mine Advisory Committee (TMAC) to comprise approximately 13 members including Indigenous Nations (i.e., Office of the Wet'suwet'en, Wet'suwet'en First Nation, Witset First Nation, Kwen Bea Yex House, Cas'Yex House), town councils and local citizen groups (i.e., Smithers Town Council, Telkwa Town Council, What Matters in Our Valley, Houston Town Council), Regional District of Bulkley Nechako, Bulkley Valley Community Resources Board, and Telkwa Mining (Telkwa Mining Senior Leadership Team Member). Telkwa Mining is happy to include Northern Health in the TMAC upon request. To join the TMAC one must be an active member of one of the groups identified above. Members will serve for a term of three to five years and can serve multiple terms. The purpose of the TMAC is to provide independent, high-level oversight of mine related activities and an alternative channel for the public to express concerns and/or comment on mine activities and effects. The scope of the TMAC includes: • providing information on key aspects of the operation that overlaps with community (i.e., Indigenous, safety, socio-economic, and community, human resources, environmental, tourism, and other business • review of complaints and other feedback identified or designated as high priority; • review of safety and/or environmental incidents or issues identified or designated as high priority; • participation in tour(s) of the operation; • providing a forum or mechanism for Indigenous groups and the public to provide feedback; • guidance and advice on appropriate response(s) to received input from Indigenous groups and the public; • notifications to Indigenous groups and the public on any substantive changes in project activities during construction and/or operation; and • providing feedback and advice to the Collaborative Governance Steering Committee. The TMAC will meet at minimum twice per year.
16	8-Sep-25	Item 3 - Disproportionate Effects on Distinct Human Populations	Table 9: Intersectional monitoring, management, and evaluation measures - SEMP	This table outlines numerous monitored indicators included in the SEMP. NH would like to remind TML that the draft HMSP, developed by the previous project proponent (TCL), also contained a substantial number of monitored indicators. To ensure we're aligned on what has already been agreed upon, I will share the most recent draft HMSP currently available.	Telkwa Mining is committed to implementing the HMSP as developed by TCL and looks forward to working with NH to confirm alignment on the previously agreed to monitoring indicators.

Enclosure 4

FOSSIL MANAGEMENT BRANCH COMMENTS AND RESPONSES BASED ON TELKWA MINING'S RESPONSE TO TRANSITION ORDER SCHEDULE A SECTION C ITEMS 1, 2, 3, 4, AND 5

Table 1: Responses to 5 September 2025 FMO’s Comments on Section 25 Transition Order

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to NH Comments
1	5-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, indirect effects, land use plans	Environmental Assessment Supplemental Response, Executive Summary, ii-iii	Add "Fossil Resources" to the list of valued components, or specify "Heritage Resources (Including Fossils)"	Telkwa Mining acknowledges FMO’s feedback. The Supplemental Report has retained the valued components as established by the Environmental Assessment Office (EAO) in the Application Information Requirements (BC EAO 2022 ¹). As per previous commitments, Telkwa Mining remains committed to addressing fossil resources through a Fossil Impact Assessment (FIA) during the permitting phase.
2	5-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, indirect effects, land use plans	Environmental Assessment Supplemental Response, Table 2.2-2, Page 2-11	The Heritage Resources section of this table states "in consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Heritage Resources VC." In 2021 the BCFMO required the proponent conduct a Fossil Impact Assessment prior to construction beginning. On Sept 8 2025 the Fossil Management Office heard from the proponent that they had not yet conducted the FIA. We received a letter from the proponent committing to conducting FIA. Suggest including the following in this section: ""mitigation measures to avoid or reduce potential adverse effects on fossil resources include conducting a Fossil Impact Assessment (FIA), to be conducted by proponent's consultant prior to construction beginning"	Telkwa Mining will complete a FIA as part of the permitting phase of the Project.

Notes:

BC = British Columbia; BCFMO = BC Fossil Management Office; FIA = Fossil Impact Assessment; Project = Tenas Metallurgical Coal Project; Telkwa Mining = Telkwa Mining Limited; VC = Valued Component

¹ BC EAO. 2022. Application Information Requirements – Tenas Project. January 2022. Retrieved from: https://projects.eao.gov.bc.ca/api/public/document/61eb407fd72e0e0022f2693f/download/Tenas%20Application%20Information%20Requirements_FINAL.pdf

Enclosure 5

FOSSIL MANAGEMENT BRANCH COMMENTS AND RESPONSES BASED ON TELKWA MINING'S RESPONSE TO TRANSITION ORDER SCHEDULE A SECTION C ITEMS 1, 2, 3, 4, 5, AND 6

Table 1: Responses to 5 September 2025 FMO’s Comments on Section 25 Transition Order

Comment Number	Date	Document Name	Section of the report	Comments	Telkwa Mining Responses to NH Comments
1	5-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, indirect effects, land use plans	Environmental Assessment Supplemental Response, Executive Summary, ii-iii	Add "Fossil Resources" to the list of valued components, or specify "Heritage Resources (Including Fossils)"	Telkwa Mining acknowledges FMO’s feedback. The Supplemental Report has retained the valued components as established by the Environmental Assessment Office (EAO) in the Application Information Requirements (BC EAO 2022¹). As per previous commitments, Telkwa Mining remains committed to addressing fossil resources through a Fossil Impact Assessment (FIA) during the permitting phase.
2	5-Sep-25	Items 1, 2, 5 - Positive Effects to Indigenous, indirect effects, land use plans	Environmental Assessment Supplemental Response, Table 2.2-2, Page 2-11	The Heritage Resources section of this table states "in consideration of the above, new potential effects are not predicted; further assessment is not warranted for the Heritage Resources VC." In 2021 the BCFMO required the proponent conduct a Fossil Impact Assessment prior to construction beginning. On Sept 8 2025 the Fossil Management Office heard from the proponent that they had not yet conducted the FIA. We received a letter from the proponent committing to conducting FIA. Suggest including the following in this section: ""mitigation measures to avoid or reduce potential adverse effects on fossil resources include conducting a Fossil Impact Assessment (FIA), to be conducted by proponent's consultant prior to construction beginning"	Telkwa Mining will complete a FIA as part of the permitting phase of the Project.

Notes:

BC = British Columbia; BCFMO = BC Fossil Management Office; FIA = Fossil Impact Assessment; Project = Tenas Metallurgical Coal Project; Telkwa Mining = Telkwa Mining Limited; VC = Valued Component

¹ BC EAO. 2022. Application Information Requirements – Tenas Project. January 2022. Retrieved from: https://projects.eao.gov.bc.ca/api/public/document/61eb407fd72e0e0022f2693f/download/Tenas%20Application%20Information%20Requirements_FINAL.pdf