

4. ASSESSMENT PROCESS

The Ajax Project (the Project) is subject to review under the British Columbia *Environmental Assessment Act* (BC EAA 2002). Federally, the Project will be reviewed as a comprehensive study under the former *Canadian Environmental Assessment Act* (CEAA 1992), under the transition provisions of the *Canadian Environmental Assessment Act, 2012* (CEAA 2012).

This chapter describes the environmental assessment (EA) process relevant to the Project as prescribed by federal and provincial legislation, and presents details on information distribution and consultation activities with Aboriginal groups, the general public, government agencies, and stakeholders.

4.1 BRITISH COLUMBIA *ENVIRONMENTAL ASSESSMENT ACT* REQUIREMENTS

The BC EAA (2002) requires that certain large-scale project proposals undergo an EA and obtain an EA Certificate before they can proceed. Under the BC EAA, projects requiring an EA Certificate must prepare an Application¹ that identifies and assesses any potential environmental, social, economic, health, and heritage effects that may result from the proposed project, and ways to mitigate adverse effects where possible. The BC EAA and accompanying regulations establish the framework for delivering EAs in BC. Within this framework, the scope, procedures, and methods of the assessment are tailored specifically to the circumstances of the proposed project. This approach allows each review to focus on relevant issues when determining whether or not a particular project should proceed (BC EAO 2003).

The decision to approve or reject a provincial EA for a mining project is made by the Minister of Energy and Mines and by the Minister of Environment (the Ministers). In making their ministerial referrals, the British Columbia Environmental Assessment Office (BC EAO) considers the information presented in the Application, along with any issues raised throughout the review process, to inform their conclusions regarding the potential for the project to result in significant adverse effects. If the project is allowed to proceed, an EA Certificate is issued under Section 17(3) of the BC EAA and is subject to compliance and reporting requirements. The Certificate describes the physical works of the project (Schedule A) and commitments the proponent must implement which are summarized in a Table of Conditions (Schedule B). The EA Certificate specifies a deadline by which the project must have substantially commenced and is generally at least three years and not more than five years after the issue date of the Certificate (the holder of the Certificate may apply to have the deadline extended once). Once the project has substantially started, the EA Certificate remains in effect for the life of the project unless suspended or cancelled. Proponents may apply to amend their EA Certificate as project circumstances change.

¹ Federally, this information is compiled into an Environmental Impact Statement (EIS). Under a joint EA process, the proponent will submit one document that meets the requirements of both governments, referred hereafter as the Application/EIS.

The BC EAA is supported by six regulations: the Reviewable Projects Regulation (BC Reg. 370/2002), the Prescribed Time Limits Regulation (BC Reg. 372/2002), the Public Consultation Policy Regulation (BC Reg. 373/2002), the Concurrent Approvals Regulation (BC Reg. 371/2002), the Environmental Assessment Fee Regulation (BC Reg. 50/2014) – which are all described below – and the Transition Regulation (BC Reg. 361/2006), which applies to projects proposed on or before December 2002 and therefore is not applicable to this Project.

4.1.1 Reviewable Projects Regulation (BC Reg. 370/2002)

Criteria for determining whether proposed projects and activities (like mining) are subject to the BC EAA are laid out in the Reviewable Projects Regulation (BC Reg. 370/2002). The order issued under Section 10(1)(c) of the BC EAA on February 25, 2011 states the Project is reviewable pursuant to Section 3(1) of the Reviewable Projects Regulation (BC Reg. 370/2002) since the proposed Project would have a production capacity greater than or equal to 75,000 tonnes per annum (tpa) of mineral ore. As specified in the Section 10 Order, the proposed Project cannot proceed without an assessment because the proposed Project may have the potential for significant adverse environmental, economic, social, heritage, and health effects.

4.1.2 Prescribed Time Limits Regulation (BC Reg. 372/2002)

The Prescribed Time Limits Regulation (BC Reg. 372/2002) establishes time limits at different stages of the assessment process. Section 2 prescribes a 30-day time limit for screening of the Application by the Executive Director while Section 3(a) establishes a 180-day period to review the Application. There is also a 45-day time limit for making a decision after the Application has been referred to the Ministers, under Section 4 of the regulation. This regulation also specifies time limits to provide information, and conditions around suspending time limits.

4.1.3 Public Consultation Policy Regulation (BC Reg. 373/2002)

The Public Consultation Policy Regulation (BC Reg. 373/2002) applies to reviewable projects under the BC EAA where a Section 10 Order has been issued. The regulation requires proponents to undertake a public consultation program, as well as provide a summary and evaluation of public consultation activities held during the pre-Application and Application stages of the assessment process. The regulation also outlines the obligations of the Proponent and the Executive Director in providing adequate time for public consultation and review in accordance with the Prescribed Time Limits Regulation (BC Reg. 372/2002), as well as the need for a public comment period of 30 to 75 days on the Application, as established by the Executive Director.

4.1.4 Concurrent Approval Regulation (BC Reg. 371/2002)

The Concurrent Approval Regulation (BC Reg. 371/2002) provides the mechanism for reviewable projects under the BC EAA to apply for concurrent review of an application for eligible provincial approvals needed to construct, operate, modify, dismantle, abandon, or otherwise undertake all or part of a reviewable project that is undergoing a provincial EA, in accordance with Section 23(1) of the BC EAA. The regulation enables the Executive Director to consider project permit approvals concurrently with the EA process, where they may be required under separate enactments.

KAM has initiated discussions with the BC MMPO regarding permitting of the Project and establishment of the MRC. Once the MRC is established it will confirm the list of permitting requirements and develop a schedule for the submission, review and issuance of permits. KAM intends to submit applications for provincial permits and federal approvals at any time during or after the EA review and will continue discussions with the MMPO to establish the MRC and an agreement outlining a permitting schedule.

4.1.5 Environmental Assessment Fee Regulation (BC Reg. 50/2014)

The Environmental Assessment Fee Regulation (BC Reg. 50/2014) came into force in April 2014 and requires project proponents and certificate holders to pay fees at specific times within the assessment of a project. The Executive Director or the minister, as applicable, may make an order requiring the payment of application fees and/or enforcement fees. Under Section 4(1)(a), the Proponent is required to pay \$112,500 if the proposed Project was subject to an order under section 11 or 14 of the BC EAA before this regulation came into effect.

4.1.6 Guidance Documents

The assessment process chapter of the Application/EIS has been prepared by following the provincial guidance documents listed below:

- *Environmental Assessment Office User Guide* (BC EAO 2011);
- *Application Information Requirements Template* (BC EAO 2013a);
- *Guide to Involving Proponents when Consulting First Nations in the Environmental Assessment Process* (BC EAO 2013b); and
- *Public Comment Policy* (BC EAO n.d.).

4.2 CANADIAN ENVIRONMENTAL ASSESSMENT ACT REQUIREMENTS

The Project is subject to the requirements of the former *Canadian Environmental Assessment Act* (CEAA; 1992). The EA process for the Project commenced in 2011 as a comprehensive study type of EA. On July 6, 2012, CEAA (1992) was repealed and replaced by the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) which focused the federal EA process on two types of EAs: standard or review panel. For Projects with an EA already underway when CEAA 2012 came into force, transition provisions were established. Section 125(1) of CEAA 2012 states that a comprehensive study commenced under the former Act is to be continued and completed as if the former Act had not been repealed, and therefore is subject to any regulations in force at that time.

The federal decision to approve or reject the EA for a major resource project is made by the Minister of the Environment. In making a ministerial referral, the Responsible Authority (RA) for the comprehensive study, the Canadian Environmental Assessment Agency (CEA Agency), considers the information presented in the Environmental Impact Statement (EIS) and the Comprehensive Study Report (CSR), along with any issues raised throughout the review process, to inform their conclusions regarding the potential for the project to result in significant adverse environmental effects. If the project is allowed to proceed, an EA Decision Statement is issued under Section 23(1) of CEAA (1992).

The EA Decision Statement states whether the project is likely to cause significant adverse environmental effects, and identifies the requirement for Responsible Authorities to implement any necessary mitigation measures or follow-up program that the Minister considers appropriate. Federal authorities are prohibited from taking a course of action decision (e.g., issuing an authorization) that could permit a project to be carried out in whole or in part unless the Decision Statement indicates the designated project is not likely to cause significant adverse environmental effects or, if significant adverse environmental effects are likely, that they are justified in the circumstances.

Federal regulations applicable to projects undergoing a comprehensive study that commenced prior to CEAA 2012 coming into force are described below.

4.2.1 Comprehensive Study List Regulations (SOR/94-638)

Based on a review of the Project Description, the CEA Agency determined that the Project, as described by the Proponent, is subject to a comprehensive study pursuant to Section 16(a) of the Comprehensive Study List Regulations (SOR/94-638) since the Project will involve the "...proposed construction, decommissioning, or abandonment of a metal mine, other than a gold mine, with an ore production capacity of 3,000 t/d or more."

4.2.2 Law List Regulations (SOR/94-636)

Pursuant to Section 5 of CEAA (1992) a federal EA is required if a federal authority contemplates exercising or performing a power, duty, or function with respect to a project. A federal EA is required for the Project since the following may occur:

- Fisheries and Oceans Canada may issue an authorization pursuant to subsection 35(2) of the *Fisheries Act* (1985b) for the carrying out of any work, undertaking or activity that results in serious harm to fish that are part of a commercial, recreational or Aboriginal fishery, or to fish that support such a fishery; and
- Natural Resources Canada may issue a licence under paragraph 7(1)(a) of the *Explosives Act* (1985a).

4.2.3 Establishing Timelines for Comprehensive Studies Regulations (SOR/2011-139)

Under the *Jobs and Economic Growth Act* (2010) amendments to CEAA (1992), two timelines were introduced for the federal EA process and prescribed in the Establishing Timelines for Comprehensive Studies Regulations (SOR/2011-139). This regulation requires the federal government to decide whether a comprehensive study is required within 90 calendar days of receiving a Project Description, and legislates 365 calendar days of government time to complete the EA process, from the Notice of Commencement (NoC) to the posting of the CSR for public comment. The NoC for the Project was posted on May 31, 2011. Since then 114 days of government time have elapsed with 251 days remaining.

4.2.4 Guidance Documents and Operational Policy Statements

This assessment process chapter has been prepared using the following federal guidance documents and policy statements. Some of these documents provide guidance for CEAA 2012 provisions; they are included here for general reference purposes:

- *Participant Funding Program – National Program Guidelines* (CEA Agency 2013a);
- *Practitioners Glossary for the Environmental Assessment of Designated Projects under the Canadian Environmental Assessment Act, 2012* (CEA Agency 2013b);
- *Considering Aboriginal Traditional Knowledge in Environmental Assessments Conducted under the Canadian Environmental Assessment Act – Interim Principles* (CEA Agency 2010); and
- *Public Participation Guide: A Guide for Meaningful Public Participation in Environmental Assessments under the Canadian Environmental Assessment Act* (CEA Agency 2008).

4.3 ENVIRONMENTAL ASSESSMENT PROCESS

4.3.1 Cooperative Environmental Assessment

This EA is conducted under the principles of the now expired bilateral *Canada–British Columbia Agreement for Environmental Assessment Cooperation* (the Agreement; Government of British Columbia and Government of Canada 2004). Under the Agreement, both the Government of Canada and the Government of British Columbia conduct a single, cooperative assessment, where possible, to meet the EA requirements of both levels of government while allowing for independent decision making on matters within their own legislative authority. The Agreement aligns key aspects of the EA process to minimize duplication and improve efficiency (e.g., conducting joint public comment periods, coordinating Aboriginal consultation, using common documents that meet the requirements of both governments, and establishing common working groups to facilitate the review process).

Subject to Section 12(1)(2) of the Agreement, where the proposed project is located on lands within provincial boundaries, the Government of British Columbia is the Lead Party for the EA process. Although the Agreement is now expired, both governments continue to coordinate EA processes in keeping with the principles of the Agreement.

In general, the provincial and federal EA processes include four main elements:

- provide opportunities to all interested parties, including Aboriginal groups, to identify issues and provide input;
- technical assessment of the potential environmental effects, and additional social, economic, heritage, and health effects of the proposed project;
- implementation of mitigation measures that avoid, minimize, control, or compensate for adverse effects, and that enhance beneficial outcomes; and
- consideration of issues and comments raised by interested parties when evaluating the significance of likely adverse effects, and when making recommendations about whether the project may proceed.

The provincial and the federal EA processes move through several steps:

- determination of whether an EA is required;
- establishing the Working Group that will be involved in the EA review process;
- preparation and planning for the Application/EIS by developing information requirements (e.g., drafting the Application Information Requirements [provincial] or EIS Guidelines document [federal]²);
- review and analysis of the Application/EIS;
- preparation of the Assessment (provincial) and Comprehensive Study (federal) reports; and
- referral to the appropriate provincial and federal ministers for a decision.

4.3.2 Joint Environmental Assessment Working Group

The BC EAO and the CEA Agency established the EA Working Group and began holding Project-related meetings on April 27, 2011. The purpose of the Working Group is to review and comment on key EA documents, including the AIR/EIS Guidelines, the Application/EIS, and the BC EAO and CEA Agency Assessment/CSR.

Typical membership of an EA Working Group includes representatives from all levels of government (federal, provincial, regional, and municipal), potentially affected Aboriginal groups, and other stakeholders as required. The members of the Ajax Project Working Group are identified in Table 4.3-1.

Table 4.3-1. Ajax Project Environmental Assessment Working Group Members

Type	Organization
Provincial agencies	BC EAO British Columbia Ministry of Forests, Lands and Natural Resource Operations (BC MFLNRO) British Columbia Ministry of Energy and Mines (BC MEM) British Columbia Ministry of Environment (BC MOE) British Columbia Ministry of Transportation and Infrastructure(BC MOTI) Interior Health Authority

(continued)

² Under a joint EA process, the proponent will submit one document that meets the requirements of both governments, referred hereafter to as the AIR/EIS Guidelines.

Table 4.3-1. Ajax Project Environmental Assessment Working Group Members (completed)

Type	Organization
Federal agencies	CEA Agency
	Department of Fisheries and Oceans Canada (DFO)
	Transport Canada (TC)
	Natural Resources Canada (NRCan)
	Environment Canada (EC)
	Health Canada, BC Region
Local/Regional government	City of Kamloops
	Thompson-Nicola Regional District
First Nations	Skeetschestn Indian Band (Stk'emlupsemc of the Secwépemc Nation)
	Tk'emlups Indian Band (Stk'emlupsemc of the Secwépemc Nation)
Working Group First Nations	Ashcroft Indian Band
	Lower Nicola Indian Band

4.4 PROVINCIAL ENVIRONMENTAL ASSESSMENT PROCESS

The provincial EA process is divided into three stages: the Pre-Application stage, the Application Review Stage, and the Decision. The stages and steps of the provincial EA process are shown in Figure 4.4-1. KAM initiated a number of pre-EA activities in an effort to prepare for the assessment process. This included conducting field and desk-based technical studies, and developing and implementing consultation and engagement programs with Aboriginal groups and the public.

4.4.1 Pre-Application Stage

4.4.1.1 Project Description

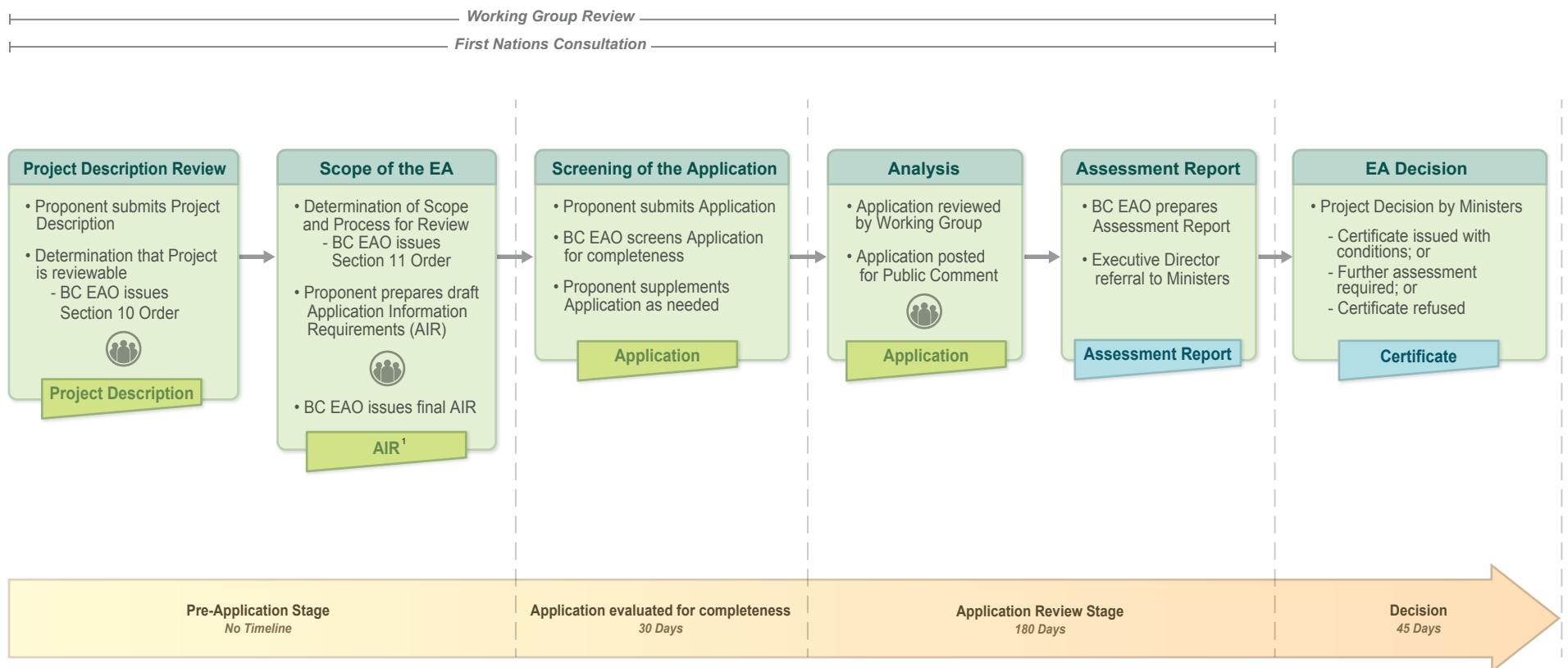
KAM entered the Pre-Application stage of the provincial process with the submission of a Project Description (PD) on December 6, 2010 to the EAO. A revised PD was submitted on February 8, 2011, to address comments from the EAO. After reviewing the revised PD, an Order under Section 10(1)(c) of the BC EAA (2002) was issued by the EAO on February 25, 2011 indicating the Ajax Project was reviewable. The Section 10 Order stated that the Project required an EA Certificate and that KAM may not proceed with the Project without an assessment.

An initial Working Group meeting was held on April 27, 2011, to present an overview of the Project, provincial and federal EA processes, and discuss field studies and preliminary issues. Based on early feedback, Aboriginal and Public concerns, and continuing refinements to the project design, namely engineering and economic issues, KAM submitted a revised version of the Project Description on May 17, 2011. On June 3, 2011 the BC EAO ordered (under section 11 of the EAA) that a first public comment period and open house be conducted in advance of the acceptance of the Proponent's final

Project Description³. The purpose of this initial 33 day public consultation, from June 8 to July 11, 2011, was to consult the public residing in communities in the vicinity of the Project on potential effects of the Proposed Project. The comments were compiled and addressed in an issues-tracking table; most of the issues related to air quality/dust and land and resource use. A final PD was submitted to the BC EAO on July 6, 2011.

³ Under Section 7 (1) of the Public Consultation Policy Regulation Public Consultation Policy Regulation, BC Reg. 373/2002., the Proponent must hold a minimum of one formal public comment period of between 30 to 75 days. Common practice is to hold a public comment period on the AIR/EIS Guidelines, and a second one on the Application/EIS; expectations on the timeline and duration of the public comment periods are outlined in the section 11 Order. In this case, the BC EAO deemed it necessary to issue a section 11 Order requiring a first public comment period on the Project Description. A second section 11 Order outlining the scope and procedures of the EA was issued on January 11, 2012.

Figure 4.4-1 Provincial Environmental Assessment Process



BC EAO: British Columbia Environmental Assessment Office
 AIR: Application Information Requirements
 EA: Environmental Assessment
 BC EAO Deliverable
 Proponent Deliverable
 Public Comment Period

Note: ¹ Preparation of the AIR is procedurally delegated to the proponent by the BC EAO.

4.4.1.2 *Application Information Requirements*

The AIR (formerly referred to as a Terms of Reference) identifies the information required to be submitted in the Application. In line with the federal-provincial coordination process, the provincial AIR document and the federal EIS Guidelines were prepared as one document for the Project and are referred to as the AIR/EIS Guidelines throughout this Application/EIS. The Proponent prepared a draft AIR (dAIR) for the Project, and submitted it to the BC EAO for review on April 18, 2011. The dAIR was then revised to address EAO's preliminary comments and submitted on June 15, 2011. The dAIR was then revised a second time and re-submitted on August 11, 2011 based on feedback received from the first public consultation period, which included adding valued components to the scope of the assessment. A third revision was made to the dAIR on January 6, 2012 to address Working Group comments and the dAIR was posted to the EAO's electronic Project Information Center (e-PIC) website on January 11, 2012 for public comments. A 75-day public comment period on the dAIR/EIS Guidelines ran from January 11 to March 27, 2012. Issues and concerns were tracked and responded to by KAM. A summary of the issues raised during the review of the dAIR/EIS Guidelines are provided in Section 4.7, Public and Government Agency Information Distribution and Consultation.

A final AIR incorporating comments received from the public, First Nations, Working Group, Community Advisory Group (CAG), federal, provincial and local government agencies was submitted to the BC EAO on June 13, 2013, and posted on the e-PIC website on June 25, 2013.

On November 10, 2014 due to Project design changes, a revised AIR was posted to e-PIC to reflect the new Ajax South General Arrangement, which presents the optimized Project design intended to address concerns raised in earlier consultation processes. Key changes included moving major components further away from the city of Kamloops and a change in tailings storage technology. These updates were reviewed and modified based on feedback from the Project Working Group. A 30-day consultation period on the revised AIR was held from November 18 to December 18, 2014.

A revised and final AIR was posted to e-PIC on July 23, 2015, taking into account issues raised during the consultation period.

Scope of Project

On January 11, 2012 the EAO issued a second order pursuant to section 11 of the EAA (2002), which prescribed the scope, procedures, and methods to undertake the provincial EA, including public, government agency, and First Nations consultation requirements.

The scope of the Project, originally defined in the section 11 Order and updated in the section 13 amendment, includes the following on-site and off-site components and activities:

- open pit (maximum extent of 261 ha at the end of the 23 year mine life);
- mine maintenance facility;
- crushing and conveying system;
- processing plant;

- tailings distribution and management system;
- tailings storage facility;
- waste rock management facilities;
- water management facilities;
- access road and interchange;
- on-site roads;
- borrow sources;
- transmission line and transformer upgrades;
- natural gas supply line;
- explosives manufacturing and storage facility;
- water supply, including pumphouse upgrades;
- process and potable water system;
- concentrate storage and shipping area; and
- concentrate transport via truck to Port of Metro Vancouver.

Community Advisory Group (CAG)

On February 2, 2012 a multi-stakeholder CAG was established to provide a forum for dialogue and input on the EA process, review information regarding the proposed Project, and provide input into and promote effective communication and engagement between government and specific interest groups and the general public. The members of the Ajax Project Community Advisory Group are identified in Table 4.4-1.

Table 4.4-1. Ajax Project Community Advisory Group Members

Organization	Organization (<i>cont'd</i>)
Aberdeen Community Association	Kamloops Fly Fishers' Association
Aberdeen Highlands Development Corporation	Kamloops Naturalist Club
BC Cattlemen's Association	Kamloops Physicians for a Healthy Environment
Coalition for the Preservation of East Kamloops	Kamloops Stockmen's Association
Ducks Unlimited	Lac Le Jeune Conservation Association
Grasslands Conservation Council of British Columbia	Pineview Community Group
Kamloops & District Fish & Game Association	Thompson Institute of Environmental Studies
Kamloops Area Preservation Association	Thompson Watershed Coalition
Kamloops Astronomical Society	TRU Faculty Association Human Rights Committee
Kamloops Exploration Group	

The CAG held an initial meeting on February 2, 2012. Subsequent monthly meetings, all chaired by the EAO, were held in February to discuss the EA process and review the public consultation plan, in March to review the coordinated EA process, CAG process, and CAG comments submitted on the

draft Public Consultation Plan, and in April to provide feedback on the April 18, 2012 KAM public workshop. A later meeting was held in October 2012 to review the public issues tracking table and the socio-economic section of the dAIR/EIS guidelines. More information on the meetings held and issues raised by the CAG are provided in Section 4.7, Public and Government Agency Information Distribution and Consultation.

4.4.1.3 *Preparation of the Application*

After initial approval of the 2013 AIR/EIS Guidelines, all required baseline studies were completed by KAM, and in preparation of the Application/EIS, the Working Group held targeted meetings to address specific issues, i.e., water quality, noise modeling, and air dispersion studies. An effects assessment was then completed for each valued component (VC) presented in this Application/EIS by applying the assessment methodology described in Chapter 5. Following the data collection effort and analysis, mitigation measures required to avoid, reduce, control, or offset any adverse effects were identified. Additional ongoing monitoring requirements were also identified.

First Nations and Public consultation activities also continued during this period. A First Nations Consultation Plan for the Application Review stage was initially submitted on December 9, 2014 to First Nations for review and comment. Comments were received, discussed and incorporated into an updated First Nations Consultation Plan on April 10, 2015 before being finalized and provided to the BC EAO Project Assessment Lead on June 16, 2015, as required under Section 9 of the Project's section 11 Order. More detailed information on the Aboriginal consultation program is included within Section 4.6 of this Application/EIS.

Under Section 10.1 of the section 11 Order, KAM prepared a Community Consultation Plan (CCP) specifying the consultation activities for the Pre-Application stage. The KGHM Ajax CCP was posted on the e-PIC website on May 17, 2012. In April 2015, an updated CCP that focuses on activities within the Application Review phases was submitted to the BC EAO and subsequently approved on May 11, 2015. Section 4.7 of this Application/EIS provides clarity around Application Review phase activities, and suggests times, possible locations and nature of the open houses held in the Application Review phase public comment periods.

The Proponent prepared the Application/EIS between Q1 2014 to Q3 2015, and the Application/EIS was submitted to the BC EAO on Q3 2015.

4.4.1.4 *Screening of the Application*

After the Application/EIS is submitted, the Executive Director must evaluate the Application/EIS for completeness and decide within 30 days whether to accept it for review; this is referred to as the screening period as required by the EAA (2002). The screening period may be extended at the discretion of the EAO or as requested by the proponent. During the screening period, it is possible that additional information or analyses are required before the Application/EIS can be accepted for review.

A Table of Concordance submitted as part of the Application/EIS will be used by the EA Working Group to screen the Application/EIS against the AIR/EIS Guidelines to determine whether the required information has been adequately provided. If the EAO determines the Application/EIS to be insufficient, the Proponent will be required to address the information deficiencies. If the

Application/EIS contains all of the required information, the EAO will notify the proponent that the Application/EIS has been accepted for a formal, detailed review by the EA Working Group.

4.4.2 Application Stage

4.4.2.1 180-Day Review of the Application

Under the EAA (2002), if the Application/EIS is accepted for review by the BC EAO, a legislated 180-day review period commences. The proponent provides paper and electronic copies of the Application/EIS to the EA Working Group, Aboriginal groups, public libraries, and other stakeholders as directed by the BC EAO. The Application/EIS is also uploaded to the BC EAO's e-PIC website to support public consultation requirements.

During the review period, a public comment period on the Application/EIS will be held to provide the public with an opportunity to review and comment on the Application/EIS. The duration of the public comment period is established by the Executive Director under a section 11 Order. The proponent must have at least one formal comment period of 30 days, and must provide the Project Assessment Lead a written report on the results of its public consultation activities, identifying views, issues, and concerns raised by the public.

KAM will compile, track, and respond to public comments using an issues-tracking table. BC EAO's e-PIC website will post comments received during the public comment period. KAM will be required to submit a public consultation report within 30 days of the close of the Application/EIS comment period.

The Working Group may meet during the 180-day period to discuss substantive technical issues and to provide advice to KAM. Working group members will submit technical written comments for response by KAM, which can take the form of technical memorandums, issues-tracking tables, and/or addendums to the Application/EIS. KAM will be invited to participate in, and present information at the Working Group technical sub-committee meetings.

Aboriginal consultation activities will continue throughout the review of the Application/EIS by both the provincial Crown and KAM. The Proponent will consult with the First Nations in accordance with the process described in the Application/EIS.

Pursuant to Section 27(6) of the BC EAA, the BC EAO may suspend the 180-day review period if additional information is required from the proponent.

4.4.2.2 Assessment Report

During the latter half of the Application review stage, the BC EAO prepares an Assessment Report that summarizes the residual effects of the proposed Project, identifies proposed mitigation measures, evaluates the significance of residual, adverse effects, and summarizes all public concerns and how they have been addressed, and identifies any outstanding issues. Also, the report summarizes all Aboriginal consultation issues raised during the EA process, along with the identification of any unresolved technical or consultation issues. The Assessment Report contains recommendations for the relevant Ministers to consider when deciding if an EA Certificate should be granted.

The EA Certificate is comprised of a Certified Project Description (CPD) and Table of Conditions. The CPD is a description of the physical works of the Ajax Project and describes how the Project must be constructed, operated, decommissioned, and reclaimed. The Table of Conditions will identify conditions that KAM must adhere to, in addition to identifying key mitigation measures and monitoring requirements that KAM must follow during different phases of the Project.

BC EAO will provide copies of these reports to the Working Group, Aboriginal groups, and to KAM for their review and comment prior to being finalized and referred to Ministers for a decision.

4.4.3 Minister's Decision

The BC EAO will compile a referral package for the Minister of the Environment and the Minister of Energy and Mines that includes the Assessment Report and a draft EA Certificate. The Ministers' decision is made within 45 days of a referral and is posted to the BC EAO's e-PIC website. Once issued, the EA Certificate is a legally binding document granting conditional approval for the Ajax Project to proceed. Under Section 18 of the EAA (2002), the Proponent must have substantially started the Project within five years of the issuance of the EA Certificate, or can apply for a one-time extension of the Certificate.

4.4.4 Provincial Milestones

The provincial EA process milestones that have been achieved to date are summarized in Table 4.4-2. For information on CAG meetings and open houses refer to Section 4.7, Public and Government Agency Information Distribution and Consultation.

Table 4.4-2. Provincial Environmental Assessment Process Milestones for the Ajax Project

EA Process Milestones	Date
BC EAO receives Project Description for Review	December 6, 2010
BC EAO receives revised Project Description for Review	February 8, 2011
BC EAO issues Section 10 Order	February 25, 2011
KAM submits dAIR for BC EAO review	April 18, 2011
Initial Working Group Meeting	April 27, 2011
BC EAO receives updated Project Description	May 17, 2011
BC EAO submits first Order under section 11 for a first public comment period	June 3, 2011
KAM submits revised dAIR based on BC EAO comments	June 15, 2011
Public Comment Period on the Project Description	June 8 to July 11, 2011
BC EAO receives final Project Description	July 6, 2011
KAM submits revised dAIR based on public comments	August 11, 2011
Working Group Meeting #2	October 27, 2011
KAM submits updated dAIR based on Working Group comments	January 6, 2012
BC EAO issues additional section 11 Order	January 11, 2012

(continued)

Table 4.4-2. Provincial Environmental Assessment Process Milestones for the Ajax Project (completed)

EA Process Milestones	Date
BC EAO and CEA Agency posts draft AIR/EIS Guidelines for Public Comment	January 11, 2012
Public Comment Period on dAIR/EIS Guidelines	January 11 to March 27, 2012
Health sub-working group meeting	January 24, 2012
Water quality sub-working group meeting	February 27, 2012
Health sub-working group meeting	May 10, 2012
BC EAO posts Ajax Community Consultation Plan	May 17, 2012
Approved AIR posted to e-PIC	June 25, 2013
Revised AIR posted to e-PIC	November 10, 2014
Public Comment Period on the revised AIR	November 18 to December 18, 2014
BC EAO issues Section 13 amendment	July 23, 2015
BC EAO approves AIR and posts to e-PIC	July 22, 2015

4.5 FEDERAL ENVIRONMENTAL ASSESSMENT REVIEW PROCESS

While there are no prescribed phases for a comprehensive study under CEAA (1992), a description of important milestones is provided below. The steps of the federal EA process are shown in Figure 4.5-1.

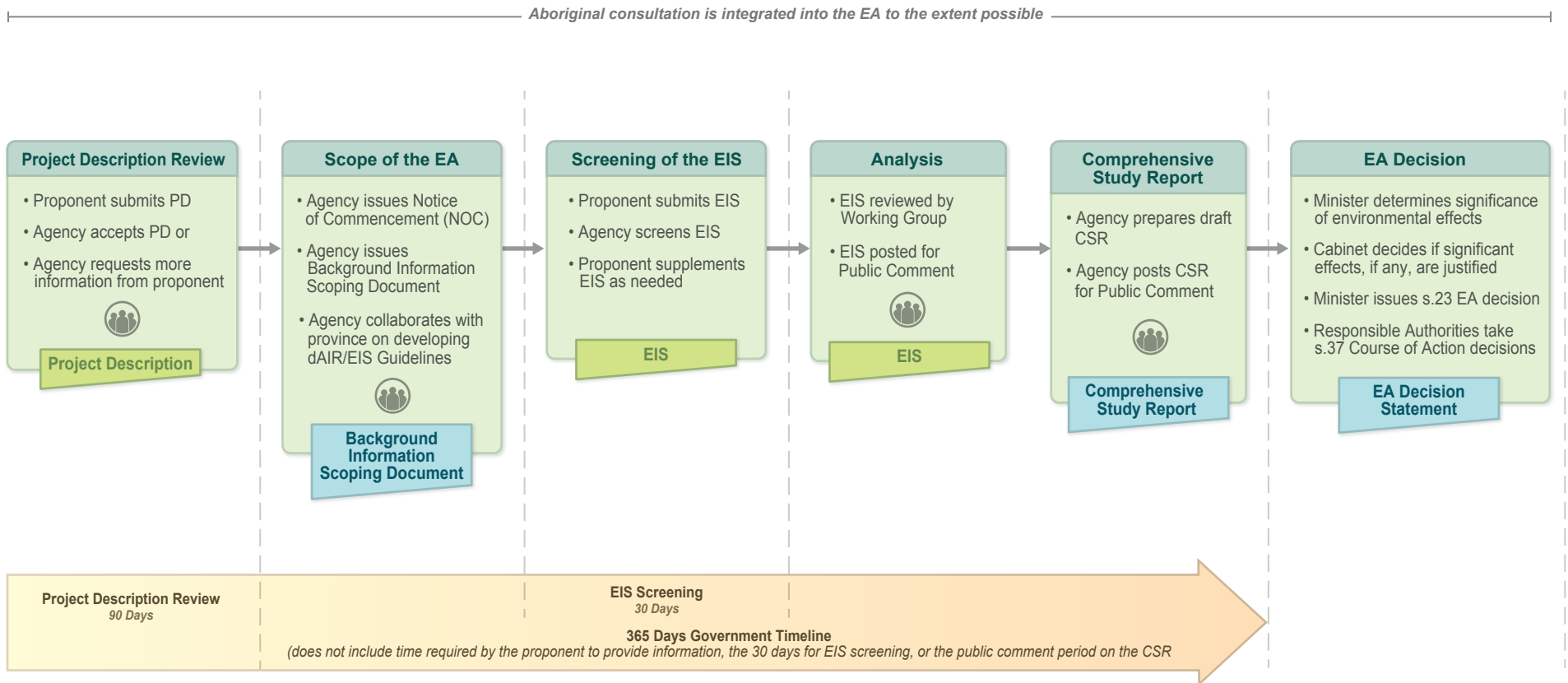
4.5.1 Project Description

The federal EA process commenced with the submission of a Project Description (PD) on December 6, 2010. A revised PD was submitted on February 8, 2011, to address comments from the CEA Agency. Based on early feedback, Aboriginal and Public concerns, and continuing refinements to the project design, a revised version of the Project Description was submitted on May 17, 2011. The Ajax Project Description was screened and accepted for a 90-day review period by the CEA Agency for the purposes of determining whether a federal EA was required for the Project. A final PD was submitted on July 6, 2011.

4.5.2 Notice of Commencement

A Notice of Commencement (NoC) was issued by the CEA Agency on May 31, 2011, and later updated on January 10, 2012, and posted to the Canadian Environmental Assessment Registry Internet Site (CEARIS) stating that a federal EA of the Ajax Project was required. The NoC initiated the beginning of a 365-calendar day government time limit; under the Establishing Timelines Regulation, the “clock” can be stopped at the request of the proponent or the CEA Agency if it is deemed there is insufficient information for the EA process to proceed. Since the NoC was posted, 114 days of government time have elapsed with 251 days remaining.

Figure 4.5-1
Federal Comprehensive Study
Environmental Assessment Process



- Agency: Canadian Environmental Assessment Agency
- CSR: Comprehensive Study Report
- dAIR: draft Application Information Requirements
- EA: Environmental Assessment
- EIS: Environmental Impact Statement
- PD: Project Description
- NOC: Notice of Commencement
- Agency Deliverable
- Proponent Deliverable
- Public Comment Period

4.5.2.1 *Background Information*

As required by the *Jobs and Economic Growth Act* (2010) amendments to CEEA (1992), a Background Information scoping document was posted to the CEARIS on June 1, 2011. The Background Information document identifies the scope of the assessment, factors to be considered, and information related to public participation and Aboriginal consultation. The Background Information document also provides the public with an opportunity to comment on the conduct of the comprehensive study. A public comment period was held between June 8 and July 11, 2011 to seek comments from the public on the Project and its potential environmental effects, to ensure that relevant issues were identified for consideration in the Application/EIS. Based on early feedback and project design changes, the Background Information document was revised and posted to CEARIS on August 26, 2011.

4.5.2.2 *Scope of Project*

As specified in Section 2.0 of the Background Information, the CEA Agency defines the scope of the Project to include the following Project components:

- open pit (maximum extent of 261 ha at the end of the 23 year mine life);
- mine maintenance facility;
- crushing and conveying system;
- processing plant;
- tailings distribution and management system;
- tailings storage facility;
- waste rock management facilities;
- water management facilities;
- access road and interchange;
- on-site roads;
- borrow sources;
- transmission line and transformer upgrades;
- natural gas supply line;
- explosives manufacturing and storage facility;
- water supply, including pumphouse upgrades;
- process and potable water system;
- concentrate storage and shipping area; and
- concentrate transport via truck to Port of Metro Vancouver.

4.5.2.3 *Major Projects Management Office*

The Major Projects Management Office (MPMO) was established in 2007 to provide overarching project management and accountability in the federal EA and regulatory review process. In accordance with the *Cabinet Directive on Improving the Performance of the Regulatory System for Major Resource Projects* (Government of Canada 2012), the Project has been designated as a Major Resource Project.

Under the Government of Canada's Major Resource Project initiative, the MPMO is involved in the federal EA process and works with federal agencies to coordinate agreements and timelines and to track the federal regulatory review process. On August 2011, a Project Agreement was signed between federal authorities participating in the EA process for the Project, which articulates the roles and responsibilities of each federal agency.

4.5.3 **Environmental Impact Statement**

4.5.3.1 *Environmental Impact Statement Guidelines*

In line with the federal-provincial coordination process, the Proponent prepared a single document, the AIR/EIS Guidelines, identifying the information required to be submitted in the Application/EIS. The CEA Agency issued the draft AIR/EIS Guidelines for the Ajax Project on January 11, 2012, which was followed by a public comment period of 75 days from January 11 to March 27, 2012. The final Air/EIS Guidelines was issued on June 3, 2013. As described above in Section 4.4.1.2, the AIR/EIS Guidelines have since been revised due to Project design changes and were re-issued on July 22, 2015.

4.5.3.2 *Preparation of the Environmental Impact Statement*

After the AIR/EIS Guidelines document is approved, the Proponent must complete all required baseline studies and conduct an effects assessment for each VC to determine whether the Project is likely to result in any potentially significant adverse effects. Mitigation measures required to avoid, reduce, or control adverse effects are identified, in addition to any monitoring requirements. This submission of the Application/EIS satisfies this step. Public and Aboriginal consultation activities are ongoing during this period.

4.5.3.3 *Screening of the Environmental Impact Statement*

As prescribed in the Establishing Timelines for Comprehensive Studies Regulations (SOR/2011-139), the review of the Application/EIS starts with a 30-day screening by the CEA Agency to determine whether the information contained in the Application/EIS is complete. As members of the EA Working Group, the CEA Agency and federal agencies will conduct a 30-day screening period of the Application/EIS to determine whether the Application/EIS contains the information outlined in the EIS Guidelines.

If the CEA Agency determines the Application/EIS does not contain the required information, the proponent will receive an Information Request to address information deficiencies. If the Application/EIS contains all of the required information, the CEA Agency will “turn the government clock on” and proceed with a detailed review by the federal members of the EA Working Group.

4.5.3.4 *Review of the Environmental Impact Statement*

The proponent provides paper and electronic copies of the Application/EIS to the EA Working Group, Aboriginal groups, and other stakeholders as directed by the CEA Agency.

During the review period, a joint federal-provincial public comment period on the Application/EIS will be held to provide the public with an opportunity to review and comment on the Application/EIS. Comments will be compiled, tracked, and responded to by KAM using issues-tracking tables, additional memorandums or addendums to the Application/EIS as needed. The EA Working Group reviews the responses provided by the proponent and determines whether the concerns have been adequately resolved. EA Working Group meetings and sub-working group technical meetings are held throughout the review of the Application/EIS to discuss and resolve outstanding technical issues. Aboriginal consultation activities by the provincial and federal governments and by KAM will be ongoing during this period.

4.5.3.5 *Comprehensive Study Report*

The CEA Agency prepares a CSR which summarizes all residual effects of the Project, identifies proposed mitigation, includes an evaluation of significance of adverse effects, summarizes all public concerns and how they have been addressed, and identifies outstanding issues. A summary of all Aboriginal consultation issues that were raised during the EA process is also included. The CSR is provided to the EA Working Group, to Aboriginal groups, and to the proponent for their review and comment. A final opportunity for the public and Aboriginal groups to comment on the federal CSR is provided over a 30-day public comment period via CEARIS.

4.5.4 **Minister’s Decision**

The CSR is submitted to the federal Minister of the Environment seeking a decision under Section 23(1) of CEAA (1992) for the project. After taking into consideration the CSR and any public comments, the Minister of the Environment will issue an EA decision statement that sets out:

- the Minister’s opinion as to whether, taking into account the implementation of any mitigation measures that the Minister considers appropriate, the project is, or is not, likely to cause significant adverse environmental effects; and
- any mitigation measures or follow-up program that the Minister considers appropriate.

The Minister then refers the project back to Responsible Authorities (RAs) to take their course of action decisions under Section 37 of CEAA (1992). In this case, the Project will be referred back to Fisheries and Oceans Canada to take a course of action decision regarding whether to permit the project to proceed (i.e., issue an authorization under the *Fisheries Act* (1985b)), and to Natural

Resources Canada to take a course of action decision regarding whether to issue a licence under paragraph 7(1)(a) of the *Explosives Act* (1985a).

4.5.5 Federal Milestones

The federal milestones that have been achieved through the EA process to date are summarized in Table 4.5-1. For information on CAG meetings and open houses, refer to Section 4.7, Public and Government Agency Information Distribution and Consultation.

Table 4.5-1. Federal Environmental Assessment Process Milestones for the Ajax Project

Federal EA Process Milestones	Date
CEA Agency receives Project Description for Review	December 6, 2010
CEA Agency receives revised Project Description for Review	February 8, 2011
CEA Agency receives updated Project Description	May 17, 2011
CEA Agency determines Comprehensive Study required and commences EA	May 25, 2011
CEA Agency issues Notice of Commencement	May 31, 2011
CEA Agency issues Background Information document	June 1, 2011
CEA Agency informs public federal funding is available*	June 14, 2011
CEA Agency holds public comment period on the Background Information document	June 8 to July 11, 2011
CEA Agency receives final Project Description	July 6, 2011
CEA Agency issues revised Background Information document	August 26, 2011
CEA Agency issues regular funding envelope to participate in the EA*	September 6, 2011
CEA Agency issues aboriginal funding envelope to participate in the EA*	October 21, 2011
CEA Agency issues additional regular funding envelope to participate in the EA*	December 14, 2011
CEA Agency posts updated Notice of Commencement to CEARIS	January 10, 2012
CEA Agency posts dAIR/EIS Guidelines to CEARIS	January 11, 2012
CEA Agency holds public comment period on the dAIR/EIS Guidelines	January 11 to March 27, 2012
CEA Agency posts final AIR/EIS Guidelines to CEARIS	January 3, 2013
CEA Agency issues additional aboriginal funding envelope to participate in the EA*	January 22, 2014
CEA Agency posts revised final AIR/EIS Guidelines to CEARIS	November 18, 2014
CEA Agency holds public comment period on revised AIR/EIS Guidelines	November 18 to December 18, 2014
CEA Agency posts final AIR/EIS Guidelines to CEARIS	July 22, 2015

* Refer to Section 4.5.6 below.

4.5.6 Federal Participant Funding Program

Pursuant to subsection 58(1.1) of CEAA (1992), a participant funding program (PFP) was established for comprehensive studies to facilitate the participation of the public and to support consultation activities for potentially affected Aboriginal groups in federal and joint EA processes. A FRC (FRC), independent of the EA review process, is established to assess applications for funding, and to recommend funding allocations for applicants. Disbursements are allocated to support participation and/or consultation activities for both pre- and post-Application/EIS submission. Two funding envelopes are established: a Regular Funding Envelope (RFE) to support members of the public, and an Aboriginal Funding Envelope (AFE).

Funding from the AFE may be provided to Aboriginal groups who plan to engage in Aboriginal consultation activities with the federal government that are linked to the EA of a proposed project. The funds can be used to support their engagement in consultation activities and to provide input into the EA process. The RFE is established to provide funding for individuals, Aboriginal groups, and incorporated not-for-profit organizations to participate in the EA review process. Parties applying to either funding envelope must meet certain eligibility criteria:

- have a direct, local interest in the project, such as a residence in the area or historical or cultural ties to the area likely affected by the project;
- have community knowledge or Aboriginal traditional knowledge relevant to the EA; and/or
- have expert information relevant to the anticipated environmental effects of the proposed project.

Aboriginal Funding Envelope

On October 21, 2011, a total of up to \$329,700 was made available under the AFE for the Project to support Aboriginal participation and related consultation activities in the EA, including:

- preparing for and participating in internal community meetings;
- preparing for and participating in consultation meetings;
- reviewing and commenting on the dAIR/EIS Guidelines;
- reviewing and commenting on the Application/EIS; and
- reviewing and commenting on the CSR.

Five Aboriginal groups applied for funding; all groups were found to be eligible for PFP-AFE funding, and the total amount of \$329,700 was granted to support Aboriginal participation in the EA and related consultation and community engagement activities. The FRC's decision was posted on CEARIS on October 21, 2011.

On January 22, 2014 an additional \$40,000 was allocated to the Whispering Pines/Clinton First Nation, Shuswap First Nations. The allocated funds are identified in Table 4.5-2.

Table 4.5-2. Participant Funding Program Allocations - Aboriginal Funding Envelope

Applicant	Allocation
TK'emlups (Kamloops) Indian Band	\$147,050
Skeetchestn Indian Band #687	\$102,000
Lower Nicola Indian Band	\$30,150
Métis Nation British Columbia	\$25,700
Ashcroft Indian Band	\$24,800
Whispering Pines/Clinton First Nation	\$40,000
Total	\$369,700

Regular Funding Envelope

On June 14, 2011, a total of up to \$50,000 was made available under the RFE to facilitate the participation of the public in the Comprehensive Study EA review process, including:

- attending community-specific meetings (e.g., open houses);
- reviewing and commenting on the Application/EIS; and
- reviewing and commenting on the CSR prepared by the CEA Agency.

Three applications were received; all were found to be eligible for PFP-RFE funding, and a total of \$32,225 was granted to support public participation in the EA. The FRC's and the President of the CEAA's decision was posted on CEARIS on September 6, 2011. Another application was reviewed, and on December 14, 2011 an additional amount of \$15,915 was granted to the Sierra Club BC. The total allocated funds are identified in Table 4.5-3.

Table 4.5-3. Participant Funding Program Allocation - Regular Funding Envelope

Applicant	Allocation
Grasslands Conservation Council of British Columbia, on behalf of the Kamloops Naturalist Club and the Kamloops District Fish and Game Association	\$18,700
Sharon Antoniak on behalf of Kamloops Area Preservation Association	\$11,950
Susan McGillivray	\$1,575
Sierra Club BC	\$15,915
Total	\$48,140

4.6 ABORIGINAL INFORMATION DISTRIBUTION AND CONSULTATION

This section summarizes the engagement and consultation undertaken with Aboriginal Groups for the Application/EIS during the Pre-Application period (Section 4.6.1). It also summarizes the plan for consultation with Aboriginal Groups during the Application review period (Section 4.6.2). Section 15 (Procedural Aspects of Aboriginal Consultation) provides a detailed description of consultation undertaken until March 31, 2015.

This section summarizes the engagement and consultation undertaken with Aboriginal Groups for the Application/EIS during the Pre-Application period. It also summarizes the plan for consultation with Aboriginal Groups during the Application review period. Section 15, Procedural Aspects of Aboriginal Consultation, provides a detailed description of consultation undertaken with each Aboriginal Group until July 31, 2015.

The BC EAO formally delegated aspects of its consultation responsibilities to KAM through an Order issued under section 11 of the BC EAA on January 11, 2012. The section 11 Order identifies the Project “First Nations” as the Stk’emlupsemc te Secwépemc Nation (SSN), which is comprised of the Tk’emlúps te Secwépemc (TteS) and Skeetchestn Indian Band (SIB), whom KAM is required to consult regarding potential Project effects on their Aboriginal interests as well as their perspectives on the Project. The section 11 Order also identifies “Working Group First Nations” comprised of the Lower Nicola Indian Band (LNIB) and Ashcroft Indian Band (AIB). The section 11 Order directs KAM to provide information to the LNIB and AIB regarding the Project, specifically the Application/EIS. On July 23, 2015, the BC EAO issued the section 13 Order as an amendment to the requirements outlined in the section 11 Order, directing KAM to provide information to the WP/CIB regarding the Project as a “Notification First Nation”. In addition to the Aboriginal groups identified above, the CEA Agency identifies the Métis Nation British Columbia (MNBC) as potentially affected by the Project. In a letter dated June 9, 2014, the CEA Agency advised KAM that it should consult Aboriginal groups at different depths as described in Table 4.6-1.

Table 4.6-1. Aboriginal Groups Consultation Requirements

Aboriginal Group	BC EAO’s Section 11 and Section 13 Orders	CEA Agency Consultation Depth*
Stk’emlupsemc te Secwépemc Nation	First Nation	High
Ashcroft Indian Band	Working Group First Nation	Moderate
Lower Nicola Indian Band	Working Group First Nation	Moderate
Whispering Pines/Clinton Indian Band	Notification First Nation	Moderate
Métis Nation British Columbia	Not mentioned	Low

* Depth of consultation varies depending on seriousness of impacts and strength of claim.

4.6.1 Pre-Application/EIS Consultation

This subsection summarizes Pre-Application/EIS communication, information sharing, and consultation undertaken with each Aboriginal Group. Detailed descriptions of consultation with each Aboriginal Group are presented in Section 15.3, Pre-Application/EIS Consultation. A summary of communications with Aboriginal Groups is provided in Appendix 15 A. Appendix 15-B, Aboriginal Issues Tracking Tables, presents a comprehensive list of issues raised by each Aboriginal Group and KAM responses.

4.6.1.1 Information Distribution Methods

Methods and tools utilized to share information and consult with Aboriginal Groups during the Pre-Application/EIS period include the following:

- **Early Notification.** KAM contacted leadership for each Aboriginal Group to notify them about the Project and request introductory meetings, seek a point-of-contact and identify group-specific consultation policies, protocols or preferences.
- **Site Tours.** To support information sharing, KAM hosted site tours to the Project site. The site tours are designed to introduce and familiarize Aboriginal Groups and the public with the mine site and provide more information about the Project. Site tours began in the Pre-Application phase and are on-going.
- **Meetings with Aboriginal Leadership.** KAM met with Aboriginal Group leadership to provide opportunities to provide opportunities to present information on the Project, exchange information and identify the concerns and interests of Aboriginal Groups.
- **Stakeholder Issues and Information Management System.** KAM is committed to meaningful consideration of the concerns, interests, and issues of Aboriginal Groups. Information is captured in a formal information management system. The database system allows for tracking and monitoring of contact information, meeting attendance, types of meetings (e.g. community meetings, one-on-one meetings) held, date and time of contact, and detailed summaries of what was discussed. Issues are tracked in the stakeholder issues and information management system and distributed to appropriate scientific teams to ensure the information is carefully considered in the baseline studies, effects assessments, and mitigation and monitoring strategies.
- **Project Website and Blog.** In 2011, a Project website and blog (www.ajaxmine.ca) were developed to facilitate information sharing and distribution. The website presents a range of information such as Project facts, the management team, Project history, site tours, newsletters, FAQs and answers, as well as copies of technical reports and presentations such as Blasting Reports and the Feasibility Study. The website also includes a Google Earth tool that allows users to see the progression of the Project from Construction to Closure.
- **Project Office.** In July 2011, KAM opened a Project office in downtown Kamloops to specifically give Aboriginal community members and the public a place where they could learn about the Project, ask questions, and share their perspectives and opinions.

- **Project Materials.** KAM developed a range of materials to support Project consultation, such as Project fact sheets, Project storyboards and displays, brochures, 3-dimensional model and multi-media tools and baseline study summaries, and shared via e-mails, letters, at community presentations, and other forums. KAM updated materials as needed to match current Project status (Appendix 15-F).
- **Creation of an External Affairs Team.** KAM created an External Affairs Team, including community relations specialists, a First Nations Liaison Specialist, and external affairs specialists, to facilitate information distribution and consultation.

4.6.1.2 Environmental Assessment Procedures

This subsection summarizes consultation conducted with Aboriginal Groups as part of the EA procedures, including notification of the project, Working Group meetings, and development of the AIR/EIS Guidelines. Additional details are provided in Section 15.

Notification of the Project

The SSN were notified of the Project in February 2006 when Abacus Mining and Exploration Corporation began early consultation efforts. After the section 10 Order was issued by BC EAO on February 25, 2011 CEA Agency also determined that the Project was subject to an EA and the federal process began with a Notice of Commencement dated May 31, 2011.

KAM notified AIB and LNIB about the Project through a letter provided on January 19, 2011, prior to submission of the Project Description. KAM notified WP/CIB in March 2013 and MNBC in January 2012.

Ajax Project EA Working Group

The SSN, AIB, and LNIB participated in a number of Working Group meetings held between 2011 and 2014, as summarized in Table 4.6-2. Through the Working Group, the SSN, AIB, and LNIB were provided with opportunities to review and comment (verbal and written) on the selection of VCs for the effects assessment, design of the baseline study programs, environmental and socio-economic studies, and any issues and information requirements related to the EA.

Table 4.6-2. Ajax Project Working Group Meetings

Date	Topics of Discussion	Participating Aboriginal Group
EA Working Group Meetings		
April 27, 2011	<ul style="list-style-type: none"> • Federal and Provincial EA Processes • Project Description • Working Group Questions and Answers • First Nation Consultation Program • KAM Study Program • Preliminary Issue Identification 	SSN

(continued)

Table 4.6-2. Ajax Project Working Group Meetings (continued)

Date	Topics of Discussion	Participating Aboriginal Group
October 27, 2011	<ul style="list-style-type: none"> • Draft AIR/EIS Guidelines – Issues and Responses • Role and responsibilities of the Working Group • Working Group Issues Tracking Table • Creation of sub-working groups 	SSN
June 23, 2014	<ul style="list-style-type: none"> • Project update • Updated General Arrangement • Draft AIR/EIS Guidelines updates • Waste rock and tailings management • Water resources (Jacko Lake and Peterson Creek) • Air quality and dust control • Public consultation 	SSN AIB LNIB
July 7, 2015 - Session I	<ul style="list-style-type: none"> • Overview of Application • Project Description • Project Alternatives • Geochemistry • Water Quantity and Quality • Fish and Aquatics 	SSN LNIB
July 8, 2015 - Session II	<ul style="list-style-type: none"> • Noise and Vibration • Air Quality • Human Health Ecological Risk Assessment • Social VCs • Accidents and Malfunctions 	SSN LNIB
July 9, 2015 - Session I	<ul style="list-style-type: none"> • Terrestrial Wildlife • Soils and Reclamation • Archaeology • Part C (Aboriginal Groups Information Setting and Background; Procedural Aspects of Consultation; Aboriginal Interests (Rights and Title)) 	SSN LNIB
Health Sub-Working Group Meetings		
January 24, 2012	<ul style="list-style-type: none"> • Project update • Draft AIR/EIS Guidelines development • Air quality and dust control • Noise and vibration • Vegetation and plant communities • Health risk assessment • First Nation engagement and community relations 	SSN
May 10, 2012	<ul style="list-style-type: none"> • Draft AIR/EIS Guidelines development • Assessment of effects on air quality and noise • Noise modelling plan • Air dispersion modelling plan 	SSN

(continued)

Table 4.6-2. Ajax Project Working Group Meetings (completed)

Date	Topics of Discussion	Participating Aboriginal Group
July 8, 2015	<ul style="list-style-type: none"> • Air Quality Model and Results • Human Health Ecological Risk Assessment • Questions and Discussion 	SSN LNIB
Water Quality Sub-Working Group Meetings		
February 27, 2012	<ul style="list-style-type: none"> • Draft AIR/EIS Guidelines development • Overview of water quality conditions (Inks Lake, Jacko Lake) • Geochemical characterization program (waste rock and tailings) • Dust control • Further discussion on cumulative effects 	SSN AIB
May 16, 2012	<ul style="list-style-type: none"> • Design of the TSF • Water seepage and discharge • Water flow in Inks Lake and Jacko Lake • Effluent discharge • Tailings seepage into groundwater • Kinder Morgan pipeline • Dust control • Reclamation plan 	SSN
Social Sub-Working Group Meeting		
July 8, 2015	<ul style="list-style-type: none"> • Socio-economic Effects Assessment • Noise and Vibration Effects Assessment • Questions and Discussion 	SSN LNIB
Fish and Aquatics Sub-Working Group Meeting		
July 8, 2015	<ul style="list-style-type: none"> • Fish Habitat Offsetting • Questions and Discussion 	SSN LNIB

Comments provided were considered in the development of the VCs, the AIR/EIS Guidelines, and other aspects of the Application/EIS. For a comprehensive discussion on how comments have been incorporated, refer to Section 15.

AIR/EIS Guidelines

BC EAO provided Aboriginal Groups with opportunities to review and comment on drafts of the AIR/EIS Guidelines. Comments received from Aboriginal Groups were considered and, where applicable, incorporated into the AIR/EIS Guidelines. Key topics raised, specific to each Aboriginal Group, on the AIR/EIS Guidelines are included in Appendix 15-B of Section 15, Procedural Aspects of Aboriginal Consultation.

4.6.1.3 Consultation Activities

Stk'emplupsemc te Secwépemc Nation

Consultation activities undertaken with the SSN during the Pre-Application period include EA funding, capacity building, a TK/TLU study, community meetings, site tours, and meetings with SSN representatives, summarized below and detailed in Section 15. Table 4.6-3 presents an overview of consultation activities with SSN.

Table 4.6-3. Summary of Consultation Activities with SSN

Summary of Consultation	Number/Yes/No
Consultation Activities Undertaken	
Number of Recorded Meetings	65
Number of Community Meetings	4
Number of Site Tours	7
Capacity Funding	Yes
Information Sharing and Consultation	
First Nations Consultation Plan	Yes
First Nations Consultation Report	Yes
Shape Files, metadata files for drill holes, 3-D models, mineral tenures, LiDAR video	Yes
Draft AIR/EIS Guidelines	Yes
Press Releases	Yes
Archaeological Field Work	
Participated	Yes
Field Program and Permit Notification	Yes
Participated in Knowledge Studies	
Cultural Heritage Study	Yes
Preliminary Mitigation Report	Yes

First Nations Consultation Plan and Reporting. As directed in subsections 9.2 and 13.1 of the section 11 Order, KAM developed a First Nations Consultation Plan (FNCP; Appendix 15-C) to guide its activities and responsibilities in the consultation process with the SSN during the Pre-Application and Application review periods. With respect to consultation preferences, meetings were held regarding SSN's preferred consultation approaches for the Pre-Application and Application review period, during which SSN identified a framework for consultation (discussed in Section 15, Procedural Aspects of Aboriginal Consultation).

The FNCP aims to ensure that Aboriginal Groups are engaged in a manner that is effective and respectful of the preferred engagement and consultation approaches. KAM will continue to consult SSN throughout the Pre-Application and Application review periods and will be flexible to meet SSN consultation expectations. The FNCP:

- describes consultation under the regulatory process (established by the BC EAO and CEA Agency);
- identifies consultation objectives and methods, including protocols and policies, and procedures for dispute resolution;
- identifies approach to consultation documentation, including tracking of records and other correspondence;
- provides a summary of consultation activities conducted to date and planned consultation initiatives for the remaining Pre-Application period;
- describes key issues raised to date by the SSN; and
- proposes future consultation activities the Application review periods.

KAM implemented, and to the extent possible, completed all consultation described in the FNCP. A draft of the FNCP was provided to the SSN for review and comments on December 9, 2014. KAM received comments from the SSN on February 2, 2015. KAM met with SSN to discuss these comments on February 4, 2015. A revised FNCP, addressing SSN comments, was provided to SSN on April 10, 2015. On May 4, 2015, the SSN and KAM exchanged further emails about how best to receive any additional comments from SSN on the FNCP. On May 20, 2015, KAM provided SSN with a track changes version of the FNCP to further facilitate their review. KAM also notified the SSN that it views the FNCP as an iterative document that can be revised with SSN input over the various Project phases. On June 10, 2015, the SSN acknowledged KAM's efforts to incorporate SSN input into the FNCP and provided additional comments. KAM tracked these comments (see Appendix 15-D) and incorporated these comments into a final FNCP issued on June 19, 2015. Appendix 15-D (Comments received on the First Nation Consultation Plan) provides a detailed list of the comments received from SSN on the FNCP and KAM's responses. It also explains how the comments were considered in the revised FNCP.

Pursuant to subsections 13.1 and 13.2 of the section 11 Order, KAM prepared a First Nation Consultation Report detailing the consultation undertaken with the SSN in relation to the Project. This was provided to the SSN for comments on July 13, 2015. In previous correspondence, SSN requested to review copies of the SSN Issues Tracking Table and the Summary of Communication. Versions of Appendix 15-A (Summary of Communication with Aboriginal Groups) and Appendix 15-B (Aboriginal Groups Issues Tracking Tables) were also provided with information only related to the SSN were provided to SSN on July 13, 2015. At the time of writing, no comments were received from SSN on these documents, including the First Nation Consultation Report. A copy of the First Nation Consultation Report is provided in Appendix 15-E.

Environmental Assessment Funding. KAM provided a range of funding to the SSN to facilitate their involvement in the EA process and ensure an accurate understanding of SSN's Aboriginal Interests. The following funding has been provided:

- **Negotiation Agreement.** In July 2008 Abacus Mining and Exploration Corporation (predecessor to KAM) and the SSN signed a Negotiation Agreement. The agreement included principles for negotiating a Project Agreement (i.e., joint cooperation and collaboration, mutual respect, and open and regular dialogue and communication). This Negotiation Agreement terminated on July 31, 2009, according to its terms.
- **Memorandum of Understanding for Capacity Funding and Project Agreement.** In December 2012, the SSN and KAM signed a Memorandum of Understanding (MOU). The purpose of the MOU was to set out the commitments the SSN and KAM made to negotiate (i) a Capacity Funding Agreement (CFA) for engagement and consultation on the Project; and (ii) a Project Agreement.
- **Negotiations for a Capacity Funding Agreement.** In October 2014, the SSN and KAM signed a CFA after a series of negotiation meetings. The Agreement supports SSN's participation in the Pre-Application period of the EA process through involvement in consultation activities, effects assessments, mitigation, provision of socio-economic and health information, and community consultation.
- **Traditional Knowledge/Traditional Land Use Funding for the Cultural Heritage Study.** On December 10, 2012 the SSN and KAM signed a Cultural Heritage Study (CHS) Agreement providing funding for SSN to develop a TK/TLU study for use in the Application/EIS. The goal of the CHS is to provide historic and contemporary TK/TLU data within the vicinity of the Project and involve SSN in identification of mitigation measures (Preliminary Mitigation Report). The deliverable also informed KAM decisions and provided content for use in the Application/EIS. The Agreement includes a description of expected timelines, deliverables and funding allotment for the preparation of the CHS.

The CHS was designed as a regional study focused on the former Ajax Mine footprint and the surrounding area. The deliverable schedule for the CHS was designed to provide KAM with interim materials to inform project decision, and provide TK/TLU data for consideration in the Application/EIS. The SSN provided the final CHS on November 5, 2014. KAM provided SSN with additional funding to complete a CHS on the southern portion of the updated GA. The SSN were to provide the updated CHS on February 28, 2015, however an extension was requested noting they require a full seasonal round (one year) to complete it.

In addition to the CHS, KAM provided funding to the SSN to develop a Preliminary Mitigation Report identifying culturally sensitive mitigation. The 30-page Preliminary Mitigation Report describes SSN perspectives about potential Project effects on its Aboriginal interests. However, the Report does not provide mitigation suggestions, noting that there is a lack of information from effects assessments and a lack of understanding about Project design changes.

Detailed information on the development of the CHS is included in Section 15.3.2.3, Consultation Activities.

Capacity Building. The SSN continue to express an interest in capacity building. To support these requests, KAM has organized a number of contracting, employment, and training opportunities (detailed in Section 15.3.2.3), including:

- working on development of an SSN Human Resources plan;
- working on supporting future employment opportunities for SSN members, which involves developing a strategy to provide training to SSN members;
- developing a procurement strategy giving specific consideration to SSN companies during the bid evaluation process;
- contracting SSN businesses (such as the Stk'emlupsemc Amalgamated Ventures Inc. and Stk'emlupsemc Forestry Development Co.);
- contracting SSN archaeology field assistants, which involves participation in the AIA work as well as archaeological monitoring;
- contracted drilling services for the Project site to a business partnership between the SSN and Target Drilling in 2014;
- awarded Stk'emlupsemc Enterprises Incorporated (the business arm of the SSN) a contract to complete all civil works on site in 2015 and T'n'T Janitorial all janitorial service requirements until 2016;
- participated in on-going discussions about future contracting opportunities with SSN for drilling-related services and the potential construction of temporary housing and worker camps for the Project;
- delivered presentations in 2013 and 2015 on future career opportunities in mining at the Skeetchestn Career Fair at Sk'elep School;
- provided on-going capacity funding to SSN for distribution to TteS and SIB; and
- funded an initiative called "Street School" and sponsored a range of community events.

Between July 2013 and July 2015, SSN companies were awarded over \$3.5 million in related contracting opportunities.

Socio-economic Baseline Studies. Since December 2011, KAM has engaged with and consulted the SSN to gather socio-economic baseline information (discussed further in Section 15). On March 7, 2015, KAM provided the draft socio-economic baseline report (Section 8.4) and the Background and Aboriginal Group Setting (Section 12), specific to the SSN, for review. On May 1, 2015, KAM received a formal response from SSN regarding Section 8.4 socio-economic baseline report. SSN requested more community-specific information be included in the report and concluded the draft baseline report did not meet their needs and was lacking in both depth of information and temporal scope.

On May 21, 2015 KAM sent a response letter to the SSN, noting additional information incorporated into the socio-economic baseline (obtained from letters and meetings and relevant portions of SSN's affidavits with respect to the Kinder Morgan Trans Mountain Pipeline Expansion Project; and gathered from other community-specific information). KAM also noted that the assessment of cumulative effects follows the guidelines set forth by BC EAO and the CEA Agency; however, KAM

considered the information provided by SSN in respect of the Legacy of Wrongs and incorporated it into Section 12 (Background and Aboriginal Group Settings).

Community Meetings. KAM held a total of four community meetings with the SSN in 2015. Two Community Information Sessions were held in each First Nation community respectively (TteS and SIB), discussed in Section 15.3.2.3, Consultation Activities. During these meetings, KAM delivered PowerPoint presentations (see Appendix 15-F for a copy of materials presented) which focused on project overviews, changes to the mine design and arrangement of facilities, and the project development schedule.

Site Tours. KAM facilitated one site tour prior to 2011 and five site tours from 2011 to 2014 for the SSN, including one site tour for members of the Working Group in June 2014. These are further discussed in Section 15.3.2.3, Consultation Activities.

Meetings. KAM and the SSN participated in over 65 recorded meetings (primarily in-person with two teleconference meetings) between January 1, 2011 and July 31, 2015 (one additional formal meeting was held prior to 2011). Details with respect to these meetings are included in Appendix 15-A. Although the CFA aims to support SSN participation in meetings, KAM has only been able to secure two technical meetings since funding was provided. At the time of writing, the SSN had declined to meet on technical matters in 2015.

Information Sharing and Related Consultation. KAM invited the SSN to attend community information sessions in September 2013. The purpose of these sessions was to illustrate how studies are being conducted for the Application/EIS, including the information and criteria the studies would consider, and the development of test models. KAM also sought feedback from the SSN on the various sections of the Application/EIS, including the following:

- Baseline reports – Socio-economic (only information pertaining to SSN), fish and fish habitat, water quality, archaeological, heritage, wildlife, and vegetation;
- Section 8.5 – Current Use of Lands and Resources for Traditional Purposes provided on July 21, 2015. At the time of writing, feedback was only received on the socio-economic baseline report.
- Section 12 – Background and Aboriginal Group Setting provided on March 7, 2015. Preliminary feedback was received on July 14, 2015. SSN provided KAM with reference material to help in revising Section 12 focusing on Secwépemc stories, traditions and governance. These sources (to the extent that they were not already incorporated from the CHS) were added to Section 12;
- Section 13 – Aboriginal Interests (Rights and Title) provided on July 30, 2015. At the time of writing, no feedback from SSN was received;
- Section 14 – Other Potential Effects on Aboriginal Interests provided on July 24, 2015. At the time of writing, no feedback was received from SSN; and
- Section 15 – Procedural Aspects of Consultation provided on July 13, 2015 (represents the First Nation Consultation Report document). At the time of writing, no feedback from SSN was received.

On July 24, 2015, KAM offered to meet with the SSN to review the sections of the Application/EIS that were provided. KAM also offered to deliver presentations to the SSN summarizing the results from the sections. At the time of writing, meetings were not held.

In July 2013, KAM established an operational policy whereby the SSN are notified prior to any planned site disturbances. The intention of this policy is to ensure that the SSN are able to assess the area ahead of any disturbance while accommodating SSN's concerns with respect to specific sites or potential areas of cultural importance. In August 2013, KAM also implemented a site disturbance policy which stipulates requirements to share details of Notice of Work/Multi-Year Area Based Permitting Applications with SSN prior to formal submission to regulators (with one month of advance notice). See Section 15 for additional details.

Ashcroft Indian Band and Lower Nicola Indian Band

Consultation activities undertaken with the AIB and LNIB during the Pre-Application/EIS period includes EA funding, capacity building, meetings, site tours, and information sharing, summarized in Table 4.6-4 and detailed in Section 15, Procedural Aspects of Aboriginal Consultation. A summary of communications is provided in Appendix 15-A.

Table 4.6-4. Summary of Consultation Activities with AIB and LNIB

Consultation Activity	Description of Consultation	
	Ashcroft Indian Band	Lower Nicola Indian Band
Environmental Assessment Funding	AIB has noted they are in full support of the Project and wrote a letter to this effect to the BC EAO, CEA Agency, BC MARR, and BC MFLNRO on October 24, 2014. Consultation and Benefits Agreement also endorsed on October 24, 2014.	LNIB signed an agreement with KAM in July 2015 providing funding to facilitate community meetings and engagement with LNIB throughout the Pre-Application/EIS and Application/EIS review stages of the Project.
Information Sharing	Expressed an interest in capacity-building through employment, training, and economic opportunities. KAM agreed to share information on these topics with AIB as it becomes available.	Expressed interest in capacity-building through employment, training, and economic opportunities. KAM continues to share information on employment, procurement and training opportunities as it becomes available.
Meetings	Met five times during the Pre-Application period. Details provided in Appendix 15-A.	Met eight times during the Pre-Application period. Details provided in Appendix 15-A.
Site Tours	Attended BC EAO Working Group site tour on June 23, 2014.	Attended site tour on January 19, 2015.
Information Sharing	Ongoing written communications between AIB and KAM via letters and e-mails. KAM shared copies of the draft socio-economic baseline (only information pertaining to AIB) and sections of the Application/EIS (in Chapters 12 to 14) as well as Section 8.5 (Current Use of Lands and Resources for Traditional Purposes) KAM requested AIB provide feedback on these sections but at the time of writing, no comments were received.	Ongoing written communications between LNIB and KAM via letters and e-mails. KAM also sought feedback on the socio-economic baseline (only information pertaining to LNIB) and sections of the Application/EIS (in Chapters 12 to 14) as well as Section 8.5 (Current Use of Lands and Resources for Traditional Purposes) KAM requested LNIB provide feedback on these sections but at the time of writing, no comments were received.

Whispering Pines/Clinton Indian Band

Activities undertaken with WP/CIB during the Pre-Application/EIS period include EA funding, meetings, site tours, and information sharing, summarized in Table 4.6-5 and discussed in detail in Section 15, Procedural Aspects of Aboriginal Consultation. A detailed summary of communications is provided in Appendix 15-A.

Table 4.6-5. Summary of Consultation Activities with WP/CIB

Consultation Activity	Description of Consultation with WP/CIB
Environmental Assessment Funding	Capacity Funding Agreement signed in May 2015.
Meetings	Three in-person meetings during Pre-Application period. Details provided in Appendix 15-A.
Site Tours	KAM offered to provide site tour for WP/CIB with no response received to date. Negotiations still underway at time of writing.
Information Sharing	On-going written communications between WP/CIB and KAM via letters and e-mails. KAM also sought feedback on the socio-economic baseline (only information pertaining to WP/CIB) and sections of the Application/EIS (in Chapters 12 to 14).

Métis Nation British Columbia

Activities undertaken with MNBC during the Pre-Application/EIS period include EA funding, meetings, site tours, and information sharing, summarized in Table 4.6-6 and discussed in detail in Section 15, Procedural Aspects of Aboriginal Consultation. A detailed summary of communications is provided in Appendix 15-A.

Table 4.6-6. Summary of Consultation Activities with MNBC

Consultation Activity	Description of Consultation with MNBC
Environmental Assessment Funding	KAM developed an information sharing agreement providing funding for community meetings, a review of MNBC's harvester database, one-on-one data gathering activities. MNBC provided the "MNBC-KGHM/Ajax Mine Initial Project Report, January 2015", summarizing land use information and included comments and concerns regarding the Project, Métis harvesting philosophy, harvesting data, and estimates of Harvester Card holders. MNBC also provided "MNBC Working on Behalf of Métis People in BC" and "MNBC-KGHM/Ajax Mine Socio-economic Report – March 2015", containing socio-economic information.
Information Sharing	Expressed interest in capacity-building through employment, training, and economic opportunities. Provided KAM with Industry Protocol and KAM shared preliminary employment, procurement and training opportunities with MNBC.
Meetings and Community Meetings	KAM participated in three community meetings in November held in Kamloops, Merritt, and Ashcroft (presentations delivered by KAM included in Appendix 15-F). Three in-person meetings and several teleconference discussions during the Pre-Application period. Details provided in Appendix 15-A.

(continued)

Table 4.6-6. Summary of Consultation Activities with MNBC (completed)

Consultation Activity	Description of Consultation with MNBC
Site Tours	KAM offered to provide site tour for MNBC with no response received to date. Negotiations still underway at time of writing.
Information Sharing	On-going written communications between MNBC and KAM via letters and e-mails. KAM also sought feedback on the socio-economic baseline (only information pertaining to MNBC) and sections of the Application/EIS (in Chapters 12 to 14).

4.6.1.4 Issues and Concerns Raised by Aboriginal Groups

KAM has tracked the issues, concerns, and interests identified by Aboriginal Groups throughout the consultation process. Appendix 15-B, Aboriginal Groups Issues Tracking Tables, provides a detailed list of the issues raised by each Aboriginal Group during the Pre-Application period and KAM's responses to these issues. Issues were compiled from comments provided by Aboriginal Groups at Working Group meetings, comments on the draft AIR/EIS, consultation and meetings (e.g., community meetings, site tours, etc.), and comments provided in written correspondence.

Table 4.6-7 provides a general overview of the issues raised by Aboriginal groups, including KAM responses to these issues. Refer to Section 15, Procedural Aspects of Aboriginal Consultation, and Appendix 15-B, Aboriginal Groups Issues Tracking Tables, for a detailed discussion of comments, issues, and respective responses.

Table 4.6-7. Overview of Issues Raised by Aboriginal Groups

Category	Overview of Issue	KAM Response
Water Quality and Quantity	Potential negative effects to waterbodies such as Jacko Lake, Peterson Creek, and the Thompson River from changes in surface and groundwater quality/quantity or potential contamination from acid rock drainage	<p>Potential effects of the Project to surface water quality (including Jacko Lake, Peterson Creek, and the Thompson River) will be assessed in Section 6.3 of the Application/EIS. Potential effects of the Project to groundwater quality will be assessed in the EA Application in Section 6.5 of the Application/EIS. The Application/EIS will propose mitigation strategies and any required treatment processes to protect water quality.</p> <p>KAM will monitor water quality on an on-going basis throughout the life of the Project and will implement Surface and Groundwater Management and Monitoring Plans to protect human and environmental health through all phases of the Project (Sections 11.23 AND 11.24 of the Application/EIS).</p> <p>The Proponent is conducting a geochemical characterization of waste rock. Detailed results of the analysis will be included in the Application/EIS.</p> <p>KAM will implement an Acid Rock Drainage Management and Monitoring Plan (refer to Section 11.5 of the Application/EIS).</p>

(continued)

Table 4.6-7. Overview of Issues Raised by Aboriginal Groups (continued)

Category	Overview of Issue	KAM Response
Fish populations and fish habitat	Potential effects to fish and fish habitat in Jacko Lake as a result of blasting vibrations or changes in the availability of fish populations	Potential effects on fish populations and fish habitat, including potential effects from noise and vibration, will be assessed in Section 6.7 of the Application/EIS. KAM understands the importance of Jacko Lake to the SSN and other groups therefore potential effects on Jacko Lake will be summarized as a supporting topic in Section 8.7 of the Application/EIS. This will describe potential effects in relation to changes in land and resource use, fish populations and fish habitat, and other valued components, as appropriate. Chapter 13 (Aboriginal Interests) of the Application/EIS will assess effects to the right to fish in Jacko Lake by examining how changes in species availability, access, changes in the quality of the fish and changes to the experience of fishing.
Wildlife and wildlife habitat	Potential effects on wildlife from noise, artificial light, disruption in movements and migration patterns	Potential effects of the project on Wildlife – including habitat loss, disturbance and displacement and mortality – and measures to mitigate potential adverse effects will be described in Sections 6.11 to 6.17 of the Application/EIS. Effects on wildlife will be monitored through the implementation of the Wildlife and Vegetation Monitoring Plan (Section 11.27).
Vegetation	Destruction of grasslands in the vicinity of the Project	KAM acknowledge the importance of grasslands as sensitive ecosystems that support a large number of species. Potential effects of the Project on grasslands and measures to mitigate adverse effects are described in Section 6.10 of the Application/EIS. Grasslands link to numerous other valued components, including most vegetation and wildlife species listed as value components, recreation, and land use. The interrelationships between grasslands and these valued components are discussed in each VC.
Traditional Land Use	Change in access to and use of preferred animal harvesting locations	Potential effects to traditional harvesting activities, including access to harvesting areas, will be assessed in Section 8.4 Land and Resource Use and Chapter 13 Aboriginal Interests (Rights and Title) of the Application/EIS. TK/TLU information provided by SSN in the CHS has been considered and integrated in the assessment and in the design of mitigation strategies. KAM is committed to on-going dialogue with the SSN and other Aboriginal groups to identify specific animal harvesting sites and incorporate this information into the various stages of the Project. The Closure and Reclamation Plan (Section 11.28 of the Application) describes the measures KAM will undertake to rehabilitate habitat during the Closure and Post-Closure phases.

(continued)

Table 4.6-7. Overview of Issues Raised by Aboriginal Groups (continued)

Category	Overview of Issue	KAM Response
Traditional Land Use (cont'd)	Potential effects to plant gathering sites	KAM is committed to on-going dialogue with the SSN and other Aboriginal groups to identify specific harvesting sites and incorporate this information into the various stages of the Project. To date, site specific harvesting locations have not been provided. Potential effects to plant harvesting activities, including access to harvesting areas, will be assessed in Section 8.4 Land and Resource Use and Chapter 13 Aboriginal Interests (Rights and Title) of the Application/EIS. Rare and sensitive ecological communities, Section 6.9 of the Application, will also present the results of the assessment on plant species including some traditional use plants. The Closure and Reclamation Plan (Section 11.28 of the Application) describes the measures KAM will undertake to rehabilitate habitat during the Closure and Post-Closure phases.
	Potential effects on Jacko Lake	Potential effects to Aboriginal Rights and Title, including potential effects on other ceremonial or cultural uses of the land are described in Chapter 13 of the Application/EIS. KAM remains committed to on-going dialogue with the SSN and other Aboriginal groups to understand the specific concerns about potential effects to Jacko Lake. KAM will endeavor to meet with SSN and other Aboriginal groups to discuss and implement, where appropriate any mitigation and/or accommodation strategies.
	Potential effects to Goose Lake	In the current General Arrangement Goose Lake will become part of the TSF. KAM will endeavor to meet with SSN and other Aboriginal groups to discuss and implement, where appropriate any mitigation and/or accommodation strategies.
Aboriginal rights and title	Loss of parts of traditional territory and potential effects to asserted Aboriginal rights and title	Potential effects to rights and title will be discussed in Chapter 13 Aboriginal Interests (Rights and Title) of the Application/EIS. KAM is committed to developing sustainable long-term relationships with SSN and other Aboriginal groups. KAM will work with SSN and other Aboriginal groups to implement long-term economic, social, and environmentally sustainable opportunities while avoiding, minimizing, and mitigating negative Project effects. KAM is actively engaged in on-going dialogue with SSN and other Aboriginal groups aimed at achieving a meaningful and mutually beneficial Project agreement.
	Effects on Aboriginal Economies	KAM proposes to continue to work with the SSN during the EA phases to identify additional information that could be considered in the Application. KAM provided capacity funding during the preliminary phases of the EA both SSN and KAM continue to work towards a capacity agreement for the Application Review phase. The SSN will undertake surveys, focus groups and/or interviews with membership to obtain additional baseline information on Aboriginal Economies and how the Project could interact with this. The information will be used to develop an Aboriginal Economies VC. KAM is also actively working with SSN to support and participate in the SSN Project Assessment Process whereby SSN will undertake its own Aboriginal Economies assessment.

(continued)

Table 4.6-7. Overview of Issues Raised by Aboriginal Groups (continued)

Category	Overview of Issue	KAM Response
Aboriginal rights and title <i>(cont'd)</i>	Potential effects on Governance and the Trout Children Story	<p>KAM proposes to continue to work with the SSN during the EA phases to identify additional information that could be considered in the Application. KAM provided capacity funding during the preliminary phases of the EA both SSN and KAM continue to work towards a capacity agreement for the Application Review phase.</p> <p>The SSN will undertake surveys, focus groups and/or interviews with membership to obtain additional baseline information on perspectives regarding Governance and the Trout Children Story and how the Project could interact with these two factors. The information will be used to develop addenda to the Application on each topic respectively. KAM is also actively working with SSN to support and participate in the SSN Project Assessment Process whereby SSN will undertake its own assessment on Governance and the Trout Children Story.</p>
	Shared Decision Making	<p>The SSN have repeatedly identified the importance of shared decision making with respect to the Project. As part of this, the SSN are undertaking a separate but complimentary Project Assessment Process. KAM is actively working with SSN to support and participate in the SSN Project Assessment Process. This will include information sharing, attendance at the SSN Oral Hearing and other key milestones (identified by SSN), bi-monthly technical meetings and on-going capacity funding.</p>
Heritage resources/sites	Effects to potential heritage resources/sites such as the Hunting Blind Complex (SSN) or potential burial sites/cairns	<p>In the current General Arrangement the Hunting Blind complex will become a part of the open pit. KAM will endeavor to meet with SSN to discuss and implement where appropriate any mitigation and/or accommodation strategies. Heritage sites are assessed in Section 9.1 of the Application/EIS. TK/TLU information provided by SSN has been considered and integrated in the assessment and in the design of mitigation strategies.</p> <p>Potential effects of the Project on sites with ceremonial value to SSN will also be discussed in Chapter 13 of the Application/EIS.</p> <p>Aboriginal and non-Aboriginal Heritage sites are assessed in Section 9.2 of the Application/EIS. TK/TLU information provided by SSN has been considered and integrated in the assessment and in the design of mitigation strategies.</p> <p>Potential effects of the Project on other Aboriginal Interests including heritage values are assessed in Chapter 14 of the Application/EIS.</p>

(continued)

Table 4.6-7. Overview of Issues Raised by Aboriginal Groups (continued)

Category	Overview of Issue	KAM Response
Human Health	<p>Effects to human health from consumption of contaminated country foods</p> <p>Potential effects on human health as a result of changes in air quality</p>	<p>Human Health and Country Foods have been added as VCs in the Application/EIS based on direction received from Health Canada in consultation with the Technical Working Group, and input received from Aboriginal groups and the public.</p> <p>The Human Health assessment (Section 10.4) considers all potential exposure pathways (including, air, drinking water and country foods such as wild meat, vegetation, fish and traditional medicines), for human receptors for Aboriginal and non-Aboriginal people for all age groups and consider sensitive members of the population (young children, the elderly, pregnant women, etc.)</p> <p>Potential effects on country foods, including metal concentrations in plant and animal tissue are assessed in Section 10.3 of the Application/EIS.</p> <p>Effects on wildlife and plants (including invasive plant management and metal uptake by plants) will be monitored throughout the life of the Project through the implementation of the Wildlife/Vegetation Monitoring Plan.</p> <hr/> <p>Residual effects of the Project on air quality and dust deposition have been modelled in accordance with a Dispersion Modelling Plan approved by the BC Ministry of Environment. Modelling results and residual effects will be presented in the Application/EIS. Details of the assessment of air quality will be presented in Section 10.1</p> <p>KAM will implement an Air Quality Monitoring and Dust Control Plan, including measures to mitigate fugitive dust.</p>
Economic opportunities	<p>Interest expressed in training and skills development for members</p> <p>Interest expressed in employment and contracting opportunities</p>	<p>KAM is committed to building a strong and lasting partnership with the SSN and other Aboriginal groups. KAM's goal is to create long-term careers for the SSN and other Aboriginal groups. KAM will endeavor to work closely with the SSN and other Aboriginal groups to develop and implement a First Nation Human Resources development plan for all project phases, which may include gap analysis, member assessment and development programs, high school mentorship programs, etc.</p> <hr/> <p>As stated above KAM will endeavor to work closely with the SSN (and other Aboriginal groups) to develop and implement a First Nation Human Resources development plan for all project phases giving emphasis to First Nation community members to be successfully employed by the Project. KAM has been working with the SSN and other Aboriginal groups developing a procurement management plan. This plan allows Aboriginal companies to successfully compete for contracting opportunities.</p>

(continued)

Table 4.6-7. Overview of Issues Raised by Aboriginal Groups (completed)

Category	Overview of Issue	KAM Response
Accidents and Malfunctions	Concern regarding potential malfunctions and potential failures of the tailings storage facility and the Kinder Morgan Pipeline	The TSF embankment design will be in accordance with the Canadian Dam Association Dam Safety Guidelines. Stability analysis will be completed as part of geotechnical design TSF embankments. This information will be provided as supporting documentation to the Application/EIS. Accidents and Malfunctions will be assessed in Section 17.6 of the Application/EIS and will include scenarios for TSF failure. KAM will implement an Accident and Malfunction Management Plan (including potential effects on the Kinder Morgan pipeline).
Cumulative Effects	Potential cumulative effects resulting from the Project and other industries/developments in the Project area overlapping traditional territory	Chapters 6 to 10 of the Application/EIS will assess the potential environmental, economic, health, social, and heritage effects of the Project. The Application will identify past, present and reasonably foreseeable future projects and activities considered to have the potential to interact with the residual effects of the Project and will assess cumulative effects when appropriate. This assessment will be based on federal and provincial guidance documents.
Consultation	Concerns raised about a lack of capacity to participate in the EA process	KAM recognizes the capacity challenges associated with reviewing large documents associated with EAs. KAM is committed to preparing high quality submissions to facilitate a clear and consistent review of the Project, and to work with government agencies and Aboriginal groups to find ways of supporting an efficient yet effective and comprehensive review process. KAM provided funding to Aboriginal groups to facilitate their involvement in a range of Pre-Application consultations and will continue to offer funding to support SSN participation in the Application/EIS Review period process.

Section 13 (Aboriginal Interests) and Section 14 (Other Potential Effects on Aboriginal Interests) provide detailed discussion of the potential effects on Aboriginal Interests, including those issues raised during consultation. Those sections also propose mitigation, enhancement measures, and accommodation where appropriate.

4.6.2 Consultation during Application/EIS Review

This section summarizes the methods and consultation activities planned for the Application/EIS review period, as discussed in the FNCP, including proposed methods and processes to resolve outstanding issues.

4.6.2.1 Proposed Aboriginal Consultation during Application Review

The consultation activities during the Application/EIS review period will be executed in coordination with BC EAO and CEA Agency. The proposed approach for consultation activities during the Application/EIS review is summarized as follows, with additional details provided in Section 15.5.1:

- **BC EAO/CEA Agency Events.** KAM will continue to participate in meetings and events lead by the BC EAO and CEA Agency, including those associated with the Working Group.

- **Information Sharing:**
 - **Press Release.** KAM will prepare and distribute a press release to local media, as well as purchase newspaper advertisements, radio announcements and/or other methods to announce the acceptance of the Application/EIS for review by the CEA Agency and BC EAO and other activities.
 - **Share Application/EIS.** Digital copies and/or hard copies of the Application/EIS will be made available to Aboriginal Groups (as required by BC EAO and CEA Agency). Hard and digital copies of the Application/EIS will also be provided to the Kamloops and North Kamloops public libraries, as well as to City Hall.
 - **Dedicated Web Platform.** KAM will develop and launch a dedicated web platform additional to its existing website specifically designed to effectively convey the contents of the Application/EIS.
 - **Plain Language Summaries.** KAM will develop plain language summaries of the VC assessments and other high-interest aspects of the Application/EIS.
- **Feedback.** KAM will endeavor to meet with, receive, and address feedback and comments from Aboriginal Groups regarding the effects assessments presented in the Application/EIS. KAM will also endeavor to obtain input regarding measures to avoid or mitigate potential adverse effects and/or otherwise address or accommodate Aboriginal interests that may be adversely affected as presented in the Application/EIS.
- **Information Sessions.** KAM will arrange, facilitate, or participate in public and First Nations presentations, information sessions, or other forums, as directed by BC EAO, the CEA Agency or Aboriginal Groups.
- **Site Tours.** KAM will continue to offer site tours, as appropriate or requested.
- **Technical Meetings.** KAM and SSN have agreed to participate in Technical Meetings to facilitate communication about key EA procedures as well as obtain input on the potential effects on SSN interests and measures to mitigate or accommodate those effects.
- **Chief to Chief meetings-** KAM and SSN leadership (the Chief of TteS and the Chief of SIB) will continue to participate in these meetings.
- **Conduct an assessment on Aboriginal Economies, Governance and the Trout Children Story.** KAM and SSN will both conduct assessments on these topics. KAM will use the preliminary information supplied by SSN (on Day 30) to develop an assessment for Day 60 of the Application Review. SSN will develop its own assessments in accordance with its Project Assessment Process.
- **Participate in the SSN Project Assessment Process.** As requested, KAM will participate in the SSN Project Assessment Process including the Oral Hearing. KAM will make the appropriate representatives available for key milestones during the SSN Assessment Process. Should SSN require the presence of KAM's technical experts, advance notice will be required to avoid scheduling conflicts.

- **First Nation Consultation Report.** As instructed by BC EAO, KAM will provide the SSN with consultation report of the Application review consultation activities. SSN will have an opportunity to review and comment on a draft version of this report for adequate review and comment, and suggested changes will be incorporated and/or tracked. The report will identify issues and concerns raised by the SSN and how these issues and concerns are to be addressed. The report along with the comments received by SSN will be provided to BC EAO on Day 120 of Technical Review.

4.6.2.2 *Process for Resolving Outstanding Issues*

During the Application/EIS review period, KAM will continue to work with Aboriginal Groups to understand potential Project effects and respond to information requests. KAM will endeavour to resolve any outstanding issues through continued dialogue with Aboriginal Groups using the consultation activities identified above. KAM will also continue to seek advice and guidance from the BC EAO and CEA Agency on how to resolve outstanding issues.

KAM will attempt to resolve outstanding issues by:

- obtaining additional details regarding the issue as necessary (from the Aboriginal Group and/or from technical experts with expertise on the issue);
- responding to the Aboriginal Group about the issue that is still outstanding, and checking with the group(s) to determine whether the issue has been sufficiently addressed;
- meeting with the Aboriginal Group as needed to discuss and resolve the issue;
- seeking advice and guidance from BC EAO and CEAA on how to resolve outstanding issues; and
- reporting back to the Aboriginal Group on the status of the issue.

The FNCP also describes an issue resolution process specific to the SSN. KAM is committed to transparency and integrity in all of its business operations, and understands that the Project may affect nearby Aboriginal Groups. Implementing its Design for Closure approach, KAM will work with these communities to develop and implement long-term economic, social, and environmentally sustainable opportunities while avoiding, minimizing, and mitigating adverse Project effects.

4.6.3 **Consultation during Permitting**

Beyond the environmental assessment process, the Project will require a number of provincial permits and federal authorizations (Section 2.8). A Mine Review Committee (MRC) will be established to facilitate the permitting process. KAM will continue to engage with Aboriginal Groups to promote positive and constructive long-term relationships and satisfy the requirements that provincial and federal regulations establish for obtaining permits required for construction and operations. As additional traditional knowledge and traditional land use information becomes available, it will be integrated into the Project permitting activities. Continued dialogue will ensure that benefits to Aboriginal Groups are enhanced and that issues that may arise during the permitting phase are addressed to enhance the Project.

4.7 PUBLIC AND AGENCY INFORMATION DISTRIBUTION AND CONSULTATION

4.7.1 Overview

4.7.1.1 Introduction

This section of the Application/EIS describes the consultation activities undertaken with the public and stakeholders, local government, and government agencies during the pre-Application/pre-EIS stage, covering both the preparation of the AIR/EIS Guidelines and the Application/EIS. The chapter also identifies consultation planned with the public, stakeholders and government agencies during the Application/EIS review (Section 4.7.3). Consultation with regard to First Nations is discussed in Section 4.6 (Aboriginal Information Distribution and Consultation) of this chapter, as well as in Section 15 (Procedural Aspects of Aboriginal Consultation) of the Application/EIS. Other aspects of the assessment process, including a discussion of the technical working group, public comment periods, and open houses, are discussed in Sections 4.1 through 4.5 of this chapter.

Consultation with the public and stakeholders, and government agencies and local government during the pre-Application/EIS stage has followed the direction provided in the section 11 Order ss. 4, 10, 11, 14, 16 and 17) issued by the BC Environmental Assessment Office (BC EAO, 2012) as well as Section 4.4 of the AIR/EIS Guidelines. Public and stakeholder consultation has also followed KAM's May 2012 Community Consultation Plan, which was updated in April 2015 (KAM 2015).

KAM has consulted – and will continue to consult – in a manner consistent with direction provided by the BC EAO (as described in Section 4.1 of this chapter) and CEA Agency (as described in Section 4.2 of this chapter) and the highest standards of community engagement. KAM has adopted consultation practices and employed a variety of mechanisms to:

- provide project information to the community of Kamloops, as well as Knutsford and other neighbouring residents, stakeholders, interest groups, land users, local governments, and provincial and federal government agencies;
- solicit comments on the Project;
- provide timely responses to comments; and
- assist Ajax Project development, planning and operational design.

4.7.1.2 Consultation Objectives

The Proponent recognizes that long-lasting, productive relationships with communities are created through meaningful communication and consultation. The relationships that form as people engage with corporations proposing large-scale projects, such as the Ajax Project, are critical to the development of social licence.

KAM is committed to open and transparent communication with Kamloops residents and other key stakeholders as it develops the Ajax Project. Effective and engaging consultation helps communities and companies learn about each other's needs and aspirations, and ultimately, reach mutually beneficial levels of understanding.

Consultation related to the Project has been informed by several guidance documents, which are described below.

The Canadian Environmental Assessment Agency (CEA Agency), in consultation guidelines published in 2008 (CEAA 2008), identifies consultation and engagement principles. These principles include:

- early notification;
- accessible information;
- shared knowledge;
- sensitivity to community values;
- appropriate levels of participation;
- adaptive processes; and
- transparent results.

Further, the CEA Agency guidelines, which are based on International Association for Public Participation (CEAA 2008) practices, state:

“Meaningful public participation reflects the principles of accessibility, impartiality, transparency, consistency, efficiency, accountability, fairness and timeliness, and recognizes that all parties have responsibilities in meeting these principles. This is an acknowledgment that additional elements may be essential to ensure meaningful public participation. Meaningful will be defined differently by different parties and may vary on a case-by-case basis.”

The proponent is also aware of consultation principles embraced by the BC EAO (BC EAO 2011), expressed as:

“Public consultation during an environmental assessment (EA) contributes to the collection and sharing of information related to the potential environmental, economic, social, heritage and health effects of a proposed project. Consultation is intended to ensure that opportunities exist for the public to understand the proposed project and to have their comments appropriately considered.”

Further, KAM understands that BC EAO has recognized the following consultation objectives (BC EAO 2015):

- to ensure that people who may be affected by a project understand what environmental assessment is and have clear information about the proposed project, to help them participate in the process;
- to ensure that the public consultation program and activities carried out by the EAO and proponents are well designed to listen and respond to the range of perspectives, issues and concerns of the public and stakeholders;
- to gather relevant information, experience and knowledge from the public about a project’s potential adverse effects on communities, and practical measures to address them;

- to provide the government ministers who will make the final decision on whether to approve the project with information about the issues raised by the public, the potential effects on local populations, and how those have been responded to during the environmental assessment; and
- to clearly demonstrate how public input was used during the environmental assessment.

Other guidance documents that have generally informed the proponent's approach to consultation include:

- International Association for Public Participation (IAP2) *Core Values of Public Participation* (IAP2 2015);
- IAP2 *Code of Ethics for Public Participation* (IAP2 2015);
- International Finance Corporation *Stakeholder Engagement: A Good Practice Handbook 2007* (IFC 2007); and
- *Public Participation: Principles and Best Practices for British Columbia*, Office of the Auditor General, November 2008 (BC 2008).

KAM has embraced the principles as outlined and implemented a comprehensive consultation, engagement and communication process designed to provide interested parties with opportunities to become informed and express their views about the Project, including asking questions and seeking answers. The input provided through this process has proved valuable to KAM in the planning of proposed mine operations and mine design.

As well, the proponent has sought to establish metrics, feedback and reporting procedures to the greatest extent possible to monitor, guide and report on the effectiveness of its consultation efforts. KAM will endeavour to show alignment with the above-mentioned principles and objectives through this consultation report.

4.7.1.3 Consultation Requirements

Public consultation requirements for the British Columbia environmental assessment process are set out in the *BC Environmental Assessment Act* (2002) Public Consultation Policy Regulation (B.C. Reg. 373/2002). The regulation sets out requirements for giving public notice, providing public access to information, establishing formal public comment periods, and engaging the public. Specifically, KAM has been mandated by the section 11 Order to consult and report on its consultation efforts.

The Order indicates that KAM is required to:

- provide public notice of key events related to development of the Ajax Project AIR/EIS Guidelines, as well as filing of the Application, open houses and public commenting periods (s. 4);
- develop and implement an approved consultation plan (s. 10.1);
- report on comments and responses received during public comment periods (s. 10.3);

- consult with federal, provincial and local governments on an individual basis (s. 11.1);
- include in its application a summary of public consultation activities and a proposal for consultation through the Application review phase (ss. 14.1.1 and 14.1.2); and
- provide a written report regarding issues and concerns identified during the Application review phase, and how the proponent intends to address them (s.16.3).

As outlined in KAM's Community Consultation Plan (pg.5-6), Section 4.4 of the AIR/EIS Guidelines states that KAM's Application/EIS will provide the following:

- a summary of consultations with public and other key stakeholders, federal, provincial and local government agencies;
- a description of the means of information distribution and consultation used including the following:
 - public meetings and open houses,
 - one-on-one meetings with interested parties,
 - publication of articles in the media, enclosures and community newspapers,
 - interviews on local radio and television,
 - participation in community events; and
- a summary of issues, concerns, and interests identified during the consultations and how these matters were addressed.

As outlined in the consultation plan (pg. 5), KAM understood its consultation obligations, determined by both provincial and federal processes and specified in the section 11 Order and/or AIR/EIS Guidelines, to include:

- creation and implementation of a public consultation plan;
- notification of interested persons, including those likely to be directly affected by Project activities and others that may be affected, including sufficient advance notice of public events related to official commenting periods or other events mandated by BC EAO/CEA Agency;
- provision of mechanisms for two-way communication and meaningful consultation between KAM and the public;
- identification of public perspectives, concerns and opinions about the proposed Project that should be considered in the Application/EIS;
- identification of key issues and the proposed means by which the proponent will deal with issues;
- identification and assessment of potential effects on environmental, economic, social, heritage, and health conditions;
- identification of measures that could be used to avoid, mitigate or otherwise address potential concerns and effects; and

- documentation of public and stakeholders interactions in section 11 Order consultation reports and in the Application/EIS.

As well, as part of the consultation process, BC EAO directed the formation of a Community Advisory Group, which was mandated to, among other things, “provide a forum for meaningful dialogue and input into the environmental assessment of the proposed Ajax Mine project” (BC EAO, 2012). The proponent realized the value of CAG input early in the consultation process and sought to accommodate and enable productive relationships and engagement with the CAG from the outset.

The company recognized, and continues to recognize, the value and importance of meeting its obligations related to public consultation. Informing and involving the community throughout the planning, review and implementation phases of the Ajax Project is paramount to acquiring the social acceptance of the Project that is needed to ensure long-lasting beneficial relationships with stakeholders and the community.

4.7.1.4 *Public Consultation Plan*

KAM’s public consultation plan, required by the section 11 Order, was submitted to the BC EAO in May 2012 and a further update was provided in April 2015 (Appendix 4.7-A). The plans set out the scope of activities for KAM leading to the submission of its Application/EIS, through the Application/EIS review phase and beyond. As noted jointly by the BC EAO and CEA Agency, the approved version of the proponent’s (May 2012) Community Consultation Plan was developed with significant input from the Community Advisory Group and the City of Kamloops.

To the greatest extent possible, commitments to consultation made in KAM’s plans have been fully honoured or implemented. It is important to note that KAM has maintained a flexible, iterative approach to its consultation plans. Rather than rigid adherence to fixed schedules, the proponent has adapted as needed to changing circumstances – most specifically, changes to the Ajax Project General Arrangement (GA) announced in May 2014 (see Section 4.7.2.4) – to provide the public and stakeholders best opportunities to engage with the company.

The April 2015 consultation plan update provided clarity around activities subsequent to KAM’s decision to reconfigure the mine plan. As well, the update provided more detail around the proponent’s intended activities after the Application/EIS submission.

The consultation schedule within the April 2015 update was divided into three distinct components – a pre-Application/EIS phase (which ended May 31, 2015), an Application/EIS review phase, and a post-Application/EIS review phase. Through all consultation phases, KAM’s approach and intent has been, and will continue to be, to build trusting relationships through continuous sharing of information and engagement with the public, local governments, organizations and other groups.

The proponent has adopted a multi-tiered approach to consultation, recognizing that some means of communication and consultation are good at reaching large numbers of people while others are better for personal engagement. This “macro-micro” approach recognizes that consultation methods provide different kinds of experiences for the public and stakeholders; there is not a single method sufficient to provide for the needs of all.

KAM recognizes that consultation with a diverse community such as Kamloops requires communication through varied channels. KAM has, and will continue to, employ a range of consultation and information distribution methods and tools to reach mass audiences as well as individuals.

The proponent's communications tools will continue to evolve as KAM learns more about what works, and the means by which Kamloops residents and stakeholders want and need to be consulted. To date, our communications and consultation "toolbox" has included the following items (all of which will be discussed in greater detail further in this report).

Community Information Sessions

KAM hosted community information sessions to familiarize the public with the Project and the studies underway, build relationships, and to identify issues, concerns and areas where further information needs to be provided to the public. Information sessions also provide opportunities for the public to meet with KAM's technical experts to ask specific questions or gain insight into the studies underway.

Small Group Meetings

KAM hosted numerous small group meetings at locations around Kamloops to address the needs of stakeholders who wanted to engage KAM in a less public setting. Such events were designed to provide opportunity for groups of less than 20 people. The opportunities were advertised through our website and through social media. Such events provided a different atmosphere for attendees than other public events, by creating an environment in which those who are uncomfortable speaking publicly had the opportunity to express their thoughts and opinions.

Meetings with Special Interest Groups

As part of KAM's consultation effort, the proponent met and presented to numerous special interest groups with specific areas of concern, such as the Kamloops Astronomical Society, which worried about potential effects of lighting from the Ajax Project on the night sky. The group maintains a small observatory to the south of the Ajax site. Meetings with astronomers allowed KAM the opportunity to design lighting systems to minimize the potential for light spilling into the night sky. In another instance, KAM also sought input from the Kamloops sport fishing community about ways the proponent might minimize impacts from mine operations at Jacko Lake, as well as potential for habitat offsets. These discussions influenced mine planning and design.

One-on-One Meetings

KAM has met and will continue to meet frequently with individuals. These meetings provide opportunity to present to, or otherwise engage interested stakeholders about the Project, increase awareness about the Project and discuss local interests as well as potential measures to avoid or mitigate potential negative effects.

Site Tours

KAM hosted bus tours of the Ajax Project site (tours are offered up to twice a week depending on weather conditions). The tours introduce and familiarize participants with the mine site and provide information about the Project and its layout. The tours are extensively advertised in newspaper and on radio during the tour season. Typically, tour participants are provided with a Project map and a 60- to 90-minute tour of the Ajax site. A dedicated tour guide explains the Project components, the respective role each plays in the mining process and answers questions as they arise.

Project Website

In 2011, a Project website (with blog component) was developed. The website (www.ajaxmine.ca) presents a range of company and Project information to the public, including facts and history, information about the management team, FAQs, as well as copies of technical reports and presentations such as blasting reports and the feasibility study. The website will continue to be used as a consultation tool during pre-Application/EIS consultation phases as well as during the Application/EIS review phase and beyond. The website is updated as information becomes available.

Three-Dimensional Models

KAM learned through discussions with Kamloops City Council and the public that people wanted visual models to aid understanding about the location and layout of the Project. In response, KAM created a virtual model, a tabletop model, and a three-dimensional flyover video of the proposed mine. The tabletop model is accessible to the public at KAM's Community Relations Centre. The model has also been on display at the Thompson-Nicola Regional District (TNRD) libraries in Kamloops, the Thompson River University common area of the Clocktower Administration Building, and in the foyer of the Kamloops Daily News newspaper, giving people extensive opportunity and easy viewing access. The model is transported to all KAM open houses and other public events. Illustrations of these models can be found at Appendix P.

Digital Models

Virtual models were also created to allow residents the opportunity to explore the proposed Project on their own time, showing Project development, views from different points and progressive reclamation at five and 15 years as well as at the end of mine life. Google Earth was chosen as the base for this model because of its universal availability. A beta version of the model was shown to Kamloops City Council, and the proponent incorporated suggested changes based on councillors' feedback. The link to the three-dimensional "flyover" is available through KAM's website, or directly at <http://www.ajaxmine3d.ca>. Illustrations of these models can be found in Appendix 4.7-P.

Media

KAM used newspaper advertisements and/or information pieces, radio and television announcements to share information about the Project and to encourage members of the public to attend events or provide feedback. As well, KAM has a dedicated media relations team and policy designed to provide members of the news media access to KAM information and managers as necessary.

Social Media

KAM used social media outlets such as Facebook⁴ and PlaceSpeak⁵ (a Vancouver-based company specializing in online consultation forums) to disseminate information about the Project, generate discussion, and identify Project-related concerns. Comments and questions about the Project from people are regularly posted to the Facebook site. The proponent's external affairs team endeavours to respond as soon as possible.

Community Relations Centre (CRC)

In July 2011, KAM opened an office in downtown Kamloops to give Kamloops residents a means to acquire information about the Project, ask questions, and share perspectives and opinions. The centre was staffed by KAM's External Affairs team, which originally comprised a manager, a government relations specialist and a First Nations consultation specialist, a communications specialist and two community ambassadors. Staff responded to questions, and recorded relevant public interactions in a database tracking system. All public information materials have been available through the CRC, as well as access to a 3-D tabletop model showing the proposed Ajax Project. The proponent has committed to maintain a Kamloops office for public outreach, even after operations begin at site.

Mailouts and Other Forms of Mass Communication

KAM produced three publications that were distributed en masse to the Kamloops public. Two publications were distributed through the flyer distribution services of the city's two local newspapers, while one publication was sent directly to more than 30,000 homes by way of Canada Post. Mailouts provided Project information and offered residents points of contact with KAM.

Responding to Public Comments

Mandated by the BC EAO, these periods, aligned to provide input into assessment documents such as the Application for Information Requirements, provided the proponent the opportunity to engage with the public on a wide range of issues related to development of the proposed Ajax Project. The sessions also led to the generation of extensive comment and response tables, which provided record of community concerns and proposed means and methods to mitigate those concerns.

Community Donations

KAM has maintained an extensive community sponsorship and donation program designed to provide benefit to groups, causes, efforts and services that help build the city's social fabric. Many of the donations have been focused towards training and skills development programs, including with schools. For example, the proponent gave funds to several elementary, secondary, and post-secondary programs.

⁴ <https://www.facebook.com/pages/KGHM-Ajax-Mining-Inc/203808973029888>

⁵ <https://www.placespeak.com/topic/855-kghm-international-ajax-project/#!/overview>

The proponent's sponsorship and donation program has created levels of interaction and partnership between KAM and the community that allowed for meaningful dialogue about the Project (a list of community donations made in 2014 can be found in Appendix 4.7-B.)

4.7.2 Pre-Application/EIS Consultation Phase

For the purposes of this section of the report, the pre-Application/EIS consultation phase has been divided into two further periods – an Initial-Engagement period leading to the announcement of a revised mine plan, and the Post-GA announcement period leading to submission of KAM's Application/EIS.

KAM has kept records of its public and stakeholder interactions through the pre-Application/EIS consultation phase, as directed by the section 11 Order and the AIR/EIS Guidelines. The proponent contracted AMEC, a third-party consultant, to provide, oversee and maintain an issues management system to track public interactions related to the EA process. AMEC's Stakeholder Issues and Information Management System (SIIMS) keeps an ongoing record of consultation events and activities, including details such as dates, and issues or questions raised during interactions with the public. SIIMS also identifies stakeholders, profiles and categorizes key interest groups that can be engaged, maintains a record of relevant communications and contact with the stakeholders, as well as actions taken in response to identified issues/concerns.

As well, in addition to the SIIMS database, the proponent has employed the use of Aconex, a Web-based document control system, to help manage documents and interactions with the public. Both systems have worked together to help form the record of contact and consultation this report relies upon. Some records – largely related to confidential landowner engagements – have also been maintained internally by KAM by way of MS Excel tracking tables.

4.7.2.1 Initial Engagement with Community (2011 to May 2014)

The initial engagement phase commenced in 2011, when the Project was introduced to the Kamloops community. This phase of the consultation effort, guided largely by KAM's first public consultation plan accepted by the BC EAO in May 2012, (Appendix 4.7-A), comprised identification of stakeholders, initial outreach and sharing of Project information, establishment of communications tools, communication about the environmental assessment process, and participation in BC EAO-mandated information sessions. This period also included two public comment periods as part of development of the Project's AIR/EIS Guidelines.

Stakeholder Identification

Stakeholders are defined as individuals or groups who have an interest in, or believe they may be impacted by, or be in a position to influence a project, its operations and/or the regulatory permitting process. KAM identified an extensive list of stakeholders who may, or have already, expressed an interest in the Project (Table 4.7-1).

Table 4.7-1. Stakeholders Identified

Local Government	Mayor and Council, City Administrators Thompson Nicola Regional District
Community Residents (Nearest neighbours reside in the communities listed)	Aberdeen (including Pineview Valley) Dufferin Knutsford Sahali Iron Mask
Academic, Non-government, Environmental and Public Organizations	Thompson Rivers University School District 73
Community Focused	Aberdeen Highlands Development Corporation Coalition to Protect East Kamloops Aberdeen Community Association Barnhartvale Community Association Batchelor Heights Community Association Dallas Community Association Downtown/Westend Resident's Society Friends of McDonald Park Heffley Creek Community Recreation Association Juniper Ridge Community Association North Shore Central Community Association Pineview Valley Community Society Sagebrush Neighborhood Association Valleyview Community Association Westside Community Development Society
Economic and Development Focused	Chamber of Commerce Venture Kamloops Kamloops Central Business Association North Shore Business Association Interior Science Innovation Council Interior Technology Innovation Centre Central Interior Home Builders Association Kamloops and District Real Estate Association Tourism Kamloops
Environmentally Focused	Grasslands Conservation Council Ducks Unlimited Lac Le Jeune Conservation Association Kamloops Naturalists Club Kamloops Astronomical Society Thompson Institute of Environmental Studies

(continued)

Table 4.7-1. Stakeholders Identified (completed)

Local Government	Mayor and Council, City Administrators Thompson Nicola Regional District
Ranching, Fish and Wildlife Focused	BC Cattlemen's Association Kamloops & District Fish & Game Association Kamloops Fly Fishers' Association Kamloops Stockmen's Association BC Wildlife Federation (Shuswap Region)
Social and Health Conscious Focused	Lions Clubs (four in Kamloops, several more in surrounding communities) Rotary Club (five in Kamloops, several more in surrounding communities) Kamloops Centre for Seniors Information Interior Health The Overlander Ski Club Greater Kamloops Motorcycle Association Kamloops Physicians for a Healthy Environment (KPHE)
Civic Awareness Focused	Kamloops Area Preservation Association (KAPA) Kamloops Voters Society (KVS)

KAM has made itself available to consult with all stakeholders. As the Project evolves, KAM will continue to consult with additional groups that express interest. The proponent's consultation records provide a summary of interactions with stakeholders (Appendix 4.7-C).

Introducing the Project

The proponent adopted a wide range of tools to distribute initial project information to key audiences and stakeholders, including digital and printed materials provided to people directly or through third-party distribution services (such as newspaper flyer services), a website, as well as in-person meetings and presentations. The company recognized early on the need to provide accurate information about what was proposed as part of the Ajax Project.

The proponent began consulting in Kamloops in March 2011, when company representatives met with individuals and a variety of community groups. The company spoke to several groups, including Rotary and Lions Clubs, Venture Kamloops, the Thompson-Nicola Regional District, the Kamloops & District Fish & Game Association, Kamloops Fly Fishers' Association, the Chamber of Commerce, Kamloops Stockmen's Association, the Kamloops Naturalists Club and the Grasslands Conservation Council, to provide basic project information.

Community Relations Centre – In July 2011, the proponent opened a Community Relations Centre to give the community a place to learn about the project, ask questions and share comments. The office is open between 8:30 a.m. and 4:30 p.m. from Monday to Friday. Drop-in visits have always been encouraged. Advertising in the Kamloops media provided notification of the office's hours. By March 2012, the Community Relations Centre was staffed with seven full-time employees, including an External Affairs Manager who is responsible for leading community, First Nations and government relations. New positions included First Nations and government consultation specialists, a communications specialist, a community relations specialist and a community relations

ambassador, all mandated to share information with the community and provide responses to people's questions and concerns.

Website – The Ajax Project website, www.ajaxmine.ca, was also launched in July 2011. Updated and redesigned in 2013, the website contains extensive project information and is updated as needed with news, events and reports. Early in 2012, the proponent added a “blog” component to the website (full list of blog posts can be found in Appendix 4.7-Q) providing the company with an additional vehicle to share project information. The company also set up info@ajaxmine.ca and encouraged people to write to the company and ask questions. The proponent committed to replying to those emails within two business days.

Site tours – Between July and November 2012, the proponent hosted 61 site tours, designed to provide more information about the project and its layout. In total, KAM provided site tours to 524 Kamloops residents. In 2013, the Project team hosted more than 350 people on site tours, and approximately 650 people in 2014. The schedule of tours and the tour guide's script of the site tour is attached in Appendix 4.7-D.

Printed material / info sheets – KAM has prepared several printed documents about the project that discussed the environment, project history and development, project facts, mining processes, and other relevant issues. In 2011, fact sheets were prepared and made available on the company's website and in its Community Relations Centre. These fact sheets were replaced with an updated fact booklet after the feasibility study was completed. In January 2012, KAM distributed a project fact booklet to Kamloops households as a newspaper insert. In late 2013, a further redesigned and updated booklet was distributed to approximately 30,000 homes by Canada Post. The booklet was also made into a digital PDF and is hosted on KAM's website. The informational materials can be found in Appendix 4.7-E.

Direct Outreach (Meetings with Groups, Public, Stakeholders, etc.)

In keeping with the “micro-macro” approach to consultation, KAM has met with groups both large and small, in locations as varied as the Grand Hall at Thompson Rivers University to church community lunchrooms.

Open houses / public workshops – Since the Project was introduced in 2011, KAM has organized, participated in, documented and responded to public input from a series of community information sessions, workshops and public comment period open houses (Table 4.7-2). Each of the sessions was designed to convey different aspects of Project information to the public and stakeholders, and to solicit feedback and comments.

Table 4.7-2. Public Consultation / Engagement Sessions

Date	Method	Topics	Notifications Ads (Appendix 4.7-K)
June 6, 2011	One-day public open house, led by government.	Initial comments on the Project description	Multiple ads, via radio, newspaper, 7 to 21 days in advance
February 6-7, 2012	Two-day information session at the Coast Canadian Inn, Kamloops. Nearly 1,100 people participated.	Draft AIR/EIS Guidelines	Multiple ads, via radio, newspaper, 7 to 21 days in advance
April 18, 2012	Workshop: Proposed Ajax Mining Process. 118 people attended.	KAM facilitated a workshop at Thompson Rivers University on the mining process. KAM provided presentations to the group and offered a Q&A period.	Multiple ads, via radio, newspaper, 7 to 21 days in advance
May 30, 2012	Workshop: Proposed Ajax Mining Process. 44 people attended.	KAM facilitated a workshop at Thompson Rivers University on the mining process. KAM provided presentations and offered a Q&A period.	Multiple ads, via radio, newspaper, 7 to 21 days in advance
June 13, 2012	Workshop: Environmental Assessment Study Update. 72 people attended.	KAM collected 30 forms completed by the participants.	Multiple ads, via radio, newspaper, 7 to 21 days in advance
June 28, 2012	Workshop: Environmental Assessment Study Update. 64 people attended.	Included a presentation on the EA studies being conducted for the Project. Comment sheets were collected to record issues, comments and suggestions.	Multiple ads, via radio, newspaper, 7 to 21 days in advance
January 15-16, 2013	Two-day open house at the Coast Hotel and Convention Centre. Nearly 600 people attended the open house.	Introduced KGHMI and staff, Project update, Project description	Multiple ads, via radio, newspaper, 7 to 21 days in advance
September 9-12, 2013	KAM facilitated four workshops at Thompson Rivers University in Kamloops over four days. Approximately 50 people attended each event (200 in total).	Water Quality Air Quality Noise and Vibration Human Health and Ecological Risk Assessment (HHERA)	Multiple ads, via radio, newspaper, 7 to 21 days in advance
June 24-26, 2014	KAM hosted three open at the Coast Canadian Conference Centre and at the Knutsford Community Hall. Approximately 200 people attended each day.	Information sharing and feedback regarding the new GA.	Multiple ads, via radio, newspaper, 7 to 21 days in advance

(continued)

Table 4.7-2. Public Consultation / Engagement Sessions (completed)

Date	Method	Topics	Notifications Ads (Appendix 4.7-K)
November 24-25, 2014	Two open houses were arranged by the BC EAO and CEA Agency and facilitated by KAM to share information and gather public input about the AIR/EIS Guidelines in relation to the new GA. Nearly 900 people attended these events. In addition, BC EAO and the CEA Agency hosted three Environmental Assessment 101 workshops per day.	Comments/feedback sought in relation to the AIR/EIS Guidelines and the new GA.	Multiple ads, via radio, newspaper, 7 to 21 days in advance

Part C, section 4 of the section 11 Order (pursuant to the Public Consultation Policy Regulation [B.C. Reg. 373/02]) identifies timelines for providing notice for formal public comment periods and open houses. The proponent has adopted similar timelines to provide public notice for its large public consultation events, including those held but not mandated by the BC EAO. In all instances, KAM provided public notification of events through advertising between 7 and 21 days in advance in *Kamloops This Week* and *The Daily News* newspapers as well as on local radio stations (Appendix 4.7-K).

In June 2011, the proponent participated in government-led public information sessions to gather initial comments on the Project Description. In February 2012, the company and its consultants participated in a two-day information session with attendance of nearly 1,100 people, answering questions and talking to the public about the Project, specifically focused on the adequacy of the draft Application Information Requirements / EIS Guidelines.

In April, May and June 2012, KAM hosted four workshops for the public at Thompson Rivers University. Participants, including representatives from community groups (including the Aberdeen Community Association, City of Kamloops, Grasslands Conservation Council, Kamloops Area Preservation Association, Kamloops Daily News, Kamloops Naturalist Club, Kamloops Stockmen's Association, Community Advisory Group (CAG), and the Lac Le Jeune Conversation Association). Participants raised concerns about the Ajax Project and the proposed mine's proximity to the City of Kamloops. Discussions were also held about environmental issues, health impacts, noise and vibration, visual impact, tailings and waste rock, and the impact of the mine on the value of properties nearby. Environmental issues discussed between the audience and experts included concerns about water usage and quality, air quality and airborne particulate, effects on wildlife and fisheries, changes to the topography of the land and the effects of those changes, soil stability, and chemicals released during mine processes. Socio-economic issues related to jobs and accountability were also raised.

In January 2013, KAM held a two-day open house with the purpose of introducing the company to the community of Kamloops, and to provide people with an opportunity to meet both management and employees from other KGHM operations. Nearly 600 people attended the event. The open

session provided attendees the opportunity to walk around and stop at booths and tables, each presenting different kinds of information. Corporate practices and philosophies were discussed, especially in relation to KGHM operations in other parts of the world.

In September 2013, KAM hosted four open house events at Thompson Rivers University. The sessions, each four hours long and on different days and times, saw KAM consultants and subject-matter experts present to audiences about their respective fields of expertise. The five areas discussed were:

- Water Quality;
- Air Quality;
- Noise and Vibration;
- Human Health and Ecological Risk Assessment (HHERA); and
- Blasting.

Each of the presentations was approximately 45 minutes long, and was followed by an open-mike Q&A session during which members of the audience had the opportunity to ask questions. The consultants – or when appropriate the Proponent – responded to the questions. The presentations and Q&A sessions were captured in entirety on video. The videos were posted online to allow people who could not attend to see the information. The videos remain online and are available on YouTube and Vimeo and links to those presentations were placed on KAM's website. To date, the videos have been viewed almost 360 times⁶. Written summaries of the presentations, as well as transcripts of Q&A sessions, were also created and placed on KAM's website at www.ajaxmine.ca (the written summaries are available in Appendix 4.7-F).

Each session of the four-day event was set to allow for the attendance of 350 people. The sessions were held at different times in the afternoon and evenings to allow for people on varied schedules to attend. Approximately 50 people attended each of the sessions, for a total of about 200 people. Media was also invited to attend the sessions, and a special pre-event session was held to allow reporters special access to the consultants, so reporters could ask questions about and discuss the content of the presentations.

In June 2014, KAM hosted three open houses to convey information and solicit feedback about its revised mine plan (see Section 4.7.2.4). Nearly 600 people attended the events, held at the Coast Canadian Conference Centre and at the Knutsford Community Hall.

In November 2014, KAM facilitated two open houses mandated by the BC EAO and CEA Agency in relation to a public commenting period established to solicit feedback and comments in regard to the AIR/EIS Guidelines and the Ajax Project's revised GA (see Section 4.7.2.4). More than 900 people attended the event, generating almost 700 comments about the Project, including a dedicated questions/issues document from the Community Advisory Group. As per requirements in the

⁶ https://www.youtube.com/channel/UC_51Z8dKv1IPfyEzriWCbig

section 11 Order, KAM responded to those comments; those response documents were submitted to the BC EAO and posted to ePIC⁷ (copies are attached at Appendix 4.7-G).

Small group meetings – While the large, open public sessions provided value, a need was also identified for smaller sessions in which people might feel more at ease or less apprehensive to express opinions. KAM realized some in Kamloops wanted the opportunity to meet and learn of the Project in the absence of large groups or news media.

Starting in October 2013, KAM began an extensive outreach into the Kamloops community to encourage small-group engagement. The company procured the services of a consultant who provided telephone outreach capability. To begin, more than 4,000 people in Aberdeen and Pineview Valley – the city neighbourhoods in closest proximity to proposed mine operations – were directly contacted by telephone and invited to attend small-group information sessions. KAM created a PowerPoint multimedia presentation and presented to groups as requested. Six sessions were booked and presentations made as a result of this initial effort (Appendix 4.7-H).

Further telephone and advertising outreach efforts continued, and general invitations were made to the community at large through advertising, social media and website postings. Through 2014, KAM met with six more groups in similar small-group sessions. KAM attended and made presentations for each and every invitation received.

Outreach by Other Means (Media, Social Media, PlaceSpeak)

In addition to direct outreach and information sharing by way of distributed printed materials, KAM engaged in an effort to reach Kamloops stakeholders by way of the community's news media, social media and other digital means. It was recognized that public audiences today are diverse and complex, and that various means needed to be employed to ensure all opportunities were engaged to provide basic information about the Project, or to provide information about opportunities to engage the company.

The proponent has used newspaper, television and radio interviews, as well as purchased advertisements in all traditional media outlets, to inform the public about news and events related to the Project. KAM has a media relations policy that encourages local reporters to call and ask questions about issues pertaining to the Project. A KAM spokesperson endeavours to provide answers in timely fashion and to meet the deadline needs of the media outlet in question. KAM has provided many media interviews since 2011, on a wide variety of topics (a list of media articles, stories, and interviews is included in Appendix 4.7-I).

In addition to traditional media, KAM has taken advantage of the outreach potential of social media, including email and Facebook. Social media has capacity to reach people in ways that traditional media do not. E-mails and Facebook posts, for example, have been used to notify the public about the release of news or updates, as well as to invite individuals and groups to attend events or to provide feedback on information made available.

⁷ http://a100.gov.bc.ca/appsdata/epic/html/deploy/epic_project_doc_list_362_p_pro.html

Another digital consultation channel adopted by the proponent was PlaceSpeak (www.PlaceSpeak.com/ajaxproject), a proprietary web platform created by a Vancouver-based company. The platform was created specifically to enable consultation, and used geographic targeting and participant registration as a way to create a responsible online commenting and consultation platform for people who live in affected areas.

KAM established residence inside City of Kamloops boundaries as a prerequisite for participation in PlaceSpeak's Ajax Project forum. It was hoped this unique, geographically restricted system would provide Kamloops residents a meaningful option for feedback and engagement. The platform was advertised heavily by KAM in both traditional and social media. Unfortunately, the platform failed to attract a significant numbers of users, and did not develop a meaningful audience. Despite that, KAM has maintained the platform and monitors it regularly, to ensure those who felt it useful will continue to be served.

Knutsford Landowner Engagement

Early on, the proponent recognized the unique character of a small group of stakeholders – Knutsford-area landowners in immediate proximity to proposed mine operations.

The proposed Ajax Project mine site is largely surrounded by privately owned lands traditionally used for cattle ranching. Many farms and ranches, some of them operated by families with historic ties to the earliest days of Kamloops, remain active in the area. KAM began an outreach effort to connect with the approximately 50 property owners in the Knutsford area to discuss with them the proposed mine plan, as well as to mitigate to the greatest extent possible the impacts related to site work necessary to advance the project.

Many components of mine planning and environmental assessment studies required work to be done in areas of the mine bordering private properties. Groundwater testing and condemnation drilling are two examples. KAM consulted with landowners regularly, both to notify landowners of pending work as well as to learn of ways that impacts could be lessened or eliminated.

With regard to drilling, the placement of drill pads was, when possible, altered to prevent light and noise from working rigs from affecting people and animals. Drilling schedules were developed to take advantage of periods when people may not have been home. In other instances, test pits were moved from some areas to others to protect important fields from disturbance and preserve their value as hay production areas.

KAM also consulted extensively with landowners by direct mail letter and telephone about a proposed low-level magnetic aerial survey of its property in March 2014. The flights, conducted by a third-party consultant, required a helicopter to fly parallel lines at an altitude of approximately 100 metres. A record of engagement is found in Appendix J.

Initially, landowners expressed concern about the timing of the flights, as they were scheduled to happen at the peak of calving season, a time when pregnant cows become exceptionally skittish to disturbance. As a result of those concerns, KAM delayed the aeromagnetic survey by more than six weeks to allow the calving season to conclude. As well, the company agreed to fly only between the

hours of 8 a.m. and 5 p.m. weekdays only, to limit potential disturbances to people. Letters notifying of the flights were hand-delivered to area landowners.

KAM has also done the following with respect to landowners:

- directly called key landowners to inform them of the new mine arrangement and changes;
- made direct visits to landowner homes and properties to discuss issues, concerns, future plans. These were done as needed, based on contact between landowners and KAM;
- hosted special social events or open houses in Knutsford to engage KAM management with landowners;
- hosted a ranching event held at a KAM-owned property in Knutsford to discuss ranching concerns;
- appointed a “point person” to enable a consistent point-of-contact for Knutsford landowners. The proponent’s employee worked hard to create personal relationships with landowners to allow for honest exchanges of information;
- held one-on-one meetings with landowners and KAM management regarding concerns.

As well, KAM hosted an open house session at the Knutsford Community Hall on June 26, 2014, for Knutsford residents to discuss and seek feedback and comments regarding the revised GA (see Section 4.7.2.4).

4.7.2.2 *Pre-Application/EIS Consultation with Government Agencies and Local Governments*

In addition to the public consultation activities described above, KAM has also actively participated in engagement processes with governments as required by the section 11 Order. This section reports KAM’s consultation activities conducted as part of those official processes, as well as its consultation intentions and activities with governments and agencies.

Although regulatory engagement had been ongoing since the beginning of the EA process in 2011, the proponent undertook a strategic review of its program after acceptance of operational responsibility for the Ajax Project in September 2012, which followed KGHM’s increase in project ownership.

KAM embarked on an initiative to ensure appropriate levels of engagement, information sharing and consultation with federal, provincial, municipal and First Nations levels of government. The proponent hired a government relations specialist to develop a robust engagement strategy and provide a single, reliable point of contact between governments and KAM.

KAM committed to maintaining strong professional relationships with all regulatory and government agencies. The proponent continues to coordinate all site and operational activities in accordance with approved permits and maintains a good working relationship with relevant provincial agencies to ensure operational compliance.

Community Advisory Group

In early 2012, BC EAO established a Community Advisory Group (CAG) for the Project. Terms of reference and operating procedures were developed at a CAG meeting on February 2, 2012. Groups participating in the CAG include:

- Aberdeen Community Association;
- Aberdeen Highlands Development Corporation;
- BC Cattlemen's Association;
- Coalition to Protect East Kamloops;
- Ducks Unlimited;
- Grasslands Conservation Council of British Columbia;
- Kamloops Area Preservation Association (KAPA);
- Kamloops Astronomical Society;
- Kamloops & District Fish & Game Association;
- Kamloops Fly Fishers' Association;
- Kamloops Naturalist Club;
- Kamloops Stockmen's Association;
- Lac Le Jeune Conservation Association;
- Pineview Community Group;
- Thompson Institute of Environmental Studies;
- Thompson Watershed Coalition;
- Coalition for the Preservation of East Kamloops;
- Pineview Community Group;
- Kamloops Exploration Group (KEG);
- Kamloops Physicians for a Healthy Environment; and
- TRU Faculty Association, Human Rights Committee.

Following the initial CAG meeting, the CAG met four times in 2012 – February 27, 2012, March 28, 2012, April 19, 2012, and October 1, 2012. These meetings, which KAM did not usually participate in, were held to develop and finalize the terms of reference and operating procedures for the CAG and to review and finalize input from the CAG on the draft AIR/EIS Guidelines. In addition, KAM was asked to coordinate and present a CAG meeting on the changes to the project in October 2014. Following a morning of proponent-lead presentations (project changes and proposed changes to the AIR/EISG) and an extended question and answer period, KAM, CAG attendees and members from the BC EAO and CEA Agency participated in a tour of the Project's proposed site.

Ajax Project Working Group

BC EAO established the Ajax Project Working Group in spring of 2011. The Working Group is comprised of representatives from many federal, provincial, municipal and First Nations agencies, including:

- City of Kamloops;
- SSN;
- TNRD;
- Health Canada;
- Interior Health;
- Ministry of Energy and Mines,
- Ministry of Transportation;
- Ministry of Environment
- Ministry of Forests, Lands and Natural Resource Operations;
- Transport Canada;
- Fisheries and Oceans Canada;
- Natural Resources Canada;
- Environment Canada;
- Lower Nicola Indian Band; and
- Whispering Pines Indian Band.

Since inception, Working Group meetings have taken place on April 27, 2011, October 27, 2011, and June 23, 2014. The first meeting was at the Kamloops Convention Centre, the second at the Kamloops Courthouse, and the third at the Coast Hotel Convention Centre, which also included a site visit. Topics discussed at these meetings, which KAM, BC EAO, and the CEA Agency participated in, included:

- overview of the provincial and federal environmental assessment processes;
- overview of the Project description;
- aboriginal groups consultation;
- update on field work and proposed 2011 field studies;
- preliminary issues identification;
- overview of the draft AIR/EIS guidelines;
- presentation of the redesigned Ajax Project GA; and
- overview of the revised AIR/EIS guidelines based on the new GA and project design updates.

Following the initial Working Group meetings technical sub-working groups were established; including for water quality, air quality and health. The sub-working group meetings have taken place on January 24, 2012, February 27, 2012, May 10, 2012, and May 16, 2012. KAM participated in these meetings as required to provide information or respond to comments and questions.

The proponent has paid particular attention to the requirements for information of the Working Group to ensure members were properly and fully informed about the Project in a timely way. The proponent adopted an engagement philosophy with the Working Group that dictated engagement “early and often.” KAM coordinated regular meetings with Working Group members, government staff (including ministerial personnel) and key Project managers, experts, consultants and workers to ensure a continuous flow of Project-related information.

In mid-2014, KAM began a technical engagement program designed to ensure that key components of the Application/EIS were being evaluated, assessed and reported in accordance with the Working Group preferences. The proponent informed the Working Group about its baseline collection and research approaches, methodologies, modelling plans and expected deliverables to allow the Working Group the opportunity to offer feedback. The timing of these meetings provided KAM with the ability to adapt assessment programs. Many additions and revisions to assessment programs were made as a result of these meetings. KAM hosted and coordinated such Working Group meetings on a variety of key topics and study areas, including:

- Fish and Aquatics;
- Water (Quality, Quantity, Balance);
- Air Quality;
- HHERA;
- Traffic Impact Assessment;
- Noise and Vibration;
- Socio-Economics Impact Assessment; and
- Visual Impact Assessment.

Lastly, KAM made presentations to the Working Group in advance of submission of the Application/EIS to provide an overarching pre-screening of the document. The meetings were held over three days starting July 7, 2015. The first day saw attendees provided an overview of the Application/EIS, the Project description, Project alternatives, as well as details from reports examining geochemistry, water and fish aquatics. Day Two provided more detailed information to sub-Working Group committees on health and social VCs, as well as water and fish and aquatic VCs. The final day of the workshops discussed environmental VCs, as well as provided information about heritage and Part C (Aboriginal Groups Information Requirements) sections.

Public Comment Periods (PCP)

There have been three EAO/CEA Agency-mandated opportunities for the public to comment on the record about the proposed Ajax Project. The events were advertised to the public through local media outlets, including newspapers and radio, as well as through social media channels, in accordance with s.4 of the section 11 Order. BC EAO approved notices were published between for a minimum of seven days and as many as 21 days before the events, notifying people about the times, days and locations of the events. The notices also outlined the purpose of the event, and provided links to more information. An example of such a notice as well as a complete schedule of advertisements place in newspapers and radios related to public events can be found in Appendix 4.7-K.

The first PCP took place from June 8, 2011, to July 11, 2011, (30 days) and sought comments from the public on the proposed Project and its potential effects to ensure that these issues are identified for consideration in the environmental assessment. On June 16, 2011, KAM was invited by BC EAO to participate in a BC EAO-led public information session intended to provide information and answer questions about the EA process, as well as to gather feedback and comments on the Project description.

From January 11, 2012, to March 12, 2012, (60 days) the public was provided with an opportunity to review and provide input on the proposed Project's draft AIR/EIS Guidelines. Information sessions were held on February 6 and 7, 2012, at the Kamloops Towne Lodge, to explain the purpose and content of the draft AIR/EIS Guidelines and to seek written input from the public on whether the proposed studies, methods and information required satisfied the public's interests and concerns.

The following documents pertaining to the AIR/EIS Guidelines and this commenting period were posted to the CEA Agency and/or the BC EAO websites (attached in Appendix 4.7-G):

- a Summary of Public Comments and Proponent Responses document, dated April 2015, 2015, providing an overview of key issues noted in public comments received in an official comment period in November 2014, and a summary of the proponent's responses to key issues;
- a Summary of Community Advisory Group Comments and Proponent Responses document, dated March 30, 2015, providing an overview of key issues noted in comments received from the CAG in an official comment period in November 2014, and a summary of the proponent's responses to key issues;
- a summary of public comments received in an official comment period in November 2014;
- a Summary of Public Comments and Proponent Responses document, dated May 22, 2012, providing an overview of key issues noted in the public comments received, and a summary of the proponent's responses to key issues;
- all public comments submitted as part of the February-March 2012 public comment period;
- an Agency Issues/Comment Tracking Table documenting key issues identified by the Working Group (including federal, provincial, and local government agencies, as well as First Nations; and

- a Public Comment Tracking Table documenting key issues identified by the public, organized by project component and Valued Component (VC), and the proponent's responses.

In November 2014, the BC EAO/CEA Agency announced a third PCP for the Project's revised AIR/EIS Guidelines. Two open houses were arranged by the BC EAO/CEA Agency to share information and gather public input. A range of Project-related information across a wide variety of topics was offered (as demonstrated in Appendix 4.7-L). Nearly 900 people attended these events. In addition, BC EAO and the CEA Agency hosted three Environmental Assessment 101 workshops per day.

Notification of the public for all public comment periods was done by way of extensive advertising in local media. A complete list of advertisements by media outlet is attached in Appendix 4.7-K.

Following the end of the comment period, KAM tracked comments and prepared responses as mandated. The response document was submitted to the BC EAO, approved, and posted on its ePIC⁸ website (attached in Appendix 4.7-G).

Issues and concerns identified in the public comment periods led to extensive consultation on the scope of a number of VCs.

4.7.2.3 *Key Issues / Concerns Raised in Pre-Application Pre-EIS Phase*

Through many months of consultation, the proponent has learned of public issues and concerns related to development of the proposed Ajax Project. Comments have come both directly and indirectly from government, First Nations, the Project Working Group, the Community Advisory Group, other stakeholders and the general public. KAM has listened to and responded to hundreds of comments about the Project.

Many comments have been made during the course of BC EAO/CEA Agency public commenting periods. Others have come to KAM during the course of its consultation program, or through interactions with the Community Advisory Group or Project Working Group. To the greatest extent possible, comments have been recorded and entered into the SIIMS or Aconex database to allow issues to be tracked over time. Issues tracking tables are included in Appendix 4.7-M.

KAM notes that issues and concerns have been raised across an extremely wide spectrum of subjects encompassing most conceivable aspects of life and living in and around Kamloops. The passage of time, however, has clarified the issues into identifiable themes that show many people share similar concerns related to development of the Project.

The proponent has taken all concerns seriously, no matter how many or few have expressed a given point of view. KAM has endeavoured to provide consistent responses about issues acknowledging, however, that as the parameters of the Project have changed, in some instances so have responses. As well, KAM has worked to incorporate comments and concerns into mine design and planning processes, to ensure that issues are dealt with substantively.

⁸ http://a100.gov.bc.ca/appsdata/epic/html/deploy/epic_project_doc_list_362_p_pro.html

Dominant Themes / Summary of Responses

While comments and concerns about the Project have covered a wide range of topics, several key themes have emerged across time. The following descriptions or discussion of these themes do not represent the full range of comments KAM has seen or heard in the pre-Application/EIS consultation phase, but they do represent a summary of the most common comments.

Typically, comments or concerns can be tied to specific VCs, and further assigned to five Assessment Categories in the AIR/EIS Guidelines that encompass all of the VCs. In some instances, comments could not be matched to a VC or Assessment Category, especially those tied to concerns about mining or mine infrastructure. Such comments will be discussed under the theme “Project Related.” The five Assessment Categories defined in the AIR/EIS Guidelines encompassing all VCs are Health, Heritage, Social, Economic and Environment.

The majority of issues, comments and concerns heard or seen by KAM in the pre-Application/EIS consultation phase are associated with the Health, Economic and Environment Assessment Categories but span a wide range of VCs, including Air Quality, Water Quality, Human Health, Community Wellbeing, Noise and Vibration and Labour Force and Training.

KAM has worked to reply to comments specifically when possible, especially those submitted in the course of BC EAO/CEA Agency public comment periods. Tables were developed showing comment-specific replies developed in relation to questions or comments posed by the public in official comment periods, as well as questions and issues posed by the CAG and the Project Working Group (Comment/response tables can be found in Appendix 4.7-G).

To the greatest extent possible, KAM believes it has answered or addressed questions, comments or issues posed in the pre-Application/EIS consultation phase. KAM’s responses have often emphasized some or all aspects of the following:

- KAM has retained qualified, experienced, and suitably accredited specialists to complete the Application/EIS;
- the Application/EIS will include detailed effects assessment for each VC;
- KAM will develop and implement an Environmental Management System for the Project;
- a preliminary list of anticipated compliance monitoring obligations associated with permits and licenses issued by local, provincial and federal governments;
- environmental awareness training programs that will be implemented for all personnel and contractors; and
- training and professional development programs for Project employees and contractors.

KAM’s responses, generally, have also noted:

- results of baseline studies will be included in the Application/EIS;
- the Project will be designed and operated to meet applicable regulatory requirements;

- KAM will meet or exceed monitoring and maintenance required by the Ministry of Energy and Mines, including the Tailing Storage Facility;
- geotechnical investigations, engineering and other testing will be completed to ensure Project infrastructure can be safely built on sites selected;
- Project infrastructure will be designed and maintained in accordance with applicable engineering standards; and
- adaptive management will be employed and KAM will adjust its approach to management and monitoring as may be needed.

The following represent more specific discussion and thematic responses given by KAM across the range of dominant themes, VCs or Assessment Categories, and generally summarize the complete list of detailed responses outlined in the comprehensive tracking tables.

Air Quality

Concerns about the Ajax Project's potential impact on Kamloops's air quality have been longstanding. Air quality has been the category drawing the most public comments. There have been concerns expressed about the mine negatively contributing to the air quality of the area, as well as public commentary that Kamloops already has periods of bad air quality, with other industries and natural events such as wildfires and dust storms contributing to the conditions. There have also been concerns about the geography of the valley, prevailing winds and blowing dust. The proximity of the proposed mine and the potential effects on air quality have been raised repeatedly. Air quality concerns have largely focused on dust, emissions, and the potential for airborne distribution of harmful metals and other contaminants.

Air Quality VC concerns typically oriented around:

- rock/mineral constituents, carbon emissions, and dust (especially PM_{2.5}) that could contribute to poor air quality;
- objective measures and assessment of effects;
- sufficiency of studies, modelling, and monitoring stations;
- cumulative and meteorological effects on air quality;
- details of air quality management methods and monitoring;
- health care costs; and
- post-closure air quality.

KAM has generally responded with the following information:

- KAM has changed the GA and will implement further measures to address dust-related soil contamination concerns;

- dust will be minimized by:
 - covering crushed ore stock piles and conveyors,
 - paving the main access road, and
 - employing best-available dust suppressant technology, including watering and organic binding agents, vacuum collection systems, and covered structures;
- emissions will be minimized by:
 - reducing haul distances as a result of condensed footprint,
 - using the latest in EPA-approved diesel engine technology.

KAM has also emphasized that:

- The Application/EIS will include an assessment of potential effects on air quality. The assessment will take into account potential cumulative effects.
- Modelling will take into account varying atmospheric conditions, prevailing winds, and proximity to the City of Kamloops.
- Measures to minimize or avoid adverse effects on air quality will be included in the Application/EIS in an Air Quality Management and Monitoring Plan.
- The base case modelling considers existing land based transportation emissions sources and existing non-point sources within the Kamloops airshed.
- Industrial emissions, including those of existing sources, are considered in the dispersion modelling assessment.
- The Application/EIS will include a Reclamation and Closure Management Plan. This plan will be implemented should the Project be approved and proceed.
- Effects assessments will consider linkages between effects related to one VC and potential for effects on other VCs (e.g., air quality effects on country foods or surface water).
- Cumulative effects will be included in the effects assessment.
- A three-dimensional CALMET wind field will be used to drive the CALPUFF model. The CALMET data are based on surface measurements at four locations in the airshed, plus appropriate upper air data and prognostic meteorological data and was developed by the Ministry.
- Project-specific meteorology stations have been established, and data collection is on-going. Results from these stations will be augmented with long-term regional data to derive appropriate estimates of weather conditions.
- KAM will be required to meet emission and other requirements related to air quality in the waste discharge permit issued by the BC Ministry of Environment (BC MOE).
- KAM will implement the air quality monitoring and reporting program.

Human Health

Given the complex array of factors that can affect health, community health and well-being, this VC has linkages to other VCs, including Air Quality, Water Quality, Country Foods, and Noise and Vibration. The proximity of the mine to the City of Kamloops clearly has been a concern for many people and groups. The public has commented at length on the importance and need for good quality air, water, and foods. Many people also expressed a desire to maintain their health and healthy lifestyles and to live in quiet settings. Comments were raised about the need for more comprehensive health studies, modeling and information, and the need to consider health implications and costs.

Others have expressed concern for human health and worry that potential effects from the Ajax Project could lead to poorer health or even early mortality for vulnerable populations in the community, including the elderly, pregnant women, young children or people with asthma or other breathing difficulties.

KAM has generally responded with the following:

- The Application/EIS will contain numerous studies that speak to health concerns and issues, including a Human Health Ecological Risk Assessment (HHERA). This assessment will incorporate potential effects on air quality (including metals and particulates), water quality, and country foods. Sensitive receptors, which include groups considered particularly sensitive to environmental changes, are considered in the analysis. The HHERA, in combination with other VCs including socially focussed VCs, provides an extremely comprehensive analysis of all relevant factors related to human health and the potential effects of the Ajax Project. Potentially adverse effects on human health will be assessed and described in the Application/EIS.
- A Human Health VC was added to the Health pillar, which already had a number of other VCs related to health, including Air Quality, Country Foods, Community Health and Well-being. KAM will assess social aspects of health in other VCs within the Health and Social pillars.
- Other VCs, including the Greenhouse Gases, Air, Surface and Groundwater Quality VCs, as well as the Community Health and Well-being VCs, will help inform the health-related studies to ensure they are complete and comprehensive.

Water Quality and Quantity

Comments on water quality have generally focused on how to ensure water quality is protected during mine operations. Concerns have been linked to human health, general well-being and quality of life, and to the need for protection of water quality and quantity to sustain sockeye salmon and trout in the Thompson River watersheds as well as stocked rainbow trout in Jacko Lake.

Surface Water Quality VC concerns focused on the need for water quality research, assessing potential effects on water quality, and protecting water quality.

KAM has responded with the following:

- The company will implement measures to address water concerns, including:
 - designing the Project to maintain a negative water balance,
 - designing a robust surface water collection and management system for the site,
 - recycling water to the greatest extent possible, and
 - relocating the TSF out of the Alkali Creek watershed (including Cherry Creek).

Environment / Environmental Appreciation

The proponent recognizes and appreciates that residents and tourists are concerned for the future of local grasslands, lakes, and rivers, particularly those in and around the proposed Ajax Project site.

Public comments show that many residents and tourists value the scenery to be found in the local ranges, forests and grasslands and spend time there hunting, fishing and participating in other recreational activities. Jacko Lake figures prominently in relation to fishing and wildlife viewing. Peterson Creek and Peterson Creek Park also provide important recreational opportunities, including hiking and biking.

People have commented that they live in Kamloops or moved to Kamloops to have greater access to the outdoors and outdoor experiences. The diversity of wildlife and wild spaces and the number and quality of fishing lakes and rivers are key elements of the outdoor experience. Members of the public noted they appreciate the area's arid climate, clean air and quality surface and groundwater resources. These resources are also important to deer, moose, birds, fish, and other terrestrial and aquatic species.

Public concerns often related to the potential for lost or compromised recreational opportunities, primarily those associated with Jacko Lake, Inks Lake, Goose Lake, and Goose Lake road.

Jacko Lake has been identified as an important outdoor recreation location. Activities include fishing from shore and boat, and wildlife and bird watching. It is also a source of irrigation water for downstream water licence holders and contributes to flows in Peterson Creek.

The following generally indicates how KAM has responded to comments related to the Environmental Assessment Category and component VCs:

- An assessment of potential effects on grasslands, lakes, rivers, mammals, birds and reptiles, fish and fish habitat and amphibians will be included in the Application/EIS. Many of these areas interrelate with other Valued Components. The interrelationships will also be discussed. Potential adverse effects on land and resource use and outdoor recreation activities associated with these issues will be assessed.

- In addition to terrestrial habitat mapping (which classifies the grassland communities), grassland priority mapping from the Grasslands Conservation Council of BC will also be considered when determining effects to grasslands. Grassland priority mapping considers rare ecosystems, habitat for species at risk and terrain types, as well as other benefits such as improving air, water, and human health.
- Permanent destruction of grasslands will be avoided where possible.
- Re-establishment of grasslands during progressive reclamation may be proposed as mitigation.
- The Application/EIS will identify end land-use objectives, taking into consideration the recommendation of Ministry of Energy and Mines that the reclamation program be aimed at ecological restoration of naturally occurring grassland communities. A Conceptual Reclamation and Closure Plan will be described in the Application/EIS. The plan will identify baseline studies and ongoing reclamation research that will be conducted throughout mine life.
- Security/reclamation bonds will be put in place in accordance with provincial requirements.
- Adverse effects on species at risk will be considered in relevant effects assessments and will be described in the Application/EIS. These VCs include Mammals, Rare and Endangered Plant, Grasslands, Raptors, Non-Migratory Gamebirds, Migratory Birds.
- Should the Ajax Project be approved and proceed, a variety of management and mitigation plans will be implemented to avoid or minimize adverse effects on grasslands, including:
 - Wildlife/Vegetation Monitoring Plan,
 - Air Quality Monitoring and Dust Control Plan,
 - Transportation/ Access Management Plan, and
 - Surface Water Management/Monitoring Plan.

As well, in regard to the impact of proposed mine activities and recreational pursuits, KAM has indicated:

- Potential effects on outdoor recreation will be assessed and described in the Application/EIS.
- Access to Jacko Lake will be maintained during operation. However, use of Jacko Lake and surrounding land will be restricted during blasting for public safety.
- Advance notification, when possible, of proposed blasts.
- Peterson Creek flows will be maintained downstream of the project area.
- Mitigation and offsetting approaches for potential effects on fish habitat are being evaluated as part of the Application/EIS. The Outdoor Recreation VC will consider potential effects on recreational fishing and present potential mitigation measures.

Economic

Comments that address economic VCs represented a spectrum of perspectives ranging from philosophical arguments for and against resource industries, to the long history in the area of mining and how the sector has contributed to the economy. The diversification of the Kamloops economy was raised, and while there was general appreciation for the importance of a diversified economy, there were varying perspectives on the roles that economic sectors such as mining, forestry, tourism, etc., should play in that diversification.

There were concerns voiced about the legacy of mining, as exemplified by problems encountered with historic mines in other jurisdictions. There were concerns expressed about the perceived “marginal grade” of the Ajax Project and mine viability, and the danger of commodity swings and boom and bust.

Comments have asked for a comprehensive socio-economic study to be completed so that potential effects on tourism, property values, professional recruiting, staffing and training for locals, etc., can be evaluated. Concerns have been raised about whether local residents who seek Ajax Project employment will be trained, and the possibility that some people might move to Kamloops just to work at the mine even though they have no connection or commitment to the community.

This thematic area also generated large numbers of comments from people who support mining and the Project. Many supporters have commented on the progression of mining technology, processes and regulations, saying that mining today is not comparable to industrial activity from previous eras. The contribution of mining to the economy, tax base and employment and the need for good-paying long-term jobs in this community were raised by both retired people and those still working.

The following describes KAM’s general responses to economic themes/comments:

- Potential effects on economic diversification will be assessed and described in the Application/EIS. The assessment will include a description of the relative contribution of notable sectors to the Kamloops area economy.
- Assessment will include estimates of contributions to GDP and government tax revenue (federal, provincial, and municipal).
- A mine plan has been developed based on a standard set of assumptions and estimates. Commodity price variations, increased regulatory requirements and other potential challenges to operating circumstances fall outside of the scope of the Application/EIS. Measures to ensure safe temporary closure, if it were required, will be discussed in the Application/EIS.
- A socio-economic impact approach will be used to assess potential Project effects on the economic and social VC’s identified. A cost-benefit approach would not materially contribute to the process of discerning and describing pathways of effects resulting from the Project.
- Economic effects of the Project will be assessed using realistic estimates of expenditures and taxes.

Project Related

The proximity of the proposed Ajax Project to the City of Kamloops has raised concerns about mining, as well as mine structures and processes, leading to an abundance of comments in this area. Concerns have been raised across a wide spectrum, including the possibility of failure of mine components.

Generally, KAM has responded by noting that:

- The Project has undergone a number of design changes, including relocation of tailings and mine rock storage facilities, which were moved farther south and away from Kamloops neighbourhoods.
- KAM will meet or exceed Ministry of Energy and Mines and other regulatory requirements regarding noise, dust and other operational aspects.
- KAM will implement best management practices and adaptive management.
- KAM will design the Project with closure in mind and implement progressive reclamation.
- KAM will model and monitor emissions, noise, dust, hydrometrics, surface and groundwater quality and quantity, traffic, dark sky (light).

Regarding more recent and specific concerns about the August 4, 2014, failure of a tailings storage dam at Imperial Metals' Mount Polley copper mine and the Ajax Project, the proponent has stated that the proposed Ajax Project TSF dams will utilize downstream construction buttressed with excavated mine rock. The company intends to use best-available technology and has committed to adopt best practices emerging from ongoing investigations and inquiries of the Mount Polley dam failure. The proponent continues to explore the nature of best-available tailings storage technology, including, thickened, paste and filtered or dry stack tailings storage. A full assessment of options is included in the proponent's Application/EIS.

KAM has consistently informed the public that the Application/EIS will include a Reclamation and Closure Plan. The Project will be designed with closure in mind; progressive reclamation will continue throughout the life of the Project. Security/reclamation bonds will be put in place in accordance with the Ministry of Energy and Mines requirements, and reclamation will continue until requirements are met. Reclamation, water quality and other relevant monitoring will continue until results meet regulatory requirements and further monitoring is no longer necessary.

As well, the Accidents and Malfunctions Assessment will include an analysis of the potential modes of Tailing Storage Facility embankment failure, and an assessment of the potential downstream effects for various failure scenarios.

Responses to Issues/Concerns Raised by Government or Regulatory Agencies

Through ongoing development, assessment and permitting processes, KAM consistently demonstrated responsiveness to regulatory concerns and considerations and made significant adaptations based on formal or informal government feedback.

Although many adaptations and modifications to the project's assessment have arisen out of specific meetings with members of government and the Working Group, this section highlights some of the significant changes that have resulted from government engagement.

As will be described in Section 4.7.2.4, KAM reviewed the project starting in September 2012 leading to the announcement of a new general arrangement in May of 2014. These changes were informed by community, First Nations as well as by regulatory consultation and engagement.

Of particular note was the considerable discussion undertaken regarding the former tailings storage facility location and methodology. Concerns with respect to the proximity of a large and unproven (at planned production rates) dry tailings facility next to the Coquihalla Highway were commonly raised.

Many Working Group members, including the City of Kamloops, shared community concerns regarding the visual impact of this industrial facility as travellers approached Kamloops from the south. Comments relating to the potential impact to the Tournament Capital of Canada brand, adopted by the City some years ago, were iterated in many discussions.

On a technical level, concerns were raised regarding the potential implications of an unforeseen facility accident or malfunction given the facility's proximity to one of the busiest transportation routes across British Columbia. Potential human, commercial and economic impacts of any failure were stressed by various government stakeholders.

In 2013, in response to these concerns, KAM undertook an alternatives assessment with respect to potential facility locations as well as TSF technologies. The result was a significant change to the location and chosen technology – the TSF was moved more than five kilometres southeast of its previous location.

Another key regulatory concern identified through consultation related to proposed project access, which was originally envisioned through the Copperhead interchange and south along Lac le Jeune Road. BC Ministry of Transportation and Infrastructure (BC MOTI) and City personnel challenged this configuration based on potential inadequacies of the existing road network for expected traffic volumes and load types. KAM explored alternatives, leading to the development of the current project access proposal, which will route all site traffic through an upgraded and reconfigured Inks Lake interchange. KAM developed eight alternatives for discussion and deliberation with government staff, and regulatory input was critical to the establishment of the preferred site access detailed in the Application/EIS.

Discussions with Working Group and government personnel regarding concerns about fish and aquatics also led to changes to the project. Following direction from Working Group members, KAM sought to focus all fish habitat offsetting within the same watershed as the project, in this case the Peterson Creek watershed.

KAM focused on a proposal and model that would see offsetting measures developed for both Jacko Lake and Peterson Creek, as Jacko Lake had seen similar offsetting during Teck's Ajax Mining operations during the 1980s and '90s. Following further discussions, the regulatory group, consisting

largely of personnel from FLNRO, DFO, MOE, outlined a preferred option – the development of a new sport fishery and wildlife ecosystem at Inks Lake. Inks Lake is directly adjacent the project and offsetting at Inks Lake is consistent with government objectives to ensure such work is performed in close proximity to the project.

The above examples demonstrate KAM's commitment to regulatory consultation and its willingness to proactively respond to government concerns.

Consultation and Controversy

The proponent recognizes that the Project is perceived by many in the Kamloops community to be controversial. KAM acknowledges that groups have emerged that are opposed to the Ajax Project. Those groups are actively working to convince governments, stakeholders and the public that the Project should not be allowed to proceed.

KAM has adopted a respectful attitude towards those who are opposed. The company's intent has been to not interfere with, dissuade or otherwise try to prevent those who are opposed from presenting their points of view. The proponent has not engaged in debates through the media or social media with opponent groups, nor has it been critical, dismissive or demeaning to the messages these groups deliver. The proponent has chosen to stay out of the public fray in relation to the expression of opinion about the Ajax Project, recognizing that in open democracies such as Canada, freedom of expression is a cornerstone right. The company will continue to remain respectful of those who oppose.

The proponent did attempt, however, to work co-operatively with one oppositional group as it was recognized this group bears considerable expertise, and was asking questions regarding areas of public significance – human health. The Kamloops Physicians for a Healthy Environment (KPHE) emerged in Kamloops in 2013 as a group with reservations about the Ajax Project and the regulatory assessment process being used to evaluate the proposed mine plan. KPHE called on governments to order a health impact assessment.

The proponent attempted to engage KPHE in a dialogue about health-related studies being undertaken by KAM. In early 2014, on three occasions, KAM invited KPHE by letter to meet with consulting third-party experts enlisted by KAM to conduct its studies, with the hope of understanding better the physicians' concerns. The proponent invited KPHE to meet privately with the company's third-party experts to discuss fully the nature, objectives, scope and technical requirements of ongoing studies, with the hope of determining whether there were other approaches that could also be employed.

KPHE declined to meet with KAM or its consultants unless the meetings were held as part of a public panel discussion or debate in front of an audience. KAM felt such forums would not lend themselves to productive sessions about the nature of the ongoing health studies since the consulting experts would be unable to properly discuss their work in progress (correspondence attached in Appendix 4.7-N).

4.7.2.4 *New “Ajax South” General Arrangement (May 29, 2014)*

The emergence of dominant themes of public concern profoundly affected the development of the Ajax Project. The first iteration of the proposed Ajax Project – a plan set out in a feasibility study prepared by Abacus Mining and Exploration in 2012 – was internally reviewed by KAM beginning in late 2012 and continuing into 2013.

Senior KAM management concluded that the first plan was untenable because of the proximity of key mine components to public infrastructure, and the public’s growing concern about those components. It was determined internally that the risk to successful acquisition of social licence as well as required permits was too great in light of mounting public and regulatory concerns.

In August 2013, KAM senior management publicly announced that the company would postpone submission of its Application/EIS as a result of an internal review of the proposed Ajax Project mine plan. The proponent had initially intended to submit its Application/EIS in September 2013. This decision had enormous cost implications for KAM.

In the months that followed, mine planners noted the public concerns gathered through the previously described consultation efforts and made key decisions about the future layout and operation of the Project.

On May 29, 2014, KAM announced the Ajax South General Arrangement (GA), which outlined an optimized Project design intended to address many of the concerns raised in earlier community consultation processes. Key changes to the Project included:

- relocating the Tailings Storage Facility more than five kilometres southeast, away from the Coquihalla Highway and farther from City neighborhoods;
- re-designing the Tailing Storage Facility from a dry stack (potential dust generation) to a conventional storage facility;
- relocating the north mine rock storage facility and temporary ore stockpiles, the two closest site structures to Kamloops, 3.5 kilometres southeast from their previous locations, to move potential sources of lights, noise and dust farther from the community; and
- re-designing the Project to avoid impacts to Inks Lake, initially proposed to be used as a TSF seepage pond. The lake, an important natural resource for recreational users as well as for wildlife, will no longer be impacted by mine operations.

The decision to redesign the mine plan was prompted in large measure by public concerns about the first Ajax Project plan, most specifically the location of the previously proposed dry stack TSF storage facility. KAM senior management understood that mine planning that did not properly evaluate and consider the needs and concerns of closest neighbours could not be successful.

4.7.2.5 Post-GA Announcement Consultation Phase (June 2014 to EIS Submission)

Following the announcement of the GA, KAM embarked on a new round of public consultation (the Post-GA Consultation period of the Pre-Application Pre-EIS Phase) to ensure the community and stakeholders were made aware of the new mine plan. These efforts included:

Media interviews – Meeting with reporters and media to brief them and provide current information. Under embargo (an agreement to provide early access to the media on condition reporters not publish before an agreed-upon time or date), reporters were given one-on-one interviews with senior Ajax Project managers to allow them the opportunity to fully understand the new GA and its implications. Interviews were arranged with newspaper, radio and television outlets.

Advertising – Newspaper, television, radio, and web-based advertisements informed the community of a new mine plan and directed people to the Ajax project website for more information.

Updates to the project website – A section was added to the Ajax Project website directing viewers to a map showing the location of new mine infrastructure in relation to where those same structures had been previously located. Another section was added directing viewers to the PDF version of the print booklet (explained below).

New documents – A new print booklet called *“We’ve Listened. Changes to the Ajax Mine Based on Community Input”* was distributed to more than 20,000 Kamloops homes via the *Kamloops This Week* newspaper flyer service. A PDF version was posted to the Project’s website and PlaceSpeak site. The fold-out booklet contained latest maps and other information explaining the changes to the GA (Appendix 4.7-E).

Open houses – KAM hosted three open houses to inform the public about the GA. The events were held at the Coast Canadian Conference Centre and at the Knutsford Community Hall from June 24 to 26. Approximately 200 people attended each day. Issues discussed during these sessions continued to inform mine planning and decision making.

For example, it was learned from an attendee that a historic Anglican Church had once been situated on Goose Lake Road in a location to be occupied by proposed mine infrastructure. A cemetery was said to be associated with the Church, however, no official Church or public records exist of burials at the site. Despite that, KAM undertook an extensive archaeological investigation to determine if there is a potential for graves in the locations suggested, including the use of ground-penetrating radar. That investigation, being done in consultation with the Kamloops diocese of the Anglican Church and BC Heritage Branch, continues although KAM has registered the area with the BC Heritage Branch as a heritage site. Mitigation plans will be developed in accordance with regulation and in consultation with the Church in the event that gravesites are confirmed.

Door-to-door canvassing – From mid-July 2014 through August 2014, KAM engaged a team of canvassers to visit homes in neighborhoods throughout Kamloops. The program was designed to:

- directly contact residents that KAM felt may have received insufficient information during past communication efforts;

- determine if the residents had sufficient information about Project; and
- provide information as needed, especially in regard to the new GA.

Canvassers carried and shared a variety of materials including the “We’ve Listened” booklet, which included a Project map. Canvassers reached 16,000 doors through the campaign and spoke directly with 6,500 people. In instances when people did not respond at the door, the teams left behind a “doorknocker” that contained contact information and links to online sources about the Ajax Project and the new GA.

New GA-specific site tours – More than 600 people were toured through the Ajax site in July and August 2014 as part of a dedicated effort to inform the public about the new GA. The new site tour used new signage and visual aids to help people better understand the potential impact of the new GA (attached in Appendix 4.7-D).

Small group sessions – KAM met with groups to discuss progress on the EA and to solicit feedback on potential interactions and possible mitigations. These meetings have offered explanations about how information provided through the consultation process has been or will be addressed, and an explanation of possible commitments and design-related decisions that have been or will be made as a result of input in the planning and assessment process. Presentations were given to several groups, including:

- Association of Government Licensed Professions, Annual General Meeting;
- Venture Kamloops;
- Presentation to the Association of Professional Engineers and Geoscientists of British Columbia, South Central Branch;
- Kamloops Clergy Council; and
- The Kamloops Gyro Club.

A special information session and site tour was organized to educate prospective Kamloops City council candidates about the new GA. The session was held on October 26, 2014, during the 2014 civic election campaign. Eighteen candidates attended the session, which saw KAM senior managers and technical staff present to the group. After, the room was opened to questions. Following the 90-minute session, the group of civic candidates was taken by bus on a dedicated tour of the proposed Ajax Project site.

Third EAO-mandated public comment period/open houses – In November 2014, the BC EAO announced a third public review period for the Project’s revised AIR/EIS Guidelines (ePIC 2014) as a result of changes to the GA. The period started November 18, 2014, and closed December 22, 2014. Two open houses (November 25 and 26) were directed by the BC EAO, and hosted and facilitated by KAM to share information and gather public input in this period. Nearly 900 people attended these events.

4.7.2.6 *Assessing the Pre-Application Pre-EIS Consultation Process/Best Practices for Application Review Phase*

The proponent has worked to identify means and metrics to gauge the efficacy of its consultation efforts. The metrics are based on both quantitative and qualitative assessments.

KAM has made no attempt to weigh whether its pre-Application/EIS consultation efforts have swayed, affected or altered public perceptions in favour of the Ajax Project. KAM has been most interested in learning only that people have received information they can use – not how or whether that information affected their decision making about the Ajax Project.

The proponent has relied on three main feedback mechanisms to help assess the success of its consultation efforts and guide its consultation efforts through time.

Polling

KAM contracted with the Vancouver-based research firm NRG Research Group to conduct a series of objective phone-based polls across time to determine the success of its outreach and consultation efforts into the community. The firm used standardized polling methodology. Five polls were conducted through the pre-Application/EIS consultation phase starting in 2011 and continuing until mid-2014.

The polling used standardized sample sizes (approximately 350 people) and asked a standard set of questions, giving meaningful ability to assess shifts through time. Polls were accurate to plus or minus five percent, 19 times out of 20.

While the proponent took the opportunity afforded by the research effort to explore various topics, key questions related to the public awareness, understanding and knowledge of the Ajax Project as well as how people came by the information they had were routinely asked.

Among other questions, the polls consistently asked:

- What, if any, sources of information have contributed to your knowledge of the Ajax Project?
- Are you aware of any efforts the company has made to provide information on the project to the community?
- What efforts are you aware of that the company has made to provide information about the Project?
- Overall, on a scale of 1 to 7 with 1 being 'Poor' and 7 being 'Excellent', how would you rate the efforts the company has made to provide information about the project to the community?
- Is there anything else you feel the company should be doing in its efforts to consult with the community?
- What would be your preferred methods of communicating with the mining company?

Results show that increasing numbers of people were made aware of KAM and the Ajax Project through the proponent's efforts between 2011 and 2014.

A poll in July 2014 also asked people if they were aware of the changes to the proposed mine plan that were announced May 29. Seventy-five per cent of respondents to this question indicated they were aware.

The same poll also found that the vast majority of Kamloops residents were aware of efforts KAM has made to provide Project information. In fact, 89 per cent of area residents were aware of efforts the company has made to provide information on the project to the community. Fifty-one per cent of people said they had learned Project information through KAM advertising, 42 per cent said they had received information by way of KAM open houses, while 30 per cent cited KAM's direct mailouts as a source of information. The poll questions and results are attached in Appendix 4.7-O.

Direct Feedback

The proponent has also used direct feedback to assess the efficacy of its consultation efforts. Questionnaires were made available at most KAM open houses and events inviting people to provide feedback about the nature of the events. Such feedback informed the manner in which future events were staged.

An example can be found in the feedback received from the Community Advisory Group following an April 2012 open house and workshop (ePIC 2012b). Table 4.7-3 presents a summary of the feedback received in four key areas.

Qualitative Research

In March 2015, KAM contracted NRG Research to perform an extensive round of qualitative research regarding the Ajax Project's consultation in the community and with stakeholders. The research was designed to measure the impact of consultation efforts, in other words – did the information and opportunities from KAM offer people the opportunity to learn about the Ajax Project in a meaningful way? As well, the research was intended to inform the KAM's future consultation activities.

Table 4.7-3. Feedback from April 18, 2012 Workshop

DESIGN	SUPPORT
<ul style="list-style-type: none"> • The workshop objectives were clear • The workshop activities stimulated learning • The activities gave participants sufficient information and feedback • The difficulty level was appropriate • The pace was appropriate • The length of the workshop session was appropriate • Breaks were sufficient 	<ul style="list-style-type: none"> • The facilitator was knowledgeable, well prepared, responsive to participant's questions (added value) • The moderators were knowledgeable, well prepared, responsive to participant's questions (added value) • The presenters were knowledgeable, well prepared, responsive to participant's questions • Other support present at the workshop was useful/ added value
CONTENT	LOGISTICS
<ul style="list-style-type: none"> • The workshop content was relevant, comprehensive, easy to understand • The workshop was well organized • The amount of content/ topics covered was appropriate for the length of the workshop • The presentation provided useful information • The handouts provided useful additional information 	<ul style="list-style-type: none"> • The workshop was well advertised • Ample advance notice was given for pre-registration • The venue was comfortable, accessible, well located • The seating arrangement was appropriate for the audience/ workshop objectives • The day and timing of the workshop was appropriate

This research was done at the end of the pre-Application/EIS phase because it was important for the proponent to understand how to plan for consultation through the Application/EIS review phase, when the results of the many environmental assessment-related studies and management plans will become public.

Insights gained through this research effort helped KAM to plan its consultation activities for the Application/EIS review phase (outlined in Section 4.7.3.1). Key findings in the NRG research indicate:

- Area residents are aware of the project and most (79%) are following it in the media or with additional sources;
- There is not a perception in the community that there is much information missing;
- Media advertisements (newspaper, television, and radio) and mail are the top ways residents would like to receive information about the project from KGHM. Community open houses and social media are also important ways to reach out to the community;
- Environmental, Health, and Economic Impacts are the areas of most interest for the information in the EA application. Residents want to be able to understand the magnitude of the potential risks the project could introduce, find out what can and will be done to mitigate these risks, and compare this to the economic benefits the proposed project could bring to the region;
- There is an appetite in the community to have the Environmental Assessment application available in its entirety (44% of residents would use it);

- The majority of residents would use ‘one- to two-page FAQ sheets’, ‘information presented in the news’, and ‘three- to five-page summaries’. The changing media landscape in Kamloops appears to present a challenge to the distribution of information. Given that Kamloops has only weekly newspaper coverage and limited regional news media, having short summaries of the information contained in the report easily available to everyone in the community will help to ensure all area residents can be well informed;
- There is some skepticism about informational materials produced by KGHM Ajax as the proponent of the proposed Ajax project; however two-thirds of area residents would use materials presented by the company to learn about the content of the Environmental Assessment application. Releasing the entire document will allow all parties to confirm that information is accurately and fairly reported; and
- Communications about the information in the EA application are perceived to be most useful if they use layman’s terms to clearly identify a problem, the possible risks, the solutions that will be used to mitigate risks, and the actual impact that the community will feel. The use of comparisons to items, actions or feelings the reader can understand and process (e.g., vibrations within a certain distance from a blast site will feel like standing next to a dryer on high speed) will likely be more effective than those presented in scientific metrics. Making it easy to reference the source of this information in the original EA document will also increase the perceived neutrality of such documents.

As well, the research gave insights about best engagement practices for Kamloops in the future. Interview responses surrounding the best method KAM can use to provide the community with information about the project illuminated the need for the proponent to use a broad and diverse range of methodologies to communicate with area residents.

More than one respondent referred to the fact that there is limited media in the area (no daily newspaper and only partial local TV media), the implication being there is nowhere for residents to get what they feel to be reliable, unbiased information. Respondents highlighted different methods based on their own personal experience, but there was agreement from many that not everyone will use or see all channels, so a “broad spectrum” approach is important. Specific mention was made of:

- the weekly paper, radio, television;
- the company and social media websites;
- going to the people in rural areas where internet is not reliable;
- having face to face and town hall/open forum meetings; and
- making hard copies of any materials available at the KGHM Ajax office and City Hall.

The full NRG report can be found in Appendix 4.7-O.

Media Outreach

The local media provide an important channel of communication with the public and stakeholders. It is important that reporters have the ability to properly report on the release of the Application/EIS after it is publicly released. KAM reached out to six local media outlets (Kamloops This Week, CFJC-TV, Radio NL, CBC Kamloops, The Armchair Mayor, Infotel News) to survey their needs and requirements in advance of the public release of the Application/EIS. The media were asked the following by email and in follow-up telephone conversations:

- What requests do you have when it comes to the release of the EA studies?
- How can KGHM assist you to understand the science?
- Are there any special requirements you can think of that you might need or want to help you and your reporters tackle this task?
- Will you have special deadlines to meet?
- What would you like or want from KGHM as we release the science?

Four of six local outlets responded:

- *Kamloops This Week*:
 - We need access to information ahead of the official release. We can't be scrambling on that day to get through it all and understand it.
 - We at the very least need the plain-language summaries ahead of time. A week would be awesome; a few days would suffice.
 - We really need a dictionary of the application language, too.
 - It'd be good to have the option of speaking with their consultants – probably over subsequent days after the reports drop – to get them to explain some of the methodology and such. Plain language summaries only go so far.
 - Would be good to get a heads-up before the date the application will be sent so we can try to arrange a meeting to go over summaries ahead of time (with embargo, if necessary). We need to be able to have as full an understanding as possible well ahead of the date we can publish.
 - Need to have Ajax or consultants available to reply to whatever it is the anti-Ajax groups will be saying after they see the studies/application.
- CBC Kamloops:
 - Start with company reps on the day of the public release to provide an overview of the application and what is in it.
 - Provide embargoed, early access to the plain language summaries.
 - In following days, be available for round-table discussions with KGHM experts (with opponents) on air quality, tailings management and other key topics. We will dedicate a segment of the show over several days to each specific issue.
 - We are looking for ways to understand the issues, not a shouting match.

- Radio NL:
 - Provide point-form summaries of the technical information; best provided early under embargo.
 - As soon as it's released, make KGHM managers available to provide an overview of the Application/EIS and what's in it.
- Mel Rothenburger, The Armchair Mayor (online blog):
 - Timely and easy access to the full studies.
 - Clear cross-referencing from the plain language summaries to the studies, so that we can quickly get into those parts of the studies to check/ read in more detail information provided in the summaries/fact sheets/Q&As.
 - Contact information for experts and KGHM spokespersons on specific references in the studies and summaries (and timely responses from them when media are looking for clarifications or comments).
 - Photos to illustrate specific studies and summaries would be excellent.
 - You might consider media briefings on the science.

The proponent will endeavour to provide for the unique needs of the local media to the best of its ability to enable news outlets to provide the public with analysis and information about the Application/EIS.

4.7.3 Consultation Planned during Application/EIS Review

4.7.3.1 Consultation Activities Planned with the Public

This section describes how KAM intends to consult the public during the Application/EIS review phase. The goal of this consultation phase is to provide the public with the results of the environmental studies and effects assessments, assist the public in understanding the Application/EIS, provide mechanisms for feedback and learn more about community perspectives, issues and concerns regarding the proposed Ajax Project to address those concerns through mitigation efforts.

The Application/EIS review phase will commence with the successful acceptance of the Ajax Project Application/EIS. Under the BC *Environmental Assessment Act*, this phase is 180 working days. The period is 365 days for review under federal statute, however, the period that is taken by the proponent to respond to a request from the Agency (conduct studies, prepare environmental impact statement, collect further information, etc.), is not counted in that timeline.

The regulatory requirements for this consultation phase are detailed in subsections 14.1, 14.4, and 14.5 of the section 11 Order, stated as:

- The Proponent must include in its application:
 - a summary of public consultation activities that the Proponent has already carried out in relation to the proposed Project, and

- a proposal for public consultation that the proponent plans to carry out for purposes of the review of the Application, consistent with the plan outlined in section 10.1. The proponent must specify the location and timing of public consultation activities to be undertaken during the review of the Application;
- The proponent may be required to undertake further consultation activities to ensure adequate consultation on the Application within time limits set by the Project Assessment Lead; and
- The proponent must complete the activities outlined in the public consultation plan during the application review stage, including any additional measures for consultation specified by the Project Assessment lead, within the time limits set by the Project Assessment Lead.

The proponent will comply with the requirements.

This is an important and necessary phase of the consultation process. In the pre-Application/EIS phase, the proponent emphasized the need for patience as the EA studies were being prepared. With the acceptance of the Application/EIS, the public rollout of the Project-related science will begin.

Table 4.7-4 describes the timing and methods KAM plans to use to consult the public during the Application/EIS Review. KAM will support the Application/EIS review process by working with the BC EAO and the CEA Agency and providing material assistance, corporate engagement, or technical expertise as necessary or directed by regulatory entities. Interactions with the public and stakeholders will continue to be tracked internally in SIIMS and Aconex.

Table 4.7-4. Summary of Planned EIS-Review Phase Consultation Activities (based on Q3 submission)

Press Release	
<ul style="list-style-type: none"> • Prepare and distribute a press release to local media, as well as purchase newspaper advertisements, radio announcements and / or other methods to announce the acceptance of the Application/EIS for review by the CEA Agency and BC EAO, and to announce the start of the public comment period. These announcements will occur at least seven days before the beginning of the formal comment period. • Digital copies of the press release will be made available to the public directly through the Project website, Facebook page, PlaceSpeak, as well as by e-mail or other means as requested by the Project assessment lead. 	Upon acceptance of the Application/EIS
Public Libraries / City Hall	
<ul style="list-style-type: none"> • Hard and digital copies of the Application/EIS will be provided to the Kamloops and North Kamloops public libraries, as well as to City Hall. Copies will also be available at the KAM offices for on-site review. 	Upon acceptance of the Application/EIS
Community Capacity Funding	
<ul style="list-style-type: none"> • KAM intends to provide funds to the City of Kamloops to enable further independent third-party review of the EA studies as requested by the City. Details to be determined in further discussion with the City. 	Pre-submission

(continued)

Table 4.7-4. Summary of Planned EIS-Review Phase Consultation Activities (based on Q3 submission) (continued)

Press Release	
Dedicated Web Platform	
<ul style="list-style-type: none"> • KAM will develop and launch a dedicated web platform additional to its existing website specifically designed to effectively convey the contents of the Application/EIS. The platform will have a clear table of contents and other hierarchies to help guide readers and users efficiently through the document. Document downloads will also be available. 	Upon acceptance of the Application/EIS
Plain Language Summaries	
<ul style="list-style-type: none"> • KAM will develop plain language summaries of the VC assessments and other high-interest aspects of the Application/EIS. The summaries will be made available through the dedicated web platform described above. 	Upon acceptance of the Application/EIS
Gather Feedback	
<ul style="list-style-type: none"> • Meet with public who want information or want to provide feedback on the Application/EIS in individual and small-group meetings. • Where meetings are not possible or are not requested, correspond with public by phone, e-mail, letters and through the PCP information sessions. 	Through the 75-day PCP
BC EAO-led Working Group	
<ul style="list-style-type: none"> • Participate in BC EAO-led Working Group, and sub-committee meetings, upon request. 	To be determined by BC EAO
BC EAO-led Community Advisory Group	
<ul style="list-style-type: none"> • Participate in BC EAO-led Community Advisory Group meetings, upon request. 	To be determined by BC EAO
Information Sessions / Comment Period Events	
<ul style="list-style-type: none"> • Arrange, facilitate, and participate in community presentations, information sessions and/or other forums hosted by KAM and/or as directed by BCEAO and the CEA Agency. Sessions will take place during the public comment period, at the direction of BCEAO and the CEA Agency. KAM proposes to host four public events in the PCP, which are detailed in the section below). • Prepare and distribute a press release, newspaper advertisements, radio announcements and social media to announce the information sessions. These announcements will occur at least seven days before the beginning of the first information session, or as directed by BCEAO and the CEA Agency. • The information sessions will be similar in format to those held in September 2013 and/or June and November 2014 and will focus on key areas of public interest such as water quality, air quality, human health, noise and vibration as well as other VCs and topics. KAM and its consultants will attend to explain the Project, the EA baseline studies and effect assessments, answer questions, and receive feedback as requested by BC EAO and CEA Agency. • Similar materials will be made available as in past sessions as will cards for feedback and a web-based comment option, or as directed by BCEAO and the CEA Agency. 	<p>Two sessions within 25 days of the start of the PCP, and two sessions within 25 days of the end of the PCP.</p> <p>These forums will be held in large publicly accessible locations such as the ISC, Thompson Rivers University or the Coast Canadian Conference Centre</p>

(continued)

Table 4.7-4. Summary of Planned EIS-Review Phase Consultation Activities (based on Q3 submission) (completed)

Press Release	
Site Tours	
<ul style="list-style-type: none"> Continue to offer site tours, as appropriate. 	As needed or requested
Announce Outcome of Application/EIS Review	
<ul style="list-style-type: none"> Prepare and distribute a press release announcing the provincial and federal ministerial decisions on the Application/ EIS. 	Upon decision

Section 16 of the section 11 Order requires at least one formal public comment period of at least 75 days on the Application/EIS. Specific events such as information sessions, workshops, or other events will be arranged in accordance with the Order and requests from the BC EAO/CEA Agency.

As required by the section 11 Order, KAM will advertise open houses and the start of public comment periods using local and online media as well as social media at least seven days in advance of the event, or as otherwise directed by the BC EAO and CEA Agency. KAM will comply with any and all direction from BC EAO and CEA Agency regarding consultation activities and/or information sharing that must take place during this phase.

The proponent will create a consultation report following the close of the formal public comment period, or as directed by the BC EAO and CEA Agency, identifying issues and concerns raised by the public with respect to the Project, and identifying how concerns will be addressed or how issues will be resolved. A summary of public issues and KAM responses will also be tracked and reported.

More specifically, KAM's consultation activities in the Application/EIS review phase will include, employ, implement or entail use of the following:

Dedicated Web Platform, Plain Language Summaries

KAM understands that many in the community are concerned about the prospect of attempting to understand the voluminous and technical contents of KAM's Application/EIS. The dedicated web platform, which will exist separately but be linked to the Ajax Project's main website, will strive to:

- align with BC EAO and CEA Agency principles of engagement (as defined in the Overview);
- demonstrate the highest levels of transparency;
- meet varying levels of public interest and understanding; and
- be consistent across multiple platforms of information delivery.

KAM researched best practices in this area of engagement and consultation and identified ways in which other projects and proposals have rolled out similar kinds of materials. The proponent, in the end, adapted the best of several examples and intends to build an information distribution model that will:

- include HTML and PDF versions organized in a strong hierarchy, with synopses of contents;
- provide a range of informational “levels” for people – from the complete studies to plain-language summaries, fact sheets and FAQs; and
- support electronic distribution with a print campaign that sees all demographical groups offered means to view the EA-related studies and management plans.

This web platform will offer:

- clear organization and a user-friendly navigational experience, with concise tables of content and synopses, and superior database management;
- search capability – the ability to keyword search across documents/pages to find keywords of interest and access all documents that reference those key words;
- ability to combine keywords with common Boolean operators to create powerful searches;
- full, reportable metric tracking/stats.

A key functionality in the proponent’s dedicated web platform will be the inclusion of “plain-language summaries” as well as other even simpler versions of the Application/EIS technical studies. All related documents will sit side-by-side on the relevant sections of the website, allowing users the opportunity to digest information based on their availability of time, expertise and level of interest. The proponent intends to offer:

- one-page orientations for technical studies explaining what the study addresses and how the issue is studied;
- profiles of subject experts/consultants (bio, resume, other important career highlights);
- plain-language summaries – highlights study approach, key facts and findings, citing sections and page numbers within the larger technical study;
- fact sheets (two to three pages) – highlights key information and findings; and
- Q&As – Focusing on key facts and findings.

Mailout to City Residents

The proponent will create a printed high-level summary of the Application/EIS that can be distributed by Canada Post to Kamloops households. The direct mail approach is preferred to other forms of distribution as it ensures documents reach their intended audience (in comparison to newspaper flyer service). A digital PDF version of the booklet will also be created and placed on the Ajax Project website, with notifications given through social media sites.

Community Capacity Funding

As of July 31, 2015, the proponent has been in discussions with the City of Kamloops to provide capacity funding for the purpose of allowing the City the opportunity to engage a meaningful third-party review of the Application/EIS. KAM intends to make funds available (levels to be determined in consultation with the City of Kamloops) to allow the City to engage its own independent experts for review of the Ajax Application/EIS, as well as to host City events to aid public understanding of the science. The capacity funding effort will be more fully detailed in the Application/EIS Review phase consultation report.

Neighbourhood Open Houses / Workshops

KAM intends to host special information sessions for neighbourhoods, with invitations made through a directory of Kamloops's neighbourhood associations. These sessions will emulate the small-group model detailed in sections above, and be designed to provide a meaningful two-way exchange between the proponent and residents.

Public Information Sessions (Required by BC EAO/CEA Agency)

The section 11 Order mandates at least one public comment period of 75 days. The proponent will coordinate open houses and information sessions in this period as directed by BC EAO and CEA Agency. KAM is open to direction from regulatory agencies regarding the number and scope of such information sessions and workshops. KAM proposes at least four public events in this public commenting period. It is expected such events will emulate similar open houses held in the pre-Application/EIS stage (in September 2013 and/or June and November 2014) and will focus on key areas of public interest such as water quality, air quality, human health, noise and vibration as well as other VCs and topics. KAM and its consultants will attend to explain the Project, the EA baseline studies and effect assessments, answer questions, and receive feedback.

The proponent proposes the first two information sessions will be held at a large-capacity public venue such as Thompson Rivers University or the Interior Savings Centre shortly after the start of the public comment period. The moderated sessions will offer open group-round presentations so the public has flexible means to engage with KAM management and experts. The events will provide the public the opportunity to hear directly from key consultants, who will present their findings. The public will be provided the opportunity to ask questions. Feedback will be sought and encouraged.

KAM proposes to host two more public information sessions nearer the end of the PCP. These events will follow an engagement model employed during the November 2014 PCP information sessions, which allowed people to circulate through a large-capacity venue to visit stations, and speak with consultants and experts in topics or areas corresponding to their interests. It is suggested these events be held near the end of the PCP to give people time to digest the contents of the Application/EIS and be better informed about areas that might raise questions or cause them concern.

KAM will advertise all sessions a minimum of seven days in advance through local media and through social media and web platforms, and will provide specific written invitation to key stakeholders, especially groups that have expressed interest in the progress of the Ajax Project.

KAM understands it will also be required to report views and concerns raised by the public with respect to the proposed Project and how the proponent intends to handle them, as required by s. 18.1 of the section 11 Order. KAM intends to respond to comments filed in the associated public comment periods as it has in the past with similar comment periods, or as directed by the BC EAO/CEA Agency.

Media Interviews / Dedicated Workshop

The community's media are a powerful force for information dissemination. KAM will endeavour to ensure that local reporters are well informed about the Ajax Project Application/EIS. Part of that effort will include hosting a dedicated workshop for media only, giving reporters the opportunity to meet with KAM managers to ask questions about the Application/EIS and its contents. This workshop will be held shortly after the Application/EIS has been screened and accepted by government. Local and regional media will be directly invited to attend. KAM will endeavour to accommodate media schedules and deadlines regarding scheduling to the best of its ability.

Small Group Presentations

The proponent will continue to make presentations to small groups – especially key stakeholder groups such as nearby neighbourhood associations, angling or other recreational groups – for the purpose of sharing information about the Project, the Application/EIS and its science, and soliciting input and feedback about proposed mitigation and management plans.

One-on-One Meetings

KAM is prepared to meet with individuals, especially individual stakeholders such as Knutsford landowners, ranchers or other tenure holders, to address concerns related to the Ajax Project, and to learn ways that mitigation plans can be adapted or improved to lessen impacts.

Multimedia Materials, Whiteboards, Presentations, etc.

KAM will continue to update or supplement its slate of informational materials, as well as add new informational pieces that provide more and deeper context about the Ajax Project and the Application/EIS. The goal will be to offer high-level, easily digestible synopses of key information and findings, as well as to provide people with means and methods to learn more. Videos, whiteboard presentations, PowerPoint presentations, 3-D flyover and mine models, etc., will all be considered.

Reporting

The proponent will prepare a written consultation report detailing the results of the above noted consultation efforts, as well as the issues and concerns raised by the public and how KAM intends to handle them, as mandated by the section 11 Order.

4.7.3.2 *Consultation Activities Planned with Government/Agencies*

Presentation of High-level Findings to City of Kamloops, TNRD, and Other Agencies

The proponent will present high-level summaries and key findings to local governments, including the City of Kamloops and TNRD board. KAM will answer questions and commit to providing full answers in instances when questions cannot be immediately answered.

Other Consultation Activities

The proponent will continue close engagement with regulatory agencies and other levels of government through the Application/EIS review period, including participation in technical meetings, discussions of preliminary results/findings, baseline reports and potential effects with appropriate government stakeholders.

KAM will also develop a documented, publicly transparent protocol to resolve outstanding issues, a protocol that will continue into the Post-Application phase. When a complaint or issue is received from a member of the public, groups, or other stakeholder, KAM will attempt to resolve outstanding issues by:

- logging the complaint in internal databases to ensure the issue is dealt with promptly;
- obtaining additional details regarding the issue as necessary from the individual, group and/or from technical experts with expertise on the issue;
- meeting as needed to discuss and resolve the issue;
- responding to the individual or group about the issue as it remains outstanding; and
- reporting back to the individual or group on the status of the issue, and checking with the individual or group(s) to determine whether the issue has been sufficiently addressed.

4.7.4 Post-Application/EIS Review Phase

Should the Project be approved by the environmental assessment process and move into permitting and operational phases, KAM will continue to engage with the community and stakeholders to promote positive and constructive long-term relationships. Continued dialogue will ensure issues that may arise during construction or operation are addressed.

A key task in this phase will be the continued development of methods, protocols and processes to resolve outstanding issues, concerns or complaints. Further methods could include creation of dedicated citizen committees to aid in monitoring as well as participation in transparent grievance mechanisms. KAM believes the involvement of the public in such a manner will help to bring the Ajax Project into the community as a full partner.

KAM is committed to transparency and integrity in all of its business operations, and understands that the Project may affect some Kamloops residents. The proponent will work with individuals, neighbourhoods and the community to develop and implement long-term economic, social, and environmentally sustainable benefits and opportunities while avoiding, minimizing, and mitigating potentially negative Project effects.

4.7.5 Conclusion

The Ajax Project is unique in BC. No other recent major mining project has proposed a plan in close proximity to a major BC city. KAM has recognized that as a result, its consultation responsibilities to the community of Kamloops are great, and the need to properly engage with residents and stakeholders significant.

The proponent has worked hard to meet the requirements in the section 11 Order and the AIR/EIS Guidelines, and believes it has fully met those obligations as they relate to the pre-Application/EIS stage of the process. However, KAM has also strived to do more than “check the required boxes” in a list of consultation activities.

KAM has listened to residents and taken the community’s interests to heart, a fact reflected by the significance of its decision to redesign the mine plan and move infrastructure farther away from homes and neighbourhoods. That decision was born out of direct interaction with the community, through listening to concerns about proximity, and acting accordingly.

The redesign of the Ajax Project GA reflects engagement meeting the highest principles of consultation; standards embraced by the BC EAO, CEA Agency and the International Association for Public Participation, a body dedicated to improving standards of consultation and engagement worldwide. Redesigning the Ajax Project demonstrated a willingness, in essence, to confer levels of decision-making power to concerned stakeholders. Simply stated, KAM heard concerns and acted significantly to address them, which is at the very heart of the best consultation and engagement.

The proponent believes its consultation and engagement activities have laid the foundation for the continuing development of a long-term mutually beneficial relationship with community stakeholders.

As well, this report identifies the steps KAM will take to help the community learn about both benefits and impacts related to the Ajax Project a requirement of the section 11 Order. The process, both past and into the future, will enable the creation of long-lasting partnerships that will survive past the Application/EIS review phase, into operations and eventually into closure and reclamation. The proponent intends to maintain the relationships it has built – and continues to build – through the life of the project.

REFERENCES

Definitions of the acronyms and abbreviations used in this reference list can be found in the Glossary and Abbreviations section.

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