

25. COMPLIANCE REPORTING AND FOLLOW-UP PROGRAM

25.1 INTRODUCTION

HD Mining will initiate a program of monitoring and reporting to support the environmental assessment for the Project which will be carried out over the life of mine. Activities undertaken by HD Mining will be subject to various types of reporting that will address general legal requirements as prescribed under various statutes, and will also include more specific compliance reporting required under provincial and federal authorizations. This program will also be used as part of a follow-up program to support the federal EA Decision Statement.

25.2 COMPLIANCE REPORTING

HD Mining will apply for and obtain the necessary authorizations for Project activities and components as required under federal and provincial legislation, and will maintain required permits for the life of the Project, complying with:

- the provisions of federal and provincial legislation and regulations; and
- the conditions of the Environmental Assessment Certificate, federal Decision Statement, permits, licences, and other authorizations and approvals.

Based on the EMS and EMPPs outlined in Chapter 24, Table 25.2-1 provides a preliminary list of the monitoring parameters, the phase of the Project when the monitoring would be needed, as well as the responsible agency and particular regulatory instrument needing to be adhered to. This list will be updated as further reporting requirements are identified.

At minimum, the results of the monitoring programs will be reviewed and reported annually through evaluation of the EMS. The review will include:

- an evaluation of the effectiveness of mitigation measures; and
- a summary of adaptive management efforts that have been initiated in response to monitoring results.

Additional review and reporting will be completed in accordance with the final reporting commitments of individual permits/authorizations.

Table 25.2-1. Compliance and Follow-up Monitoring and Reporting Requirements

Monitoring Parameter	Project Phase	Agency/Instrument
Air Quality and Dust Control		
Monitoring of the following air quality parameters will be undertaken:	Construction Operation	BC MOE/ <i>Environmental Management Act</i> (2003) Air Permit
<ul style="list-style-type: none"> • meteorological conditions; • dustfall; and • GHG emissions 	Decommissioning and Reclamation	
Noise		
Noise monitoring	Construction Operation	BC MEM/ <i>Mines Act</i> Health, Safety and Reclamation Code of BC compliance
Soil Salvage		
Monitoring of salvaged soils for reclamation.	Construction Operation	BC MEM/ <i>Mines Act</i> Permit
Erosion and Sediment Control		
Monitoring the installation and effectiveness of erosion and sediment control measures.	Construction Operation	BC MOE/ <i>Environmental Management Act</i> (2003) Effluent Permit
	Decommissioning and Reclamation	BC MEM/ <i>Mines Act</i> Permit
Water		
Monitoring water management infrastructure to:	Construction Operation	BC MFLNRO Water Licence
<ul style="list-style-type: none"> • ensure the performance of water management structures and systems; • identify and promptly address areas where upgrades, modifications, or additional mitigation measures are necessary; and • measure actual water use on-site (intake, recycling, discharge). 	Decommissioning and Reclamation	BC MOE/ <i>Environmental Management Act</i> (2003) Effluent Permit BC MEM/ <i>Mines Act</i> Permit
ML/ARD		
Maintain geochemical inventory of all waste rock and CCR materials	Construction Operation	BC MEM/ <i>Mines Act</i> Permit
Flocculent		
Record amount of use and timing Toxicity testing of effluent	Construction Operation	BC MOE/ <i>Environmental Management Act</i> (2003) Effluent Permit BC MEM/ <i>Mines Act</i> Permit
Selenium		
Sampling program to include: water, sediment, periphyton, benthos, fish tissue, fish egg, bird egg	Operation Decommissioning and Reclamation	BC EAO/EA Certificate CEAA Decision Statement
<ul style="list-style-type: none"> • detect changes in the aquatic receiving environment before there is the potential for effects to occur; and • allow for the development of adaptive management and mitigation strategies, before adverse effects can occur in aquatic biota. 	Post Closure	BC MOE/ <i>Environmental Management Act</i> (2003) Effluent Permit BC MEM/ <i>Mines Act</i> Permit

(continued)

Table 25.2-1. Compliance and Follow-up Monitoring and Reporting Requirements (completed)

Monitoring Parameter	Project Phase	Agency/Instrument
Invasive Plants		
Monitoring for presence of invasive plants	Construction	BC MEM/ <i>Mines Act</i> Permit
Monitoring effectiveness of treatment efforts	Operation Decommissioning and Reclamation	
Wildlife		
Observations of wildlife use in the Project footprint, particularly for moose, bears, furbearers, migratory birds, and western toads.	Construction Operation Decommissioning and Reclamation	BC EAO/EA Certificate BC MOE
Tracking of direct mortalities		
Moose population and distribution		
Heritage Resources		
Chance Find observations	Construction	Heritage Conservation Act
Monitoring in advance of subsidence	Operation	BC Archaeology Branch
Subsidence		
Monitoring of subsidence above areas of active mining	Operation	BC EAO/EA Certificate CEAA Decision Statement BC MEM/ <i>Mines Act</i> Permit
Waste		
Inspection/audit of waste storage and segregation.	Construction Operation Decommissioning and Reclamation	BC MEM/ <i>Mines Act</i> Permit
Spill Response		
The Spill Response Plan provides for the monitoring of:	Construction Operation Decommissioning and Reclamation	Environment Canada/Spill Reporting Regulation (BC Reg. 263/90) Transport Canada/ Environmental Emergency Regulations (SOR/2003-307) BC MOE/ <i>Environmental Management Act</i> (2003) Spill Reporting Regulation (BC Reg. 263/90)
<ul style="list-style-type: none"> the results of post-spill investigations and reporting. 		

25.3 FOLLOW-UP PROGRAM

Under CEAA, 2012, a follow-up program means a program for:

- verifying the accuracy of the environmental assessment of a designated project; and
- determining the effectiveness of any mitigation measures.

As far as verifying the accuracy of EA conclusions is concerned, based on the assessment results in areas of federal interest (see Section 26.2), none of the VCs assessed warrant a specific verification follow-up program beyond the programs that are summarized in Table 25.2-1, which will be tracked through project-specific permit requirements.

There were no significant adverse effects predicted with respect to Aboriginal peoples as indicated in Chapter 20. Mitigation measures identified through consultation with Aboriginal groups include:

- participation in ongoing monitoring, during all Project phases;
- ongoing communication with the Proponent, including translation of technical reports for SFN membership; and
- continuity of use (e.g., via ongoing monitoring) to prevent the creation of 'avoidance areas' for SFN members.

HD Mining will continue to work directly with individual Aboriginal groups to develop specific means of implementing these types of mitigation measures.

HD Mining has developed an approach to responding to outstanding issues from Aboriginal groups, and will continue to respond to comments/issues raised in a timely manner. Where appropriate, HD Mining will consider holding additional open houses, and/or targeted meetings to provide additional information and respond to questions and comments.

As far as the determination of mitigation effectiveness is concerned, within the context of the compliance reporting framework outlined in Section 25.2 annual reports will compiled, can be made available to CEAA.