



KEMESS MINE 2024 ANNUAL IAAC REPORT

*Canadian Environmental
Assessment Act, 2012*



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EXECUTIVE SUMMARY

AuRico Metals Inc., a wholly own subsidiary of Centerra Gold Inc., obtained the Canadian Environmental Ministers Decision Statement on March 13, 2017 for the Kemess Underground Mine (KUG), an underground mine located in the mountains of north-central British Columbia (BC), 430 kilometres northwest of Prince George. The Implementation Schedule was provided to Aboriginal groups and the Impact Assessment Agency of Canada (IAAC) in 2017. Construction activities (road building, clearing, etc.) for the Kemess Underground Project Commenced July 16, 2018. In 2020, construction of the KUG project was paused and Kemess Mine was put into care and maintenance.

At the mine site, fish and fish habitat protection continued to be achieved through the implementation of erosion and sediment control (ESC) techniques as part of our care and maintenance phase of the project. No instream works occurred and no potentially acid-generating material or tailings were produced in 2024. Runoff water from the East Pit Quarry continued to report to the Kemess Underground (KUG) tailings storage facility (TSF). All water that reports to the Mine Site Water Management Area was pumped back to the KUG TSF. In addition, the inlet to the SCSP via the Western Collection Ditch was improved to ensure flows report to SCSP and pumped to the KUG TSF. In addition to adhering to Fisheries Act requirements, AuRico carried out provincially required effluent monitoring and implemented the Mine Site Water Management Plan and Selenium Management Plan in 2024.

In 2024, discharge from the KUG TSF was re-initiated to Attichika Creek, which occurred between May 5 to May 10 and June 2 to October 22. The annual Fish and Aquatic Effects Monitoring Plan was carried out and showed no change to most environmental components of Attichika Creek in 2024 at the diffuser discharge location with the exception of benthic invertebrates. The monitoring program found no far-field environmental effects from the project in 2024. Metals concentrations in benthic invertebrate and bull trout tissue in Attichika Creek remained stable compared to pre-discharge levels, and selenium tissue concentrations remained below the provincial guideline for the Protection of Aquatic Life (4 mg/kg dry weight). Mercury concentrations in Bull Trout tissue remained above the provincial guideline but are not increasing and are similar to fish in non-mine influenced lakes in the region. The annual adult bull trout survey found the highest redd count within Kemess Creek since the study was first implemented in 1994. Additionally, the combined average density of juvenile bull trout parr and char fry was similar to or higher than the long-term average across all reaches in Kemess Creek and Attichika Creek.

Consistent with previous monitoring years, selenium concentrations remained elevated above provincial guidelines in water, sediments, and biota of Waste Rock Creek, though are showing a decline in most cases due to mitigation and water management efforts employed on the mine site. A bypass was noticed by the inlet of the SCSP which caused the higher levels of selenium within Waste Rock Creek, the bypass has since been fixed and monitored frequently. Annual Selenium Management Plan monitoring found that despite elevated selenium concentrations, substantive effects on benthic and periphyton community productivity or composition were not observed in Waste Rock Creek.

The Mine continued to implement the Wildlife Management and Monitoring Plan which included employee observation and camera monitoring of wildlife within the project footprint. There were no incidental observations of bats throughout the project in 2024 and no evidence of bats using roosting structures built by the mine. No vegetation was cleared on-site during 2024. As a result, no furbearer dens or migratory bird nests surveys were needed in 2024. There were no wildlife mortalities due to mine-related activities in 2024. Monitoring of migratory birds occurred in 2024 and indicated healthy populations of barn, cliff, and tree swallows nesting on project infrastructure during care and maintenance. During all snow-laden months in 2024, the Omineca Resource Access Road (ORAR) was not kept open; therefore, there was no need for monitoring to ensure safe passage of ungulates exiting plowed roads. Kemess continued to uphold a policy of no fishing, hunting, and trapping within the Project area.

The Independent Environmental Monitor completed three desktop inspections for the project in 2024. No onsite inspections occurred due to weather restricting travel when inspections were scheduled.

RÉSUMÉ

AuRico Metals Inc., une filiale en propriété exclusive de Centerra Gold Inc., a obtenu la Déclaration de Décision des Ministres de l'Environnement du Canada le 13 mars 2017 pour la mine souterraine de Kemess (KUG), une mine souterraine située dans les montagnes du centre-nord de la Colombie-Britannique (CB), à 430 kilomètres au nord-ouest de Prince George. Le calendrier de mise en œuvre a été transmis aux groupes autochtones et à l'Agence d'évaluation d'impact du Canada (AEIC) en 2017. Les activités de construction (construction de routes, déblayage, etc.) pour le projet Kemess Underground ont commencé le 16 juillet 2018. En 2020, la construction du projet KUG a été interrompue et la mine de Kemess a été mise en phase d'entretien et en maintenance.

Sur le site minier, la protection des poissons et de leurs habitats a continué d'être assurée par la mise en œuvre des techniques de contrôle de l'érosion et des sédiments (ESC) dans le cadre de la phase de soins et de maintenance du projet. Aucun travail en cours d'eau n'a eu lieu et aucun matériau potentiellement générateur d'acide ni résidus n'ont été produits en 2024. L'eau de ruissellement provenant de la carrière de la fosse Est a continué à être dirigée vers l'installation de stockage des résidus (TSF) de Kemess Underground (KUG). Toute l'eau qui se dirige vers la zone de gestion de l'eau du site minier a été pompée vers le TSF de KUG. De plus, l'entrée du SCSP via le fossé de collecte occidental a été améliorée pour garantir que les flux arrivent au SCSP et sont pompés vers le TSF de KUG. En plus de respecter les exigences de la Loi sur les pêches, AuRico a effectué une surveillance des effluents requise au niveau provincial et a mis en œuvre le Plan de gestion de l'eau du site minier et le Plan de gestion du sélénium en 2024.

En 2024, le rejet du TSF de KUG a été réactivé vers le ruisseau Attichika, entre le 5 mai au 10 mai et du 2 juin au 22 octobre. Le Plan de surveillance des effets sur les poissons et les milieux aquatiques a été réalisé et n'a montré aucun changement pour la plupart des éléments environnementaux du ruisseau Attichika en 2024 au niveau de l'emplacement du diffuseur, à l'exception des invertébrés benthiques. Le programme de surveillance n'a trouvé aucun effet environnemental éloigné du projet en 2024. Les concentrations métalliques dans les tissus d'invertébrés benthiques et d'omble à tête plate dans le ruisseau Attichika sont restées stables par rapport aux niveaux avant le rejet, et les concentrations de sélénium dans les tissus sont restées inférieures à la norme provinciale pour la protection de la vie aquatique (4 mg/kg poids sec). Les concentrations de mercure dans les tissus d'omble à tête plate sont restées au-dessus de la norme provinciale, mais elles n'augmentent pas et sont similaires à celles des poissons dans des lacs non influencés par les mines dans la région. L'enquête annuelle sur les omble à tête plate adultes a trouvé le plus grand nombre de nids dans le ruisseau Kemess depuis le début de l'étude en 1994. De plus, la densité moyenne combinée des jeunes parr d'omble à tête plate et des alevins d'omble était similaire ou supérieure à la moyenne à long terme dans toutes les sections du ruisseau Kemess et du ruisseau Attichika.

Conformément aux années précédentes de surveillance, les concentrations de sélénium sont restées élevées au-dessus des normes provinciales dans l'eau, les sédiments et la biote du

ruisseau Waste Rock, bien qu'une diminution soit observée dans la plupart des cas grâce aux efforts de réduction des impacts et à la gestion de l'eau mis en œuvre sur le site minier. Un contournement a été observé près de l'entrée du SCSP, ce qui a provoqué des niveaux plus élevés de sélénium dans le ruisseau Waste Rock, mais ce contournement a depuis été corrigé et surveillé fréquemment. La surveillance annuelle du Plan de gestion du sélénium a révélé que malgré des concentrations élevées de sélénium, aucun effet substantiel sur la productivité ou la composition des communautés benthiques et de periphyton n'a été observé dans le ruisseau Waste Rock.

La mine a continué à mettre en œuvre le Plan de gestion et de surveillance de la faune, qui comprenait l'observation des employés et la surveillance par caméra de la faune dans la zone du projet. Il n'y a pas eu d'observations accidentelles de chauves-souris pendant le projet en 2024, et aucune preuve d'utilisation des structures de gîte construites par la mine n'a été trouvée. Aucune végétation n'a été déblayée sur le site en 2024. Par conséquent, aucune enquête sur les terriers de mammifères à fourrure ou les nids d'oiseaux migrateurs n'a été nécessaire en 2024. Il n'y a eu aucune mortalité de faune due aux activités liées à la mine en 2024. La surveillance des oiseaux migrateurs a eu lieu en 2024 et a indiqué des populations saines de hirondelles rustiques, à front blancs et bicolores nichant sur l'infrastructure du projet pendant la phase de soins et de maintenance. Pendant tous les mois chargés de neige en 2024, la route d'accès aux ressources d'Omineca (ORAR) n'a pas été maintenue ouverte ; il n'y avait donc pas de besoin de surveillance pour assurer un passage sûr des ongulés sortant des routes déneigées. Kemess a continué de maintenir une politique d'interdiction de la pêche, de la chasse et du piégeage dans la zone du projet.

Le surveillant environnemental indépendant a effectué trois inspections de bureau pour le projet en 2024. Aucune inspection sur site n'a eu lieu en raison des restrictions de voyage dues aux conditions météorologiques lorsque les inspections étaient programmées.

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1. Introduction

AuRico Metals Inc. (AuRico) is a wholly owned subsidiary of Centerra Gold, which operates the Kemess Project. The Kemess Mine is located in north-central British Columbia, 430 kilometers northwest of Prince George in the Peace River Regional District. The closest communities to the Project by air are Kwadacha (also known as Fort Ware; 79 km), Tsay Keh (111 km), and Takla Landing (182 km). The Kemess South (KS) complex consists of a previously operated open pit mine, processing mill and various ancillary support facilities, including maintenance shops and housing for 400 full-time employees during operations. The KS mine ceased operations in 2011 and entered a state of care and maintenance. The Kemess Underground (KUG) Project is an approved but yet to be constructed 37,500 tonne per day copper and gold mine with a 17-year mine life. The KUG Project is designed to utilize the existing KS facilities, as well as newly constructed infrastructure. Construction of KUG began in 2018. In 2020, construction of the KUG project was paused and Kemess Mine was put into care and maintenance. In 2022, the BC Environmental Assessment Office granted the project substantially started status. This determination preserves the Provincial Environmental Assessment Certificate for the life of mine while the site remains in care and maintenance.

AuRico received both a BC Environmental Assessment Certificate (#M17-01) and a Canadian Environmental Ministers Decision Statement on March 9, 2017. All provincial and federal authorizations required to construct the mine have been received. Initial surface construction activities began at the Kemess Mine on July 16, 2018. An amended Federal Decision Statement was issued on January 26, 2021.

This report has been developed to meet Decision Statement Condition 2.9: *“the Proponent Shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report”*. The report is laid out such that each heading addresses an annual reporting requirement defined within the subheadings of Condition 2.9. Namely for Condition 2.9.3, the report identifies conditions which required consultation and how the Proponent (AuRico) has considered the views and information received as per the requirements set out in Condition 2.2.

2. General conditions

2.1 The Proponent shall ensure that its actions in meeting the conditions set out in the Decision Statement are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including community and Indigenous traditional knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applies the best available economically achievable technologies.

The following sections identify the Decision Statement conditions that required consultation and how the Proponent has considered the views and information received as per the requirements set out in Conditions 2.2 to 2.14.

2.2 The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:

2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;

2.2.2 provide sufficient information on the scope and the subject matter of the consultation and a reasonable period of time to permit the party or parties being consulted to prepare their views and information;

2.2.3 provide a full and impartial consideration of any views and information presented by the party or parties being consulted on the subject matter of the consultation; and

2.2.4 advise in a timely manner the party or parties being consulted on how their views and information have been considered by the Proponent.

2.3. The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner by which to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to be provided when seeking input, the process for full and impartial consideration of any views and information presented on the subject of the consultation, and the means by which Indigenous groups will be informed of how their views and information have been considered by the Proponent.

2.4. The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of the follow-up program and in consultation with Indigenous groups and relevant authorities, the following information, for each follow-up program:

2.4.1. the methodology, location, frequency, timing, and duration of monitoring associated with the follow-up program as well as the scope, content, and frequency of reporting of the follow-up results;

2.4.2. the levels of environmental change relative to established baseline conditions

that would require the Proponent to implement additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and

2.4.3. the range of technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.4.2 have been reached or exceeded.

2.5. The Proponent shall submit the information referred to in condition 2.4 to the Agency prior to the implementation of a follow-up program. The Proponent shall update that information in consultation with Indigenous groups and relevant authorities during the implementation of the follow-up program, and shall provide the updated information to the Agency, Indigenous groups, and relevant authorities within 30 days of the information being updated.

2.6. The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:

2.6.1. conduct the follow-up program according to the information determined pursuant to condition 2.4;

2.6.2. undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);

2.6.3. determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.6.2; and

2.6.4. if modified or additional mitigation measures are required pursuant to condition 2.6.3, develop and implement the modified or additional mitigation measures in a timely manner and monitor them pursuant to condition 2.6.2.

2.7. Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for the participation of that Indigenous group in the implementation of the follow-up program, including the analysis of the follow-up results and whether modified or additional mitigation measures are required, as set out in condition 2.6.

2.8. The Proponent shall follow the consultation process outlined in conditions 2.3, 2.4, 2.5, and 2.7 when consulting Gitxsan Wilp Nii Kyap for the purpose of conditions 3.7 and 9.5.

2.9. The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:

2.9.1. the activities undertaken in the reporting year to comply with each of the conditions set out in this Decision Statement;

2.9.2 how the Proponent complied with condition 2.1;

2.9.3. for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;

2.9.4. the information referred to in conditions 2.4 and 2.5 for each follow-up program;

2.9.5. the results of the follow-up program requirements identified in conditions 3.7, 4.3, 5.1, 6.10, and 6.11; and

2.9.6. any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.6.

2.10. The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including an executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.

2.11. The Proponent shall publish on the Internet, or any medium which is widely publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10, the reports related to accidents and malfunctions referred to in conditions 9.4.3 and 9.4.4, the communication plan referred to in condition 9.5, the implementation schedule referred to in condition 10.1, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available throughout construction and operation and until the end of decommissioning. The Proponent shall notify the Agency, Indigenous groups, and Gitxsan Wilp Nii Kyap of the availability of these documents upon publication.

2.1.2. The Proponent shall notify the Agency and Indigenous groups in writing no later than 60 days after the day on which there is a transfer of ownership, care, control, or management of the Designated Project in whole or in part.

2.1.3. The Proponent shall consult with Indigenous groups prior to initiating any material change(s) to the Designated Project that may result in adverse environmental effects, and shall notify the Agency in writing no later than 60 days prior to initiating the change(s).

2.1.4. In notifying the Agency pursuant to condition 2.13, the Proponent shall provide the Agency with a description of the potential adverse environmental effects of the change(s) to the Designated Project, the measures proposed to be implemented by the Proponent to mitigate adverse environmental effects, and the results of the consultation with Indigenous groups.

AuRico and the Tsay Keh Dene, Kwadacha, and Takla Lake First Nations (TKN) have a collaboration framework for the project espoused within the 2017 Impact Benefit Agreement (IBA). In 2024, consultation and engagement activities included, but were not limited to, meetings with the Environmental Management Committee (EMC), sharing of all external reports and project management plans, collaboration on non-compliances, consultation in updating management

plans, facilitating third party technical reviews for relevant plans and documents, retaining Environmental Monitors from the Nations to work on site, and publishing an annual newsletter. There were four quarterly meetings with the EMC, including a full-day in-person meeting hosted by AuRico in Q3, unfortunately weather did not allow travel to the site for the scheduled meeting. The meeting included two TKN members who drove in, followed by a virtual meeting later in the day with all attendees. The EMC also convened special meetings on topics such as selenium management. The TKN EMC was extensively engaged in updating the Fish and Aquatic Effects Monitoring Plan which pertains to condition 3.7 of this Decision Statement.

In 2023, AuRico signed a relationship agreement with the Gitxsan Wilp Nii Gyap First Nation. AuRico has established an Environmental Working Group with Nii Gyap and held one meeting in 2024. A Gitxsan Environmental Monitor has been retained onsite per the relationship agreement. This framework will facilitate collaboration on Project activities and environmental matters. AuRico updated the Fish and Aquatic Effects Monitoring Plan in consultation with Nii Gyap, which pertains to condition 3.7 of this Decision Statement.

3. Condition 3: Fish and Fish Habitat

3.1. Condition 3.1

The Proponent shall implement erosion and sedimentation control measures within the Project area during all phases of the Designated Project to avoid the deposit of deleterious substances in water frequented by fish.

As per the Erosion Prevention and Sediment Control Plan, erosion and sediment control (ESC) techniques were implemented as part of KUG care and maintenance activities in 2024. There were ongoing stabilization earthworks performed in the Kemess Lake Valley (KLV) throughout the year, as well repairs to existing ESC measures. At the Kemess South Tailings Storage Facility, ESC measures including silt fences, road drainage bars, and check dams were used to mitigate erosion triggered by rain events. Hydroseeding of the SP27 seepage capture ditch and adjacent Western Collection Ditch was completed in summer of 2024. Riprap and check dams were installed in the Western Collection Ditch to mitigate erosion. Elsewhere, routine maintenance on roads, the airstrip and other surfaces continued as needed to protect against erosion and subsidence. All water that reports to the mine site water management area (MSWMA) is either pumped to the KUG Tailings Storage Facility (TSF) or flows to sediment settling features (i.e. settling ponds, check-dams) prior to release into the receiving environment.

Settling ponds were successful in reducing sediment transport within the MSWMA, verified by in-situ turbidity measurements at discharge points and routine samples for total suspended solids.

3.2. Condition 3.2

The Proponent shall, taking into consideration Fisheries and Oceans Canada's Measures to Avoid Causing Harm to Fish and Fish Habitat Including Aquatic Species at Risk, implement mitigation measures when conducting Designated Project activities to avoid causing harm to fish and fish habitat, including timing work in or around water to respect the timing windows identified to protect fish.

No in-stream works were conducted during the reporting period. To facilitate access to drill pads in the Kemess North area, a helicopter was utilized. This ensured avoidance of fish and fish habitat disturbance in Central Cirque Creek when accessing the drill pad.

3.3. Condition 3.3

The Proponent shall comply with the Metal Mining Effluent Regulations and subsection 36(3) of the Fisheries Act regarding the deposit of effluent from the Designated Project in water frequented by fish, taking into account the Canadian Council of Ministers of the Environment's Water Quality Guidelines for the Protection of Aquatic Life, from the start of construction to the end of decommissioning. In doing so, the Proponent shall:

3.3.1 place all acid-generating and potentially acid-generating material into the tailings

storage facility and submerge all such materials placed in the tailings storage facility under a permanent water cover; and

During construction activities at the Kemess Mine in 2018, all acid-generating and potentially acid-generating material was deposited into the KUG TSF under a permanent water cover. In 2024, there was no production, movement, or disturbance of any acid-generating or potentially acid-generating material.

3.3.2 collect and treat all waters affected by the Designated Project that do not meet the requirements of the Metal Mining Effluent Regulations and subsection 36(3) of the Fisheries Act, as applicable, prior to the affected waters being deposited in waters frequented by fish.

The site currently holds recognized closed mine status following the completion of Environmental Effects Monitoring programs for Kemess South, and as such is not subject to Metal and Diamond Mining Effluent Regulation (MDMER) requirements. Water quality sampling will take place as per the MDMER and the *Fisheries Act*, when production throughput re-triggers that requirement, and will be conducted in accordance with the Canadian Council of Ministers of the Environment's Water Quality Guidelines for the Protection of Aquatic Life.

In addition to *Fisheries Act* requirements, Kemess is subject to the BC Environmental Management Act for all discharges from the mine site (reported under separate cover in the annual effluent report). Water quality sampling and toxicity testing occurs in accordance with these requirements to ensure that the environment is protected. AuRico adheres to its Mine Site Water Management Plan and Selenium Management Plan to direct water management activities in accordance with industry best practices. The site uses a combination of source control, contact water capture, clean water diversions, and where necessary water treatment to ensure water is discharged in compliance with all applicable limits.

In 2024, all the water collected by the Southern Collection System Pond (SCSP) was pumped to the KUG Tailings Storage Facility (KUG TSF) for containment.

3.4. Condition 3.4

The Proponent shall install hydraulic plugs in the declines before the underground mine is flooded to direct seepage from the flooded underground mine towards East Cirque Creek.

Construction of the underground mine has not started, and hydraulic plugs will be implemented at the time of flooding.

3.5. Condition 3.5

The Proponent shall, in a manner that complies with the Metal Mining Effluent Regulations and subsection 36(3) of the Fisheries Act, discharge water from the tailings storage facility into

Attichika Creek during construction and the first year of operation such that flow rates downstream of the discharge location are within the range of minimum and maximum flow rates naturally occurring in Attichika Creek, and shall only discharge water into Attichika Creek during open water months.

Discharge into Attichika Creek in 2024 from the KUG TSF occurred in accordance with the limits and dilution ratios stipulated in EMA Permit 15335 to protect aquatic life. Discharge only occurred during open water months. In 2024, discharge from the KUG TSF was re-initiated to Attichika Creek, which occurred from May 5 to May 10 and June 2 to October 22. Hydrometric monitoring in Attichika Creek was conducted continuously to confirm that KUG TSF discharge did not substantially alter flow from ambient conditions in Attichika Creek. KUG TSF discharge was reduced accordingly to comply with this requirement. Complete information is contained in the Environmental Management Act Annual Environmental Report.

3.6. Condition 3.6

The Proponent shall divert all runoff from the East Pit quarry into the Kemess Underground tailings storage facility during construction and operation.

Runoff from the East Pit Quarry drainage reports directly into the KUG TSF via existing drainage ditches. Most flow is captured by gravity, and the rest is collected in a ditch that reports to Dump Pond 1, which is then pumped to the KUG TSF. No additional measures or works were implemented in 2024. Monitoring of the drainage pattern from the East Pit Quarry will continue through the construction and operations phases of the mine life in accordance with the Mine Site Water Management Plan.

3.7. Condition 3.7

The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Gitksan Wilp Nii Kyap, and relevant authorities, and implement, from the start of construction to the end of decommissioning, a follow-up program to verify the accuracy of the environmental assessment as it pertains to fish and fish habitat and to determine the effectiveness of mitigation measures referred to in conditions 3.1 to 3.6.

AuRico Metals submitted its permit application to the Major Mines Permitting Office (MMPO) on August 31, 2017. Prior to the official permit application submission, AuRico Metals consulted with TKN on the development of a Fish and Aquatic Effects Monitoring Plan (FAEMP), a Wildlife Management and Monitoring Plan (WMMP), and a Mine Site Water Management Plan (MSWMP); circulating draft copies of these plans on June 30, 2017, which was 60 days in advance of the official permit application submission. These plans were developed in consideration of Condition 3.7. AuRico and TKN continued to consult on management plans throughout the permitting process and established collaboration and consultation methods espoused within the 2017 Impact Benefit Agreement (IBA).

During the permitting process, TKN, via their consultants at Environment Dynamics Incorporated (EDI), provided feedback on fish and fish habitat. TKN comments focused on the Selenium Management Plan (SeMP), which outlines selenium monitoring, as well as mitigation measures for capturing flows with elevated selenium and addressing potential flow reduction in Waste Rock Creek.

Provincially-mandated aquatics monitoring occurs annually in Waste Rock Creek, Attichika Creek, and Kemess Creek. In 2024, as per instruction from ENV, AuRico finalized updates to the FAEMP in collaboration with the Tse Keh Nay (TKN) Environmental Management Committee and Gitxsan Wilp Nii Kyap Environmental Working Group. On January 9 2025, the revised plan was also distributed to IAAC and Department of Fisheries and Oceans, as it is intended to satisfy condition 3.7 of the decision statement.

As part of the follow-up program, the Proponent shall:

3.7.1 monitor quality of water discharged in Attichika Creek during the dewatering of the Kemess South Pit and treat that water to meet the requirements of subsection 36(3) of the Fisheries Act;

In 2024, discharge from the KUG TSF was re-initiated to Attichika Creek, which occurred between May 5 to May 10 and June 2 to October 22. Monitoring occurred in accordance with the FAEMP and Provincial Effluent Permit requirements.

Results from the 2024 FAEMP Study in Attichika Creek showed that at the effluent discharge location, condition of water quality, sediment quality, periphyton communities, and fish tissue concentrations remained within pre-discharge levels. While changes to benthic invertebrate abundance, composition, and diversity were noted in 2024 at the effluent outfall compared to previous years, the effect was not observed at the far-field exposure station. Compiled together, the results of the 2024 aquatic monitoring programs suggest that the effects of mine activities through the studied pathways are isolated to near-field environments.

3.7.2 monitor surface water quality in Amazay Lake and groundwater movement between the subsidence zone identified by the Proponent during the environmental assessment and Amazay Lake;

The Amazay Lake Monitoring Plan is a subset of the FAEMP. It will be triggered by the restart of construction, which will include the requirement to monitor surface water quality and groundwater quantity entering the lake through operations and closure as detailed in the Mine Site Water Management Plan. Given the unlikely, but potential impact to fish and aquatic biota, Amazay Lake water quality data would be used to trigger an Adaptive Management Monitoring Program as required. A baseline characterization of Amazay Lake and Amazay Creek was conducted in September 2019. Beyond the initial baseline monitoring, this Amazay Lake biological monitoring program will only be implemented when routine water quality monitoring from the Amazay Lake

Monitoring Plan initiates a trigger response. This biological monitoring program will then occur annually in the fall until results-based rationale to discontinue the program are available and accepted by regulators. The monitoring program consists of benthic invertebrates, fish tissue analysis (using resident rainbow trout, given they are more abundant than Dolly Varden and mountain whitefish in the lake), and supporting water quality and sediment quality results.

3.7.3 monitor changes in channel form and sediment load downstream of the discharge location in Attichika Creek;

Sediment quality samples and substrate characterization for channel form are conducted annually in Attichika Creek as part of the FAEMP. Fish monitoring in Attichika Creek has shown that there is no direct evidence that juvenile fish were avoiding habitats within a short distance downstream from the active diffuser.

3.7.4 monitor changes in water quality in Waste Rock Creek and the tailings storage facility, including changes in selenium concentrations;

Routine monitoring prescribed by the EMA permit 15335, and annual aquatics monitoring prescribed by the Selenium Management Plan are designed to evaluate environmental effects downstream of the legacy Kemess South Waste Rock Storage Facility. Water-borne selenium concentrations in Waste Rock Creek, during winter months, remain elevated above background levels at most stations downstream of the Kemess South Waste Rock Storage Facility, although are greatly improved since operations years as a result of mitigation actions employed by the mine. Selenium concentrations were substantively less in the Attichika wetlands relative to upper Waste Rock Creek sampling stations. The results of these studies and routine monitoring are discussed in the FAEMP.

3.7.5 monitor the presence and use of spawning habitat by bull trout (Salvelinus confluentus) and rainbow trout (Oncorhynchus mykiss) downstream of the discharge location in Attichika Creek prior to and after the installation of the discharge pipeline into Attichika Creek. The Proponent shall offset any loss of spawning habitat for bull trout (Salvelinus confluentus) and rainbow trout (Oncorhynchus mykiss) in Attichika Creek if monitoring results show that spawning habitat loss has occurred;

A targeted bull trout telemetry study was conducted between 2017 and 2021 to assess fish movements before and after installation of the effluent diffuser. In 2024, Chu Cho Environmental conducted the annual fish studies and found record number of Redd counts and strong samples of healthy bull trout downstream of the diffuser. This reinforces the understanding that channel form and sediment load remain unchanged or have improved from previous years. This also reinforces that there is no loss of spawning habitat for bull and rainbow trout downstream of the discharge location in Attichika Creek. During redd surveys, the fish habitat is also characterized to assess for potential barriers to fish movement or changes in habitat quality over time. Continuous logging of temperature data supplements visual observations.

3.7.6 monitor contaminants, including mercury, in the tissue of fish species harvested by Indigenous groups in Thutade Lake, including bull trout (Salvelinus confluentus)

Non-lethal tissue sampling of Attichika Creek bull trout continues annually as part of the FAEMP. In 2024, 12 individuals were captured for sampling. Selenium and mercury concentrations in tissue were like those measured in previous years of monitoring for the Project which suggests that effluent is not causing elevated metals concentrations to occur. Selenium tissue concentrations remain consistently below the BC Water Quality Guideline (BCWQG) for protection of aquatic life of 4 mg/kg DW. Mercury tissue concentrations remained above the BCWQG for protection of aquatic life of 0.033 mg/kg WW, though this is consistent with mercury concentrations in other local lakes that are not exposed to mine activities. This suggests that mercury levels may be naturally elevated in fish communities of the area; particularly in large, piscivorous fish such as Thutade Lake bull trout.

4. Condition 4: Migratory Birds

4.1. Condition 4.1

The Proponent shall carry out Designated Project activities in a manner that protects migratory birds and avoids harming, killing, or disturbing migratory birds or destroying, disturbing, or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Avoidance Guidelines. The Proponent's actions in applying the Avoidance Guidelines shall be in compliance with the Migratory Birds Convention Act, 1994 and with the Species at Risk Act.

No vegetation clearing work was completed within the project footprint in 2024 and no disturbance to migratory birds occurred as a result of project activities.

4.2. Condition 4.2

The Proponent shall deter migratory birds from accessing the tailings storage facility and seepage ponds until water quality is not harmful to migratory birds.

The KUG Project has not entered into the operations phase and no tailings have been deposited into the KUG TSF. Use of the KUG TSF and seepage ponds by migratory birds was monitored throughout the 2024 reporting year as part of the on-site wildlife reporting. No instances of birds accessing or inhabiting the KUG TSF or seepage ponds were reported in 2024. Monitoring for use by migratory birds will continue in 2024 and deterrent(s) will be implemented as necessary.

4.3. Condition 4.3

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 and 4.2. The Proponent shall implement the follow-up program from the start of construction to the end of decommissioning.

Bi-weekly surveys of infrastructure potentially used by barn swallows for nesting during the breeding season were completed in accordance with the Wildlife Management Plan. These surveys showed that both barn and tree swallows preferred the Accommodations area for nesting, possibly due to availability of more open-sheltered areas to protect their nests. In comparison, it was noted that tree swallows nested on higher abandoned buildings, where the swallows were able to access old air intakes. Cliff swallows preferred to nest around the Mill area, where the conveyor is located approximately 80 meters from the ground, as it appears that these swallows prefer the high areas on-site to protect their nests from predators.

Please refer to the 2024 Annual Reclamation Report for more information, which has the nest data per location for each swallow type and description of monitoring methods utilized.

5. Condition 5: Human Health

5.1. Condition 5.1

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse effects on the health of Indigenous Peoples caused by changes in concentrations of contaminants of potential concern identified during the environmental assessment in air, soil, water, and sediment. The Proponent shall implement the follow-up program during construction and operation. As part of the development of the follow-up program, the Proponent shall:

5.1.1 identify levels of environmental change relative to established baseline conditions for contaminants of potential concern that would require the Proponent to implement modified or additional mitigation measure(s) to mitigate increased risks to human health; and

5.1.2 if monitoring results demonstrate that concentration levels for contaminants of potential concern are greater than the identified levels of environmental change, update the human health risk assessment for the consumption of traditional foods exposed to these contaminants and communicate the results of the updated human health risk assessment to Indigenous groups.

AuRico circulated the proposed Human Health Follow-up Program to TKN via email on March 20, 2018. A reminder of requests for feedback was discussed at the April 20, 2018 EMC meeting. To date no comments have been received.

As per Section 4.4 of the Human Health Follow-up Program and Section 3.4 of the Ecosystem Management Plan, soil and vegetation sampling was conducted in 2022. Vegetation used by wildlife for forage was targeted, including sedges, lichens, and willows. Soil and vegetation were sampled on-site in different areas exposed to industrial activities, as well as at non-impact control sites. The soil and vegetation were analyzed for trace metal uptake. The soil sample results were compared to both CCME and BC Contaminated Site Regulation soil quality guidelines. The vegetation sample results at exposure sites were compared to the non-impact control sites using statistical analyses. Metal concentrations in soil were above guidelines in the KUG area (yet to be developed) and in the Kemess South area (previously impacted), however this likely reflects background concentrations for these areas. Importantly, uptake of metals in vegetation compared well with reference sites, indicating no adverse uptake in plants or risk to flora, fauna, and people. Average metal concentration in soil and vegetation at the ORAR sites were below the guidelines.

This sampling was conducted to match the frequency of the Reclamation and Closure Plan update, which also occurred in 2022.

6. Condition 6: Current Use of Lands and Resources for Traditional Purposes

6.1. Condition 6.1

*The Proponent shall install and maintain, during construction and operation, ramps every 100 to 300 metres over the discharge line between the tailing storage facility and Attichika Creek to provide passage for moose (*Alces alces*), woodland caribou (*Rangifer tarandus caribou*), grizzly bear (*Ursus arctos*), and furbearers. The Proponent shall identify the locations of ramps in consultation with Indigenous groups and relevant authorities.*

The discharge line between the KUG TSF and Attichika Creek was installed in 2018. As the entire discharge line was buried at the time of installation, wildlife access has never been impeded, thereby removing the need for installation of ramps.

6.2. Condition 6.2

The Proponent shall create and maintain, during construction and operation, escape pathways along all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road, to allow ungulates to exit the plowed roads. The Proponent shall identify the locations of escape pathways in consultation with Indigenous groups and relevant authorities.

During winter, snowbank breaks are created every 300 meters adjacent from each other along mine roads to allow movement of wildlife. During all snow-laden months in 2024, the Omineca Resource Access Road (ORAR) was not maintained or plowed; therefore, there was no need for monitoring to ensure safe passage of ungulates exiting plowed roads.

In the spring, summer and fall of 2024, a contractor was retained as per the TKN IBA to complete brushing and road maintenance on the ORAR.

6.3. Condition 6.3

The Proponent shall, from the start of construction to the end of decommissioning, remove carrion within 24 hours of its discovery by the Proponent from all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road.

Carrion observed by AuRico staff and contractors in 2024 were limited to one porcupine, one raven, one fox and one ptarmigan. All were clear of Project roads and presumed deceased due to predation or natural causes. Carrion monitoring and removal will continue through the life of mine to the end of decommissioning. As per the Wildlife Management and Monitoring Plan (WMMP), Kemess tracked incidental wildlife occurrences on the mine site and also on the ORAR corridor. All wildlife observations by Kemess staff and contractors were communicated to the Kemess environmental department via in-person communication, radio communication, or self-documentation. Employees have always been encouraged to submit photos along with the

location, date and time of observation to help confirm the ID of the species and track movement. A summary of wildlife observations is under separate cover in the 2024 Annual Reclamation Report.

6.4. Condition 6.4

The Proponent shall prohibit employees and contractors associated with the Designated Project from fishing, hunting, and trapping within the Project Area, unless an employee or a contractor is provided access by the Proponent for traditional purposes or for exercising Aboriginal rights, to the extent that such access is safe.

As per condition 6.4, AuRico created the No Fishing, Hunting and Gathering Policy on June 29, 2018, which is reviewed as part of the new worker mine site orientation. The Kemess Mine Fishing and Hunting Policy is designed to ensure safety of Kemess Mine personnel, contractors and the general public in the Kemess Mine area, as well as for the protection of fish, wildlife and plant resources at the mine. The policy defines that hunting, fishing or trapping, mushroom, berry picking, or the gathering of plants is not permitted by mine personnel or contractors at the mine site at any time. The policy is communicated to all employees at the Kemess Mine when undergoing mine site orientation. Supplementary signage is posted at site entrances displaying the policy.

6.5. Condition 6.5

The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, conduct pre-clearing surveys to identify Western toad (Anaxyrus boreas) breeding habitat, and shall implement measures to mitigate the loss of Western toad (Anaxyrus boreas) breeding habitat caused by the Designated Project.

Prior to the official permit application submission, AuRico consulted with Tse Keh Nay (TKN) on the development of the WMMP. To date, no comments on the western toad pre-clearing surveys have been received. AuRico and TKN continue to consult on management plans and follow up program development through established collaboration and consultation methods espoused within the 2017 IBA.

AuRico, through its joint EMC with TKN, discusses plans for any major pre-clearing surveys and the subsequent results with TKN.

Pre-clearing bird, furbearers and amphibian surveys were not conducted in 2024 as no vegetation clearing or construction work was done in 2024.

6.6. Condition 6.6

The Proponent shall conduct pre-clearing surveys to determine the distribution of little brown myotis (Myotis lucifugus) and Northern myotis (Myotis septentrionalis), and establish, in

consultation with Indigenous groups and relevant authorities, buffer zones around active hibernacula and active roosts.

During the permitting process, TKN, via their consultants at Environment Dynamics Incorporated (EDI), provided feedback on the bat pre-clearing surveys, submitting seven questions. TKN comments focused on the methodology used to identify what species of bat were roosting in the area and which roosting structures or nursery bat boxes were actively used.

AuRico conducted initial bat habitat surveys in November of 2017 to inform the initial offsetting requirements for roosting structures. In April, 2018, pre-clearing surveys were conducted prior to construction initiating in July and 35 nursery bat boxes were installed. Surveys of the bat boxes showed only one instance of bat activity at these sites in 2020. KUG construction has since paused and no further disturbance to bat habitat has occurred.

6.7. Condition 6.7

*The Proponent shall install, prior to construction, and maintain, during construction and operation, roosting structures to offset any loss of little brown myotis (*Myotis lucifugus*) and Northern myotis (*Myotis septentrionalis*) roosting habitat.*

In 2024, select bat boxes were rebuilt and repositioned to improve the potential for roosting. In addition to the 35 bat boxes, additional roosting structures will be installed in the event that further habitat loss is anticipated throughout Project construction and operation. Disturbance will only be considered to result in loss of bat habitat if monitoring indicates that bats are present in the area, and if the Project disturbance would result in clearing of suitable roosting habitat for little brown myotis (*Myotis lucifugus*) and northern myotis (*Myotis septentrionalis*).

6.8. Condition 6.8

*The Proponent shall develop and implement a follow-up program to monitor the little brown myotis (*Myotis lucifugus*) and Northern myotis (*Myotis septentrionalis*) usage of buffer zones and roosting structures to determine the effectiveness of the mitigation measures during construction and operation.*

In addition to the monitoring described above, in 2022, liners were placed under the bat boxes to better detect usage during non-hibernating months. There were no observations of guano on the liner in 2024, and there were no incidental observations of bats at the Mine. Given the very limited observation of bats using the bat boxes or in undisturbed habitat on the Project Site, it appears that the potential for presence of bats in the Project area has been over-stated. Additionally, for three years there has been no further disturbance to potential bat habitat and limited anthropogenic activity on site which would deter bat habitation. In 2025, the need for further mitigation of bat habitat will be assessed to determine next steps in accordance with the Wildlife Management and Monitoring Plan.

6.9. Condition 6.9

The Proponent shall, in consultation with Indigenous groups, undertake progressive reclamation of the habitats disturbed by the Designated Project. The Proponent shall use native species when undertaking that progressive reclamation.

Progressive reclamation within the Project footprint is conducted where possible in accordance with the 2022 Reclamation and Closure Plan. The plan prescribes native seed mixes for reclamation works. In 2024, progressive reclamation efforts included hydroseeding along the SP-27 ditch which was constructed in 2023. Maintenance activities included contouring and seeding various exposed slopes prone to erosion around the site.

6.10. Condition 6.10

*The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of hoary marmot (*Marmota caligata*), white-tailed ptarmigan (*Lagopus leucura*), and short-eared owl (*Asio flammeus*) within the subsidence zone identified by the Proponent during the environmental assessment and within a buffer area of 250 metres along the limits of that subsidence zone. The Proponent shall implement the follow-up program during construction and operation.*

AuRico Metals submitted its initial draft permit application to the Major Mines Permitting Office (MMPO) on August 31, 2017. Prior to the official permit application submission, AuRico Metals consulted with TKN on the development of the WMMP and circulated a draft copy of the plan for comment and feedback on June 30, 2018, 60 days in advance of the official permit submission. Permitting and permitting consultation activities with relevant authorities and TKN as part of the Mine Review Committee (MRC) for KUG concluded in Q2 2018. To date, no specific feedback has been received on the subsidence zone follow-up program. AuRico and TKN continue to consult on management plans and follow up program development through the permitting process and established collaboration and consultation methods espoused within the 2017 IBA.

As per the WMMP, field surveys need to be conducted in areas deemed important habitat for the hoary marmot, white-tailed ptarmigan and short-eared owl prior to clearing and/or construction activities in the subsidence zone. Exploration drilling occurred at the subsidence zone in 2024. Field surveys were conducted by a third party company when needed for earth works. No wildlife habitats were disturbed in the installation of drill pads and the subsequent exploration drilling.

Two hoary marmot sightings were recorded within the Subsidence Zone in 2024.

6.11. Condition 6.11

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment

*as it pertains to the effects of changes caused by the Designated Project to the Chase herd of Southern mountain caribou (*Rangifer tarandus caribou*) and the Thudade herd of Northern mountain caribou (*Rangifer tarandus caribou*) on caribou hunting activities for traditional purposes and to determine the effectiveness of the mitigation measures. The Proponent shall implement the follow-up program from the start of construction to the end of decommissioning. As part of the follow-up program, the Proponent shall:*

*6.11.1 monitor, during construction and the first three years of operation, the use by moose (*Alces alces*), woodland caribou (*Rangifer tarandus caribou*), grizzly bear (*Ursus arctos*), and furbearers of the ramps referred to in condition 6.1 and of the escape pathways referred to in condition 6.2; and*

6.11.2 monitor mortality of wildlife on all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road.

Follow up programs for conditions 6.11.1 and 6.11.2 are outlined in sections 6.1 and 6.2, respectively.

As part of the on-site monitoring program, all wildlife sightings observed on the mine site and on the ORAR by Kemess staff and contractors are recorded. In addition, there are game cameras set up at Kemess North, Kemess Lake Valley, Attichika Diffuser, and above the KUG TSF.

For caribou, bear and moose, there were the following sightings on the Kemess Mine site and on the ORAR in 2024: **January:** 12 moose; **February:** 5 moose; **April:** 3 moose; **May:** 10 grizzly bear; 4 moose; 31 caribou; **June:** 32 grizzly bear; 2 moose; 21 caribou; **July:** 3 grizzly bear; 2 moose; 5 caribou; **August:** 7 grizzly bear; 2 moose; 6 caribou **September:** 6 grizzly bear; 2 moose; 1 caribou **October:** 2 grizzly bear; 2 moose; **November:** 5 moose; **December:** 2 moose.

A graph showing the total number of wildlife sightings on the mine site for 2024 is shown in Appendix B.

Mortality of one porcupine, one raven, one fox and one Ptarmigan was observed due to natural predation or natural causes on the mine road.

7. Condition 7: Physical and Cultural Heritage and Structures, Sites, or Things of Historical, Paleontological, or architectural Significance

7.1. Condition 7.1

The Proponent shall, for any previously unidentified archeological structures, sites, or things of historical, archaeological, paleontological, or architectural significance discovered by the Proponent or brought to the attention of the Proponent by an Indigenous group, Gitxsan Wilp Nii Kyap, or another party during any phase of the Designated Project:

- 7.1.1 immediately halt work at the location of the discovery;*
- 7.1.2 have a qualified individual conduct an assessment at the location of the discovery;*
- 7.1.3 inform, forthwith, in writing, Indigenous groups and Gitxsan Wilp Nii Kyap of the discovery, and allow for monitoring by Indigenous groups and Gitxsan Wilp Nii Kyap during archeological work; and*
- 7.1.4 comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring, and safekeeping of previously unidentified archeological structures, sites, or things of historical, archaeological, paleontological, or architectural significance.*

No archaeological finds occurred throughout the course of Project activities in 2024.

In early August 2017, an Archeological Impact Assessment (AIA) of five ancillary development areas to the proposed KUG was conducted to ensure compliance with the Heritage Consultation Act (HCA) prior to any ground altering activities. A total of 70 ha of area was surveyed, 295 tests were excavated, and 15 exposures were inspected. The field crew consisted of Millennia personnel and members of Tsay Keh Dene, Kwadacha, and Takla Lake First Nations.

In 2018, an Archaeological Chance Find Procedure was developed for the Project. It provides a standard operating procedure should heritage sites, not identified during baseline studies, be discovered during Construction or Operations. The Archaeological Chance Find Procedure includes the following steps if personnel suspect archaeological, traditional use, and paleontological materials or human remains are discovered:

- Immediately contact the Environmental Coordinator or Construction Manager to implement a stop work order to reduce/minimize impacts to the site;
- Leave the material in place and protect and/or mark the area around the site, and do not disturb or collect any archaeological, paleontological, heritage materials, or human remains; and
- Report the discovery to their immediate Supervisor.

The General Manager and the Project Archaeologist will also be notified as outlined in the management plan. The Archaeology Branch and local Aboriginal groups/organizations will be advised of the discovery, if necessary. Final mitigation measures will be determined through consultation with the Archaeology Branch.

7.2. Condition 7.2

The Proponent shall not undertake any ground altering activities within 50 metres of the boundaries of archeological sites, unless authorized by relevant authorities.

No ground disturbance occurred in the vicinity of known archaeological sites in the Project footprint in 2024. As per the Heritage Management Plan, all known archaeological sites within 150 m of the Project footprint have been clearly indicated on development maps in relation to the Project footprint components. If construction is occurring within 150 m of a protected heritage site, the site will be flagged or temporarily fenced to serve as a visible barrier. The Kemess Environmental Monitor will monitor for archaeological site impacts or situations where construction activities occur less than 50 m from a site. Should impacts be anticipated or found to have occurred within 50 m of an archaeological site, the Project Archaeologist will be contacted to determine if additional mitigation measures are required. Environment Department staff members will be fully briefed on the HMP and resulting mitigation measures.

During construction activities, the preferred mitigation measure for archaeological sites is avoidance.

8. Condition 8: Independent Environmental Monitor

8.1. Condition 8.1

Prior to the start of construction, the Proponent shall retain the service of an independent environmental monitor, who is a qualified individual as it pertains to environmental monitoring of mining projects in British Columbia, to observe, record, and report on the implementation of the mitigation measures set out in this Decision Statement.

Environmental Dynamics Inc. (EDI) was retained in 2018 as the Kemess Mine independent environmental monitor (IEM). A formal Terms of Engagement Document was submitted to AuRico by EDI in April 2018, and revised in 2022.

EDI (Environmental Dynamics Inc.) was retained as IEM throughout the 2024 reporting period. EDI completed three desktop inspections for the project in 2024. EDI was scheduled for a site visit in September but due to inclement weather travel to site was cancelled.

8.2. Condition 8.2

The Proponent shall give the independent environmental monitor the authority to stop Designated Project activities that do not comply with the conditions set out in this Decision Statement.

As per the IEM Terms of Engagement document, the IEM has the authority to stop work and will keep record of all stop work orders where works are resulting in, or are at imminent risk of, causing material environmental damage, in accordance with the Decision Statement and applicable legislation.

A Stop Work Order may be issued under two circumstances:

- In the event where an environmental incident, or where the completion of works at or in proximity to the location of the incident, has the potential to cause material unauthorized environmental impacts.
- In the event that a lack of compliance with the Certificate conditions, authorizations/permits and management plans has the potential to cause unauthorized adverse material environmental effects and previous communications with the responsible parties have not led reasonable corrective action.

Under both circumstances, the IEM will inform the responsible parties, EAO, IAAC and the Proponent of the issue within 24 hours and provide rationale and high-level options/considerations for achieving compliance as soon as possible. A recommendation to lift the stop work order will occur when the IEM is satisfied that the appropriate steps have been taken to ensure compliance.

To date, no stop work orders have been issued by the IEM.

8.3. Condition 8.3

The Proponent shall require the independent environmental monitor to prepare reports that include:

8.3.1 a description, including through photo evidence, of the Designated Project activities that occurred and the mitigation measures that were applied during the period covered by the report; and

8.3.2 if any, a description, including through photo evidence, of occurrences of non-compliance related to the implementation of mitigation measures set out in this Decision Statement Page 12 of 14 observed during the period covered by the report, the date of the occurrence(s) of non-compliance, whether Designated Project activities were stopped as a result of non-compliance, how the occurrence(s) of non-compliance was or were corrected by the Proponent, the date that the corrective action(s) was or were completed by the Proponent, or, if any, the status of pending occurrence(s) non-compliance that have not been corrected yet, and a description of any adverse environmental effect(s) associated with the occurrence(s) of non-compliance.

The first IEM inspection occurred July 11-12, 2018.

In 2024, IEM site visits were reduced due to the mine site being in care and maintenance and having reduced flights. Inspections were done by questionnaire. In total, the IEM prepared reports in January, April and August 2024 which were forwarded to IAAC, TKN, and provincial regulators. EDI was scheduled for a site visit in September but due to inclement weather travel to site was cancelled.

As per the July 2022 Environmental Monitoring Committee Terms of Reference document, an

annual meeting occurred between AuRico, the IEM, EAO, IAAC, and other Regulators and Aboriginal Groups on June 7 2024.

At each meeting, the Holder will provide a summary of Project activities since the last meeting and forecasted construction activities. The IEM will provide an update on the following items.

- Review of previous environmental concerns and status; and
- Summary of new environmental non-compliances and incidences, all corrective actions undertaken and successes of those actions.

The IEM will document, through written and photo documentation, any relevant inspections and communications pertaining to any non-compliance within the IEM checklist and the issue tracking log. Non-compliances will be closed out pending corrective action and removed from the issue tracking log in the subsequent report following indication of closure. Corrective actions by the Holder will be documented in the monthly report along with the date of corrective actions, the status of pending occurrences that have not been corrected yet, and a description of any adverse environmental effects associated with the occurrences of non-compliance.

8.4. Condition 8.4

The Proponent shall require the independent environmental monitor to retain the reports referred to in condition 8.3 until the end of decommissioning. The Proponent shall require the independent environmental monitor to provide the reports referred to in condition 8.3 to the Agency, Indigenous groups, and relevant federal authorities within 10 days of their production. If occurrence(s) of non-compliance are observed by the independent environmental monitor, the Proponent shall require the independent environmental monitor to report all occurrence(s) of non-compliance directly to the Agency, Indigenous groups, and relevant federal authorities within 24 hours.

AuRico has communicated the requirement for the IEM to retain compliance reports until the end of decommissioning. The IEM and IEM Support will be tasked with documenting compliance with the Certificate conditions and management plan commitments throughout all Project phases. The IEM will provide information to EAO, IAAC, Ministry of Mining and Critical Minerals (MCM), Ministry of Environment (ENV), Ministry of Forests (MOF), Ministry of Land, Water and Resource Stewardship (WLRS) and to Aboriginal Groups as directed by EAO and set out in the Decision Statement. The IEM will not provide such information or reports to the Holder in advance of providing such information or reports to the EAO and IAAC. The IEM will submit monthly (or following their site visit) a report to the Holder, the EAO, and IAAC simultaneously via email. Information or reports related to non-compliance will not be submitted to the Holder in advance of providing the information to the EAO and IAAC.

To align with Condition No. 12 of the Provincial EA Certificate related to the EMC, and item 8.4 of the Decision Statement to provide reports to Indigenous groups, the IEM will submit the monthly (subject to site visit) and end of phase reports to the EMC on behalf of the Holder.

9. Condition 9: Accidents and Malfunctions

9.1. Conditions 9.1, 9.2, 9.3, 9.4

9.1 The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.

9.2 The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.

9.3 The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an emergency response plan in relation to the Designated Project.

9.4 In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall implement the emergency response plan referred to in condition 9.3 and shall:

9.4.1 notify Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities of the accident or malfunction as soon as possible, and notify the Agency in writing;

9.4.2 implement immediate measures to mitigate any adverse environmental effects associated with the accident or malfunction;

9.4.3 submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction took place. The written report shall include:

9.4.3.1 a description of the accident or malfunction and of its adverse environmental effects;

9.4.3.2 the measures that were taken by the Proponent to mitigate the adverse environmental effects of the accident or malfunction;

9.4.3.3 any views received from Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities with respect to the accident or malfunction, its adverse environmental effects, and measures taken by the Proponent to mitigate adverse environmental effects; Page 13 of 14

9.4.3.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects;

9.4.3.5 details concerning the implementation of the emergency response plan referred to in condition 9.3; and

9.4.4 submit a written report to the Agency, no later than 90 days after the day on which the accident or malfunction took place, on the changes made to avoid a subsequent occurrence

of the accident or malfunction, and on the implementation of any modified or additional measures to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information in the written report submitted pursuant to condition 9.4.3.

AuRico Metals submitted its permit application to the Major Mines Permitting Office (MMPO) on August 31, 2017. Prior to the official permit application submission, AuRico Metals consulted with TKN on the development of the Emergency Response Plan, circulating a draft copy of the plan for comment and feedback on June 30, 2018, which was 60 days in advance of the official permit submission. The Mine Emergency Response Plan (MERP) was developed in consideration to conditions 9.3 and 9.5.

To date, no comments from TKN have been received on the MERP or the Accidents and Malfunctions Communication Plan.

AuRico and TKN continue to consult on management plans through the permitting process and through established collaboration and consultation methods espoused within the 2017 Impact Benefit Agreement. Permitting and permitting consultation activities with relevant authorities and TKN for KUG is ongoing. The Mine Review Committee is paused until construction is initiated at the mine site for development of KUG.

Reporting of accidents and malfunctions has followed the process outlined in this condition when required, by notifying the parties specified in 9.4.1.

9.2. Condition 9.5

The Proponent shall develop and implement a communication plan in consultation with Indigenous groups and Gitxsan Wilp Nii Kyap. The Proponent shall develop the communication plan prior to construction and shall implement and maintain it up to date from the start of construction to the end of decommissioning. The plan shall include:

9.5.1 the types of accidents and malfunctions requiring the Proponent to notify the respective Indigenous groups and Gitxsan Wilp Nii Kyap;

9.5.2 the manner by which Indigenous groups and Gitxsan Wilp Nii Kyap shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups and Gitxsan Wilp Nii Kyap to assist in the response to the accident or malfunction; and

9.5.3 the contact information of the representatives of the Proponent that the Indigenous groups and Gitxsan Wilp Nii Kyap may contact and of the representatives of the respective Indigenous groups and Gitxsan Wilp Nii Kyap to which the Proponent provides notification.

As per Condition 9.5, the Accidents and Malfunctions Communication Plan was developed in

2018 to guide the co-ordination of communications between the organization and any applicable outside agencies (e.g. regulatory agencies, stakeholders, and the public) in the event of an accident and/or malfunction resulting from the KUG Project.

This plan identifies the types of accidents and malfunctions requiring notification to external stakeholders and the timeframe of notification (including updates subsequent to the initial notification) to each Aboriginal Group, community, and other users of the area that could be affected by the accident and/or malfunction.

AuRico circulated the draft Accidents and Malfunctions Communication Plan to Gitxsan Wilp Nii Kyap on December 22, 2017 and continues to collaborate within the 2023 Kemess Relationship Agreement and associated Environmental Working Group.

10. Condition 10: Implementation Schedule

An update to the implementation schedule for the decision statement is provided in Appendix A.

11. Closure

Respectfully submitted,

Ryan Trudeau, B.Sc., R.P.Bio

Senior Environmental Coordinator
Kemess Mine
Ryan.Trudeau@Centerragold.com
604-424-8200 x13823

APPENDIX A

***Kemess Underground Project 2024
Decision Statement
Implementation Schedule***



AuRico Metals Inc., a wholly owned subsidiary of Centerra Gold Inc.
1 University Avenue, Ste. 1800,
Toronto, Ontario, M5J 2P1

Submitted electronically to: postdecision@iaac-aeic.gc.ca

Impact Assessment Agency of Canada
22nd Floor, Place Bell
160 Elgin Street, Ottawa
ON K1A 0H3, Canada

March 31, 2025

To Whom It May Concern,

Re: AuRico Metals Inc. Kemess Underground Project, Decision Statement Condition #10.3 Implementation Schedule

As per IAAC Condition 10.3 of the March 13, 2017 AuRico Metals Kemess Underground Project which states:

“The Proponent shall provide the Agency with a revised implementation schedule if any material change(s) occur from the initial schedule referred to in condition 10.1 or any subsequent update(s).”

Enclosed in the IAAC report contains an updated Implementation Schedule for the Kemess Underground Project. Currently, the project is in Care and Maintenance. The attached schedule outlines the proposed implementation plan for the project's future. Also please reference Chapter 3, Section 3.2 of the Mines Act Application for the construction schedule of the Project. Please note that this schedule is subject to change in future years. AuRico will provide updated schedules within subsequent annual reports, submitted by March 31 each year.

If you have any questions or concerns, please do not hesitate to contact me directly.

Sincerely,

Ryan Trudeau
Senior Environmental Coordinator, Kemess Underground Project
Ryan.Trudeau@centerragold.com

C.c. Takla Lake First Nation
Tsay Keh Dene First Nation
Kwadacha First Nation
Gitxsan Wilp Nii Kyap First Nation

AuRico Metal Inc Kemess Underground Implementation Schedule

CEAA Condition	Condition	Commencement Date	Completion date
2	General Conditions		
2.1	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including community and Indigenous traditional knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically achievable technologies.	March 13, 2017	End of all Project phases

2.2	The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement: 2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation; 2.2.2 provide sufficient information on the scope and the subject matter of the consultation and a reasonable period of time to permit the party or parties being consulted to prepare their views and information; 2.2.3 provide a full and impartial consideration of any views and information presented by the party or parties being consulted on the subject matter of the consultation; and 2.2.4 advise in a timely manner the party or parties being consulted on how their views and information have been considered by the Proponent.	March 13, 2017	End of all Project phases
2.3	The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with	March 13, 2017	End of all Project phases

	respect to the manner by which to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to be provided when seeking input, the process for full and impartial consideration of any views and information presented on the subject of the consultation, and the means by which Indigenous groups will be informed of how their views and information have been considered by the Proponent.		
2.4	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of the follow-up program and in consultation with Indigenous groups and relevant authorities, the following information, for each follow-up program: 2.4.1 the methodology, location, frequency, timing, and duration of monitoring associated with the follow-up program as well as the scope, content, and frequency of reporting of the follow-up results; 2.4.2 the levels of environmental change relative to established baseline	April 1, 2018	End of all Project phases

	conditions that would require the Proponent to implement additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and 2.4.3 the range of technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.4.2 have been reached or exceeded.		
2.5	The Proponent shall submit the information referred to in condition 2.4 to the Agency prior to the implementation of a follow-up program. The Proponent shall update that information in consultation with Indigenous groups and relevant authorities during the implementation of the follow-up program, and shall provide the updated information to the Agency, Indigenous groups, and relevant authorities within 30 days of the information being updated.	April 1, 2018	End of all Project Phases
2.6	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:	April 1, 2018	End of all Project Phases

	2.6.1 conduct the follow-up program according to the information determined pursuant to condition 2.4; 2.6.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s); 2.6.3 determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.6.2; and 2.6.4 if modified or additional mitigation measures are required pursuant to condition 2.6.3, 2.6.4 develop and implement the modified or additional mitigation measures in a timely manner and monitor them pursuant to condition 2.6.2.		
2.7	Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for the participation of that Indigenous group in the implementation of the follow-up program, including the analysis of the follow-up results and whether modified	March 13, 2017	End of all Project phases

	or additional mitigation measures are required, as set out in condition 2.6.		
2.8	The Proponent shall follow the consultation process outlined in conditions 2.3, 2.4, 2.5, and 2.7 when consulting Gitxsan Wilp Nii Kyap for the purpose of conditions 3.7 and 9.5.	January 27, 2023	End of all Project phases
2.9	The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out: 2.9.1 the activities undertaken in the reporting year to comply with each of the conditions set out in this Decision Statement; 2.9.2 how the Proponent complied with condition 2.1; 2.9.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;	March 13, 2017	End of all Project phases

	2.9.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program; 2.9.5 the results of the follow-up program requirements identified in conditions 3.7, 4.3, 5.1, 6.10, and 6.11; and 2.9.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.6.		
2.10	The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including an executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.	March 31, 2017	End of All Project Phases
2.11	The Proponent shall publish on the Internet, or any medium which is widely publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10, the reports related to accidents and malfunctions referred to in conditions 9.4.3 and 9.4.4, the communication plan referred to in condition 9.5, the implementation schedule referred to in condition 10.1, and any update(s) or revision(s) to the above documents,	April 1, 2017	End of All Project Phases

	upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available throughout construction and operation and until the end of decommissioning. The Proponent shall notify the Agency, Indigenous groups, and Gitxsan Wilp Nii Kyap of the availability of these documents upon publication.		
2.12	The Proponent shall notify the Agency and Indigenous groups in writing no later than 60 days after the day on which there is a transfer of ownership, care, control, or management of the Designated Project in whole or in part.	As required	End of all Project phases
2.13	The Proponent shall consult with Indigenous groups prior to initiating any material change(s) to the Designated Project that may result in adverse environmental effects and shall notify the Agency in writing no later than 60 days prior to initiating the change(s).	As required	End of all Project phases
2.14	In notifying the Agency pursuant to condition 2.13, the Proponent shall provide the Agency with a description of the potential adverse environmental effects of the change(s) to the Designated Project, the measures proposed to be implemented by the	As required	End of all Project phases

	Proponent to mitigate adverse environmental effects, and the results of the consultation with Indigenous groups.		
3			
3.1	The Proponent shall implement erosion and sedimentation control measures within the Project area during all phases of the Designated Project to avoid the deposit of deleterious substances in waters frequented by fish.	April 1, 2018	End of all Project Phases
3.2	The Proponent shall, taking into consideration Fisheries and Oceans Canada's <i>Measures to Avoid Causing Harm to Fish and Fish Habitat Including Aquatic Species at Risk</i> , implement mitigation measures when conducting Designated Project activities to avoid causing harm to fish and fish habitat, including timing work in or around water to respect the timing windows identified to protect fish.	April 1, 2018	End of all Project Phases
3.3	The Proponent shall comply with the <i>Metal Mining Effluent Regulations</i> and subsection 36(3) of the <i>Fisheries Act</i> regarding the deposit of effluent from the Designated Project in water frequented by fish, taking into account the Canadian Council of Ministers of the Environment's <i>Water Quality Guidelines for the Protection of Aquatic Life</i> , from	April 1, 2018	End of all Project Phases

	the start of construction to the end of decommissioning. In doing so, the Proponent shall: 3.3.1 place all acid-generating and potentially acid-generating material into the tailings storage facility and submerge all such materials placed in the tailings storage facility under a permanent water cover; and 3.3.2 collect and treat all waters affected by the Designated Project that do not meet the requirements of the <i>Metal Mining Effluent Regulations</i> and subsection 36(3) of the <i>Fisheries Act</i>, as applicable, prior to the affected waters being deposited in waters frequented by fish.		
3.4	The Proponent shall install hydraulic plugs in the declines before the underground mine is flooded to direct seepage from the flooded underground mine towards East Cirque Creek.	On or about 2037	On or about 2037
3.5	The Proponent shall, in a manner that complies with the <i>Metal Mining Effluent Regulations</i> and subsection 36(3) of the <i>Fisheries Act</i> , discharge water from the tailings storage facility into Attichika Creek during construction and the first year of operation such that flow rates downstream of the discharge location	September 2020, excluding 2021 as AuRico is not permitted to discharge within the year.	On or about 2030

	are within the range of minimum and maximum flow rates naturally occurring in Attichika Creek and shall only discharge water into Attichika Creek during open water months.		
3.6	The Proponent shall divert all runoff from the East Pit quarry into the tailings storage facility during construction and operation.	April 1, 2018	On or about 2035
3.7	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities, and implement, from the start of construction to the end of decommissioning, a follow-up program to verify the accuracy of the environmental assessment as it pertains to fish and fish habitat and to determine the effectiveness of mitigation measures referred to in conditions 3.1 to 3.6. As part of the follow-up program, the Proponent shall: 3.7.1 monitor quality of water discharged in Attichika Creek during the dewatering of the Kemess South Pit and treat that water to meet the requirements of subsection 36(3) of the <i>Fisheries Act</i>;	September 2020	End of all Project Phases

	3.7.2 monitor surface water quality in Amazay Lake and groundwater movement between the subsidence zone identified by the Proponent during the environmental assessment and Amazay Lake; 3.7.3 monitor changes in channel form and sediment load downstream of the discharge location in Attichika Creek; 3.7.4 monitor changes in water quality in Waste Rock Creek and the tailings storage facility, including changes in selenium concentrations; 3.7.5 monitor the presence and use of spawning habitat by bull trout (<i>Salvelinus confluentus</i>) and rainbow trout (<i>Oncorhynchus mykiss</i>) downstream of the discharge location in Attichika Creek prior to and after the installation of the discharge pipeline into Attichika Creek. The Proponent shall offset any loss of spawning habitat for bull trout (<i>Salvelinus confluentus</i>) and rainbow trout (<i>Oncorhynchus mykiss</i>) in Attichika Creek if monitoring results show that spawning habitat loss has occurred; and 3.7.6 monitor contaminants, including mercury, in the tissue of fish species harvested by Indigenous groups in		
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	Thutade Lake, including bull trout (<i>Salvelinus confluentus</i>).		
4			
4.1	The Proponent shall carry out Designated Project activities in a manner that protects migratory birds and avoids harming, killing, or disturbing migratory birds or destroying, disturbing, or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's <i>Avoidance Guidelines</i> . The Proponent's actions in applying the <i>Avoidance Guidelines</i> shall be in compliance with the <i>Migratory Birds Convention Act, 1994</i> and with the <i>Species at Risk Act</i> .	April 1, 2018	End of all Project Phases
4.2	The Proponent shall deter migratory birds from accessing the tailings storage facility (tsf) and seepage ponds until water quality is not harmful to migratory birds.	April 1 2018	End of 2030
4.3	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures to avoid harm to	April 1 2018	End of all Project Phases

	migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 and 4.2. The Proponent shall implement the follow-up program from the start of construction to the end of decommissioning.		
5			
5.1	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse effects on the health of Indigenous Peoples caused by changes in concentrations of contaminants of potential concern identified during the environmental assessment in air, soil, water, and sediment. The Proponent shall implement the follow-up program during construction and operation. As part of the development of the follow-up program, the Proponent shall: 5.1.1 identify levels of environmental change relative to established baseline conditions for contaminants of potential concern that would require the Proponent to implement modified or additional mitigation measure(s) to mitigate increased risks to human health; and	April 1, 2018	End of all Project phases

	5.1.2 if monitoring results demonstrate that concentration levels for contaminants of potential concern are greater than the identified levels of environmental change, update the human health risk assessment for the consumption of traditional foods exposed to these contaminants and communicate the results of the updated human health risk assessment to Indigenous groups.		
6	Current use of lands and resources for traditional purposes		
6.1	The Proponent shall install and maintain, during construction and operation, ramps every 100 to 300 metres over the discharge line between the tailing storage facility and Attichika Creek to provide passage for moose (<i>Alces alces</i>), woodland caribou (<i>Rangifer tarandus caribou</i>), grizzly bear (<i>Ursus arctos</i>), and furbearers. The Proponent shall identify the locations of ramps in consultation with Indigenous groups and relevant authorities.	April 1, 2018	On or about 2035
6.2	The Proponent shall create and maintain, during construction and operation, escape pathways along all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road, to allow ungulates to exit the plowed roads. The	April 1, 2018	On or about 2035

	Proponent shall identify the locations of escape pathways in consultation with Indigenous groups and relevant authorities.		
6.3	The Proponent shall, from the start of construction to the end of decommissioning, remove carrion within 24 hours of its discovery by the Proponent from all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road.	April 1, 2018	End of all Project Phases
6.4	The Proponent shall prohibit employees and contractors associated with the Designated Project from fishing, hunting, and trapping within the Project Area, unless an employee or a contractor is provided access by the Proponent for traditional purposes or for exercising Aboriginal rights, to the extent that such access is safe.	April 1, 2018	End of all Project Phases
6.5	The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, conduct pre-clearing surveys to identify Western toad (<i>Anaxyrus boreas</i>) breeding habitat, and shall implement measures to mitigate the loss of Western toad (<i>Anaxyrus</i>	March 15, 2018	April 1, 2018

	<i>boreas</i>) breeding habitat caused by the Designated Project.		
6.6	The Proponent shall conduct pre-clearing surveys to determine the distribution of little brown myotis (<i>Myotis lucifugus</i>) and Northern myotis (<i>Myotis septentrionalis</i>), and establish, in consultation with Indigenous groups and relevant authorities, buffer zones around active hibernacula and active roosts.	March 15, 2018	April 1, 2018
6.7	The Proponent shall install, prior to construction, and maintain, during construction and operation, roosting structures to offset any loss of little brown myotis (<i>Myotis lucifugus</i>) and Northern myotis (<i>Myotis septentrionalis</i>) roosting habitat.	April 1, 2018	2035
6.8	The Proponent shall develop and implement a follow-up program to monitor the little brown myotis (<i>Myotis lucifugus</i>) and Northern myotis (<i>Myotis septentrionalis</i>) usage of buffer zones and roosting structures to determine the effectiveness of the mitigation measures during construction and operation.	April 1, 2018	2035
6.9	The Proponent shall, in consultation with Indigenous groups, undertake	April 1 2017	End of all Project phases

	progressive reclamation of the habitats disturbed by the Designated Project. The Proponent shall use native species when undertaking that progressive reclamation.		
6.10	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of hoary marmot (<i>Marmota caligata</i>), white-tailed ptarmigan (<i>Lagopus leucura</i>), and short-eared owl (<i>Asio flammeus</i>) within the subsidence zone identified by the Proponent during the environmental assessment and within a buffer area of 250 metres along the limits of that subsidence zone. The Proponent shall implement the follow-up program during construction and operation.	April 1, 2018	End of all Project phases
6.11	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the effects of changes caused by the Designated Project to the Chase herd of Southern mountain caribou (<i>Rangifer tarandus caribou</i>) and the Thudade herd	April 1, 2018	End of all Project phases

7.1	The Proponent shall, for any previously unidentified archeological structures, sites, or things of historical, archaeological, paleontological, or architectural significance discovered by the Proponent or brought to the attention of the Proponent by an Indigenous group, Gitxsan Wilp Nii Kyap, or another party during any phase of the Designated Project: 7.1.1 immediately halt work at the location of the discovery; 7.1.2 have a qualified individual conduct an assessment at the location of the discovery; 7.1.3 inform, forthwith, in writing, Indigenous groups and Gitxsan Wilp Nii Kyap of the discovery, and allow for monitoring by Indigenous groups and Gitxsan Wilp Nii Kyap during archeological work; and 7.1.4 comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring, and safekeeping of previously unidentified archeological structures, sites, or things of historical, archaeological, paleontological, or architectural significance.	April 1, 2018	End of all Project Phases
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7.2	The Proponent shall not undertake any ground altering activities within 50 metres of the boundaries of archeological sites, unless authorized by relevant authorities.	April 1, 2018	End of all Project Phases
8	Independent Environmental Monitor		
8.1	Prior to the start of construction, the Proponent shall retain the service of an independent environmental monitor, who is a qualified individual as it pertains to environmental monitoring of mining projects in British Columbia, to observe, record, and report on the implementation of the mitigation measures set out in this Decision Statement.	April 1, 2018	End of all Project Phases
8.2	The Proponent shall give the independent environmental monitor the authority to stop Designated Project activities that do not comply with the conditions set out in this Decision Statement.	April 1, 2018	End of all Project Phases
8.3	The Proponent shall require the independent environmental monitor to prepare reports that include: 8.3.1 a description, including through photo evidence, of the Designated Project activities that occurred and the mitigation measures that were applied during the period covered by the report; and	April 1, 2018	End of all Project Phases

	8.3.2 a description, including through photo evidence, of occurrences of non-compliance related to the implementation of mitigation measures set out in this Decision Statement observed during the period covered by the report, the date of the occurrence(s) of non-compliance, whether Designated Project activities were stopped as a result of non-compliance, how the occurrence(s) of non-compliance was or were corrected by the Proponent, the date that the corrective action(s) was or were completed by the Proponent, or, if any, the status of pending occurrence(s) non-compliance that have not been corrected yet, and a description of any adverse environmental effect(s) associated with the occurrence(s) of non-compliance.		
8.4	The Proponent shall require the independent environmental monitor to retain the reports referred to in condition 8.3 until the end of decommissioning. The Proponent shall require the independent environmental monitor to provide the reports referred to in condition 8.3 to the Agency, Indigenous groups, and relevant federal authorities within 10 days of their production. If occurrence(s) of non-	April 1, 2018	End of all Project Phases

	compliance are observed by the independent environmental monitor, the Proponent shall require the independent environmental monitor to report all occurrence(s) of non-compliance directly to the Agency, Indigenous groups, and relevant federal authorities immediately.		
9			
9.1	The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.	April 1, 2017	End of all Project Phases
9.2	The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.	March 13, 2017	End of all Project phases
9.3	The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an emergency response plan in relation to the Designated Project.	March 13, 2017	On or about April 1, 2018
9.4	In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall implement the emergency response plan referred to in condition 9.3 and shall:	April 1, 2018	End of All Project phases

	9.4.1 notify Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities of the accident or malfunction as soon as possible, and notify the Agency in writing; 9.4.2 implement immediate measures to mitigate any adverse environmental effects associated with the accident or malfunction; 9.4.3 submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction took place. The written report shall include: 9.4.3.1 a description of the accident or malfunction and of its adverse environmental effects; 9.4.3.2 the measures that were taken by the Proponent to mitigate the adverse environmental effects of the accident or malfunction; 9.4.3.3 any views received from Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities with respect to the accident or malfunction, its adverse environmental effects, and measures taken by the Proponent to mitigate adverse environmental effects;		
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	9.4.3.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; 9.4.3.5 details concerning the implementation of the emergency response plan referred to in condition 9.3; and 9.4.4 submit a written report to the Agency, no later than 90 days after the day on which the accident or malfunction took place, on the changes made to avoid a subsequent occurrence of the accident or malfunction, and on the implementation of any modified or additional measures to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information in the written report submitted pursuant to condition 9.4.3.		
9.5	The Proponent shall develop and implement a communication plan in consultation with Indigenous groups and Gitxsan Wilp Nii Kyap. The Proponent shall develop the communication plan prior to construction and shall implement and maintain it up to date from the start of construction to the end of	March 13, 2017	April 1, 2018

	decommissioning. The plan shall include: 9.5.1 the types of accidents and malfunctions requiring the Proponent to notify the respective Indigenous groups and Gitxsan Wilp Nii Kyap; 9.5.2 the manner by which Indigenous groups and Gitxsan Wilp Nii Kyap shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups and Gitxsan Wilp Nii Kyap to assist in the response to the accident or malfunction; and 9.5.3 the contact information of the representatives of the Proponent that the Indigenous groups and Gitxsan Wilp Nii Kyap may contact and of the representatives of the respective Indigenous groups and Gitxsan Wilp Nii Kyap to which the Proponent provides notification.		
10	Implementation schedule		
10.1	The Proponent shall submit an implementation schedule for conditions contained in this Decision Statement to the Agency at least 30 days prior to the start of construction. The implementation schedule shall indicate the commencement and completion dates for each activity	March 3, 2018	March 31, 2018

	relating to conditions set out in this Decision Statement.		
10.2	The Proponent shall submit an update to this implementation schedule in writing to the Agency every two years on or before March 31, until completion of the activities.	2024	End of all phases of Project
10.3	The Proponent shall provide the Agency with a revised implementation schedule if any material change(s) occur from the initial schedule referred to in condition 10.1 or any subsequent update(s). The Proponent shall provide the revised implementation schedule at least 30 days prior to the implementation of the change.	As required	End of all phases of Project
11			
11.1	The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement, including any records that the Agency considers relevant. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.	March 13, 2017	End of all phases of Project
11.2	The Proponent shall retain all records referred to in condition 11.1 at a facility	March 13, 2017	End of all phases of Project

	in Canada. The records shall be retained and made available throughout construction and operation and until the end of decommissioning. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained and shall provide the address of the new location.		
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APPENDIX B

Wildlife Sightings at Kemess Mine and on the Omineca Resource Access Road (ORAR)

