

To Sarah Devin
 Senior Analyst
 Impact Assessment Agency of Canada

From Karen Leven, Vice President, Environment and Regulatory Affairs, Skeena Gold + Silver

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Date 22 May 2026

Subject **Eskay Creek Revitalization Project – Notification of a Proposed Change to the Designated Project**

Dear Ms. Devin,

Eskay Creek Mining Limited (ECML), a wholly owned subsidiary of Skeena Resources Limited, received a Decision Statement under Section 65 of the *Impact Assessment Act* on January 26, 2026 for the Eskay Creek Revitalization Project (“Decision Statement”). As required by Section 2.15 of the Decision Statement, ECML is writing to provide notice of a proposed change to the Designated Project, specifically the relocation of the Permanent Camp from within the Tom MacKay Storage Facility (TMSF) Area defined in Schedule 1 of the Decision Statement, to the location of an existing camp at kilometre (KM) 46 of the existing Eskay Creek Mine Access Road that is currently housing workers supporting the Eskay Creek Technical Sample Project. This proposed change also requires an amendment to the Eskay Creek Revitalization Project’s Environmental Assessment Certificate #M26-01. ECML has prepared the attached *KM46 Camp Amendment Application* (“Amendment Application”) in fulfillment of both Impact Assessment Agency of Canada and British Columbia (BC) Environmental Assessment Office (EAO) requirements.

The Amendment Application provides the information required by Section 2.15 of the Decision Statement. The Amendment Application provides a detailed description of the proposed changes. With respect to the proposed changes to the Designated Project, as described in Schedule 1 of the Decision Statement, ECML is seeking deletion of the following clause under the heading “Tom MacKay Storage Facility Area”:

existing permanent camp with possible expansion up to 380 bed units and mine dry, camp access road, and associated ancillary infrastructure;

and inclusion of:

The Mine Camp Area shown on Figure [number to be determined] includes a Permanent Camp with possible expansion up to 500 bed units and mine dry, and associated ancillary infrastructure.

No other changes are requested to the Decision Statement.

The potential adverse federal effects that may result from the proposed changes are presented in Section 5.3 of the Amendment Application. As discussed in the Amendment Application, after taking into account

existing mitigation measures, there would be no change in the adverse federal effects of the Designated Project.

The Amendment Applications discussed the potential effects to Indigenous groups in Sections 7.0 to 10.0. As per Section 2.15.4 of the Decision Statement, based on the conclusions of the Eskay Creek Revitalization Project's Environmental Assessment and the proposed changes, ECML only identified that the proposed changes have the potential to affect Tahltan Nation. As discussed in the Amendment Application, ECML has engaged Tahltan Nation on the development of the Amendment Application, including discussion of the proposed change when it was originally identified in early 2025 and review of the draft Amendment Application. Tahltan Nation is currently actively working with the BC EAO on their regulatory review of the Amendment Application. Based on ECML's assessment and feedback received, no notable interactions are expected between Tahltan Nation's interest and the proposed changes.

As you are aware, ECML is advancing construction activities on the Eskay Creek Revitalization Project in 2026 and timely use of the KM46 camp is critical to these works. The EAO, in collaboration with Tahltan Central Government, has been formally reviewing since February 11, 2026 and presently anticipates a decision by mid-June.

ECML is available to provide timely responses to any questions or requests for additional information from IAAC.

Sincerely,

<original signed by>

Karen Leven
Vice President, Environment and Regulatory Affairs
Skeena Gold + Silver
E-mail: kleven@skeenagold.com

Attachment: *KM46 Camp EAC Amendment Application (May 2026)*.



Eskay Creek Revitalization Project

KM46 Camp EAC Amendment Application

May 2026

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ACRONYMS AND ABBREVIATIONS

AIA	Archaeological Impact Assessment
BC	British Columbia
CEO	Chief Executive Officer
CPD	Certified Project Description
DS	Decision Statement
EA	Environmental Assessment
EAA	<i>Environmental Assessment Act</i> , SBC 2018, c.51
EAC	Environmental Assessment Certificate
EAC Application	Application for an Environmental Assessment Certificate / Impact Statement
EAO	British Columbia's Environmental Assessment Office
Eskay Creek MAR	Eskay Creek Mine Access Road
FIA	Fossil Impact Assessment
GHG	Greenhouse Gas
IAA	<i>Impact Assessment Act</i> , SC 2019, c 28, s 1
IAAC	Impact Assessment Agency of Canada
IPMA	Invasive Plant Management Area
MNBC	Métis Nation British Columbia
NLG	Nisga'a Lisims Government
Project	Eskay Creek Revitalization Project
Skeena Resources	Skeena Resources Limited
Tahltan Requirements	Tahltan Risk Assessment Factors and Tahltan Sustainability Requirements (as laid out in the Consent Agreement)
TCG	Tahltan Central Government
TEEM	Tahltan ERM Environmental Management
TMSF	Tom MacKay Storage Facility
TSKLH	Tsetsaut Skii km Lax Ha
VC	Valued Component
WLRS	Ministry of Water, Land and Resource Stewardship

SYMBOLS AND UNITS OF MEASUREMENT

ha	hectare
km	kilometre
KM	MAR kilometre marker
km/h	kilometre per hour
kV	kilovolt
kW	kilowatt
m	metre
Moz	million ounce
Mt	million tonne
Mt/year	million tonne per year
t	tonne

1.0 INTRODUCTION

1.1 Project Overview

Skeena Resources Limited¹ (Skeena Gold + Silver; Skeena Resources) is the owner and operator of the Eskay Creek Revitalization Project (Project), an open pit gold and silver mine located at the past producing Eskay Creek Mine site located within Tahltan Territory and Tsetaut Skii km Lax Ha Territory² in northwest British Columbia (BC). Figure 1.1-1 shows the location of the Project.

The Project is anticipated to have an 18-year mine life from Construction through Reclamation and Closure, followed by a period of Post-closure. The estimated total annual production in the Process Plant during Operations will be up to 3.0 million tonnes (Mt) in Years 1 to 5 and up to 3.6 Mt (i.e., approximately 10,000 tonnes per day) in Years 6 to 13. These production rates will produce an average of 0.20 million ounces (Moz) to 0.25 Moz of gold annually and 5.5 Moz to 7.0 Moz of silver annually.

The Project was issued an Environmental Assessment Certificate (EAC) under the *Environmental Assessment Act* (EAA; SBC 2018, c 51) on January 26, 2026 (EAC #M26-01). Tahltan Central Government (TCG) provided the TCG Notice of Decision on January 11, 2026, which provided TCG's free, prior and informed consent to the Project proceeding. The Project was also issued a Decision Statement (DS) under the federal *Impact Assessment Act* (IAA; SC 2019, c 28, s 1) on January 26, 2026.

This Amendment Application has been developed to allow for the relocation of the Permanent Camp located within the Tom MacKay Storage Facility (TMSF) Area in the EAC #M26-01 Certified Project Description (CPD) and Schedule 1 of the DS, to the location of the existing camp at KM46 along the existing Eskay Creek Mine Access Road (MAR) that is supporting the Eskay Creek Technical Sample Project (KM46 Advanced Exploration Camp). This Amendment Application seeks to establish a Mine Camp Area. This area would include the proposed Permanent KM46 Camp, which would increase the capacity of the existing approved KM46 Advanced Exploration Camp by up to 500 beds. The proposed Mine Camp Area allows for a buffer around the existing approved KM46 Advanced Exploration Camp, and the incinerator and a waste sorting and maintenance area on the northern side of the Eskay Creek MAR.

This Amendment Application assesses the potential effects of the proposed Camp relocation on the Valued Components (VCs) assessed in the original Application for an Environmental Assessment Certificate / Impact Statement (EAC Application; Skeena Resources 2025a) and whether the proposed Project changes would alter the characterization of residual effects in a way that would change the conclusions in the EAC Application.

Effects within federal jurisdiction set out in Section 2 of the IAA, as well as factors set out in subsection 22(1), including fish and fish habitat, migratory birds, heritage resources, Indigenous Peoples' physical and cultural heritage, traditional practices, and other matters, are also assessed in relation to the proposed Project changes in this Amendment Application.

¹ Eskay Creek Mining Limited (Ltd.) is a wholly owned subsidiary of Skeena Resources Limited, and will be the holder of all permits and authorizations. References to Skeena Resources Ltd. as the project proponent in this Amendment Application should be understood to be the same as Eskay Creek Mining Ltd.

² For the purposes of this document, "territory" is defined as the established or asserted traditional territories of Indigenous Nations.

1.2 Proponent Information

The Proponent contact information is provided below.

Head Office:	Skeena Resources Limited Suite #2600, 1133 Melville Street Vancouver, BC V6E 4E5 Phone: (604) 684-8725 Fax: (604) 558-7695 Website: https://skeenagoldsilver.com/
Executive Chairman:	Walter Coles Executive Chairman Skeena Resources Limited E-mail: wcoles@skeenagold.com Phone: (604) 684-8725
President and CEO:	Randy Reichert President, CEO, and Director Skeena Resources Limited E-mail: rreichert@skeenagold.com Phone: (604) 684-8725
Principal Contact for the Impact Assessment:	Nalaine Morin Senior Vice President, Environmental and Social Affairs Skeena Resources Limited E-mail: nmorin@skeenagold.com Phone: (604) 684-8725
Alternate Contact for the Impact Assessment:	Karen Leven Vice President, Environment and Regulatory Affairs Skeena Resources Limited E-mail: kleven@skeenagold.com Phone: (604) 684-8725

The contact information for the company responsible for the preparation of the Amendment Application, working in conjunction with Skeena Resources, is provided below:

Environmental Assessment Consultant to Skeena Resources:	Nathan Braun Partner Tahltan ERM Environmental Management (TEEM) E-mail: nathan.braun@erm.com Phone: (250) 516-3388
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2.0 DESCRIPTION OF PROPOSED AMENDMENT

This Amendment Application has been prepared to support Skeena Resources' request to relocate the Project's Permanent Camp. The Permanent Camp is currently approved to be within the TMSF Area, as defined in the EAC #M26-01 CPD and the DS Schedule 1. Skeena is seeking approval to move the Permanent Camp from the TMSF Area to the KM46 Advanced Exploration Camp, which is currently permitted and supports the Project's advanced exploration activities.

This section first introduces the existing KM46 Advanced Exploration Camp infrastructure and its current use. It then describes the proposed Permanent KM46 Camp, including its intended role as the Project's long-term Camp, and outlines the anticipated regulatory permits and authorizations required for its approval. Finally, this section identifies the specific amendments requested to the CPD and DS to enable the relocation.

2.1 KM46 Advanced Exploration Camp

In constructing and operating the Project, Skeena Resources will be using existing infrastructure that was constructed as part of the historical Eskay Creek Mine, as well as infrastructure constructed as part of the Eskay Creek Technical Sample Project (Skeena Resources 2024). A detailed list is available in Chapter 1, Project Overview, of the EAC Application (Section 1.4.1, Existing Infrastructure and Support Infrastructure) and includes water management infrastructure (contact/non-contact water, potable/non-potable water, sewage treatment, roads (including the Eskay Creek MAR), power supply, explosive storage facilities, waste management and ancillary infrastructure (including camps).

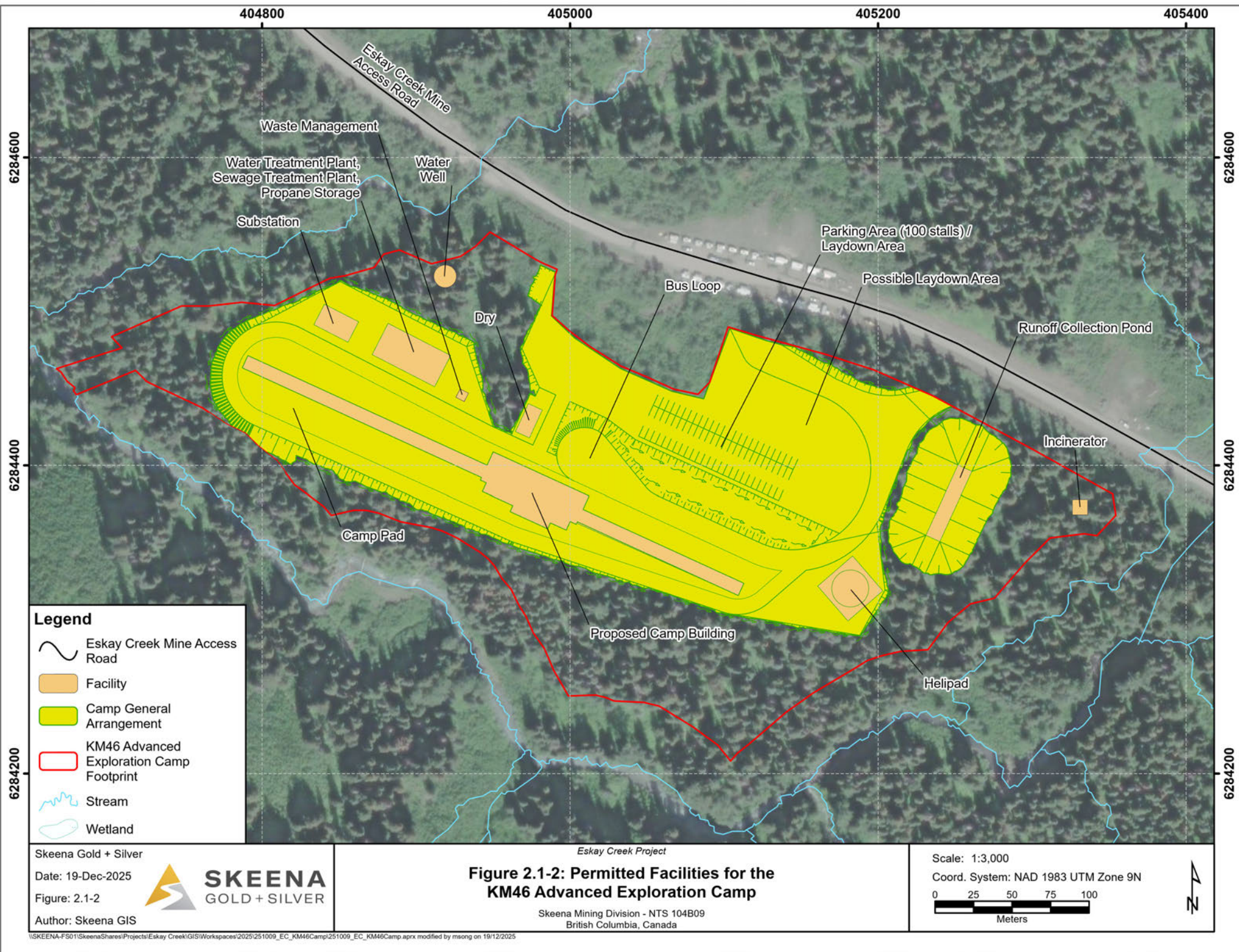
As part of the exploration phase of the Project, an Advanced Exploration Camp has been permitted and established at KM46 along the southern side of the Eskay Creek MAR (KM46 Advanced Exploration Camp; Figure 2.1-1). The KM46 Advanced Exploration Camp is accessed via the Eskay Creek MAR and includes a helipad and a security gate. Power to the KM46 Advanced Exploration Camp is provided by a modular substation. The permitted KM46 Advanced Exploration Camp area is 10.3 hectares (ha) and includes the following infrastructure and facilities:

- Dormitories (up to 381 beds),
- Kitchen/dining area,
- Boot room,
- Recreational/fitness facilities,
- Medical facilities,
- Parking area,
- Dry building,
- Propane storage,
- Water treatment plant,
- KM46 groundwater well (potable water source),
- Sewage treatment plant,

- Fire water system,
- Temporary waste storage, and,
- Incinerator.

Figure 2.1-2 presents the permitted facilities for the KM46 Advanced Exploration Camp.

All relevant permits associated with the construction of the KM46 Advanced Exploration Camp were obtained in 2025, including a Licence of Occupation was granted in June 2025 for the KM46 Advanced Exploration Camp (Licence #SK950901) for a term of 10 years, with opportunity for renewal. Operational permits related to the KM46 Advanced Exploration Camp have been developed and have either been submitted to the relevant authorities or are currently in review with the TCG before their submission in the first quarter of 2026. Operational permits and authorizations include effluent discharge, solid waste discharge and air emissions permits under the *Environmental Management Act* (EMA; SBC 2003, c 53).



2.2 Proposed Permanent KM46 Camp

The EAC Application (Skeena Resources 2025a) proposed a Permanent Camp near the TMSF to accommodate the personnel during the life of the Project. The Permanent Camp near the TMSF was planned to accommodate up to 380 beds, and included dormitories, kitchen and dining areas, boot room, recreational and fitness facilities, and medical facilities. The Permanent Camp near the TMSF was to be connected to the Project mine site grid power using a 13.8 kV powerline extending from Eskay Creek Substation in the Process Plant area. The Permanent Camp near the TMSF was to include the following ancillary infrastructure: Propane Storage, Potable Water Treatment Plant, Sewage Treatment Plant, Fire Water System and Waste Transfer Area.

Skeena Resources is looking to relocate the Permanent Camp for the Project to the location of the KM46 Advanced Exploration Camp (as described in Section 2.1). For the final configuration of the proposed Permanent KM46 Camp, the capacity of the KM46 Advanced Exploration Camp will be increased to up to 500 beds, and the existing footprint will be increased by 1.3 ha to accommodate a waste sorting and maintenance area on the northern side of the Eskay Creek MAR (total Camp Area of 11.6 ha). Based on the current design, only an additional 0.46 ha would require clearing, as 0.84 ha of the additional 1.3 ha is within the existing approved Transmission Line Crown Tenure.

To allow for design flexibility, Skeena Resources is seeking an EAC Amendment to include the proposed Mine Camp Area presented on Figure 2.2-1. This area includes a 25 m buffer around the existing permitted KM46 Advanced Exploration Camp and a 5 m buffer around the planned waste and maintenance area. The proposed Mine Camp Area would encompass a total of 16.5 ha. There is a 40m Riparian Management Area setback between the Camp Licence of Occupation (LoO) boundary and Volcano Creek and 30m Riparian Management Area setback between the Camp LoO boundary and the tributaries to the east and west. With the exception of the wastewater effluent infrastructure, there currently is no planned disturbance within the Riparian Management Areas. To be conservative, the buffer zone associated with the proposed Mine Camp Area is considered as additional land that could be cleared in this assessment, after deduction of the area overlapping with the Transmission Line Crown Tenure (0.39 ha), which is already permitted to be cleared.

The proposed Permanent KM46 Camp is currently planned to be used for the entire duration of the Project, including Construction (2 years), Operations (13 years) and Reclamation and Closure (3 years). The KM46 Advanced Exploration Camp has been granted Licence of Occupation #SK950901 for a term of 10 years, with opportunity for renewal.

While it is common for EAC Amendments to compare the change in infrastructure between what was originally approved in the EAC to the change being sought, the circumstance for this amendment is slightly different. Since the requested EAC Amendment would expand use of an existing approved temporary camp, the comparison focuses primarily on the changes required at KM46. The KM46 Advanced Exploration Camp infrastructure is in the process of been permitted to accommodate the increase in potable water, associated with the proposed Permanent KM46 Camp. As listed in Section 2.3, Permits, Licences and Approvals, several permits have already been approved, including air discharge permit PA-1120023 and a Section 9 water licence. Table 2.2-1 provides an overview of the changes identified between the KM46 Advanced Exploration Camp and the proposed Permanent KM46 Camp. For completeness, components associated with the KM46 Advanced Exploration Camp that are currently undergoing approval

review and will form part of the proposed Permanent KM46 Camp have been identified as changes in Table 2.2-1 and carried forward into Section 5.0, Identification of Potential Interactions with Proposed Project Changes. That is, only existing approved components of the KM46 Advanced Exploration Camp are considered to be already existing for the purpose of this Amendment Application.

Table 2.2-1: Changes Identified between the KM46 Advanced Exploration Camp and the Proposed Permanent KM46 Camp

Category	KM46 Advanced Exploration Camp	Proposed Permanent KM46 Camp	Changes Identified
Key Metrics	Two three-storey modular dormitory buildings (up to 381 beds)	Two three-storey modular dormitory buildings (up to 500 beds)	Increase in housing capacity (+ 119 beds) <i>Permit reviews for the increase in potable water are in progress (see Table 2.3-1)</i>
	Camp Tenure Area: 10.3 ha	Proposed Mine Camp Area: 16.5 ha (including buffer for design flexibility)	Additional land clearing (+ 4.97 ha ³) <i>Licence of Occupation Amendment in progress (see Table 2.3-1)</i>
Access	Eskay Creek MAR	Eskay Creek MAR	No change
	Security Gate at KM46	Security Gate at KM46	No change
Power Supply	Modular substation	Modular substation	No change
Camp Infrastructure	Dormitories	Dormitories	No change
	Kitchen & Dining areas	Kitchen & Dining areas	No change
	Boot room	Boot room	No change
	Recreational and fitness facilities	Recreational and fitness facilities	No change
	Medical facilities	Medical facilities	No change
	Parking area	Parking area	No change
	N/A	Waste sorting and maintenance area	Within the 1.3 ha area (with additional 0.46 ha clearing) on the northern side of the Eskay Creek MAR) <i>Licence of Occupation Amendment in progress (see Table 2.3-1)</i>
Ancillary Infrastructure	Dry building	Dry building	No change
	Propane storage	Propane storage	No change
	Potable water treatment plant	Potable water treatment plant	No change
	Sewage treatment plant	Sewage treatment plant	No change
	Fire water system	Fire water system	No change
	Waste transfer area	Temporary waste storage	No change

³ The buffer zone associated with the proposed Mine Camp Area is conservatively assumed to be lost in this assessment, however, there is currently no planned disturbance within the Riparian Management Areas.

Category	KM46 Advanced Exploration Camp	Proposed Permanent KM46 Camp	Changes Identified
	Incinerator on the southern side of the Eskay Creek MAR	Incinerator on the northern side of the Eskay Creek MAR	Within the 1.3 ha area (with additional 0.46 ha clearing) on the northern side of the Eskay Creek MAR) <i>Licence of Occupation Amendment in progress (see Table 2.3-1)</i>
	Operation of the incinerator under EMA PA-112023 on the northern side of Eskay Creek MAR	Operation of the incinerator under EMA PA-112023 on the northern side of Eskay Creek MAR	No change
Water Supply	KM46 Groundwater well	KM46 Groundwater well	Capacity increased to accommodate additional staff <i>Source Water Approval review in progress (see Table 2.3-1)</i>
Duration	10 years, with the possibility of extension	18 years (life of mine)	+ 8 years

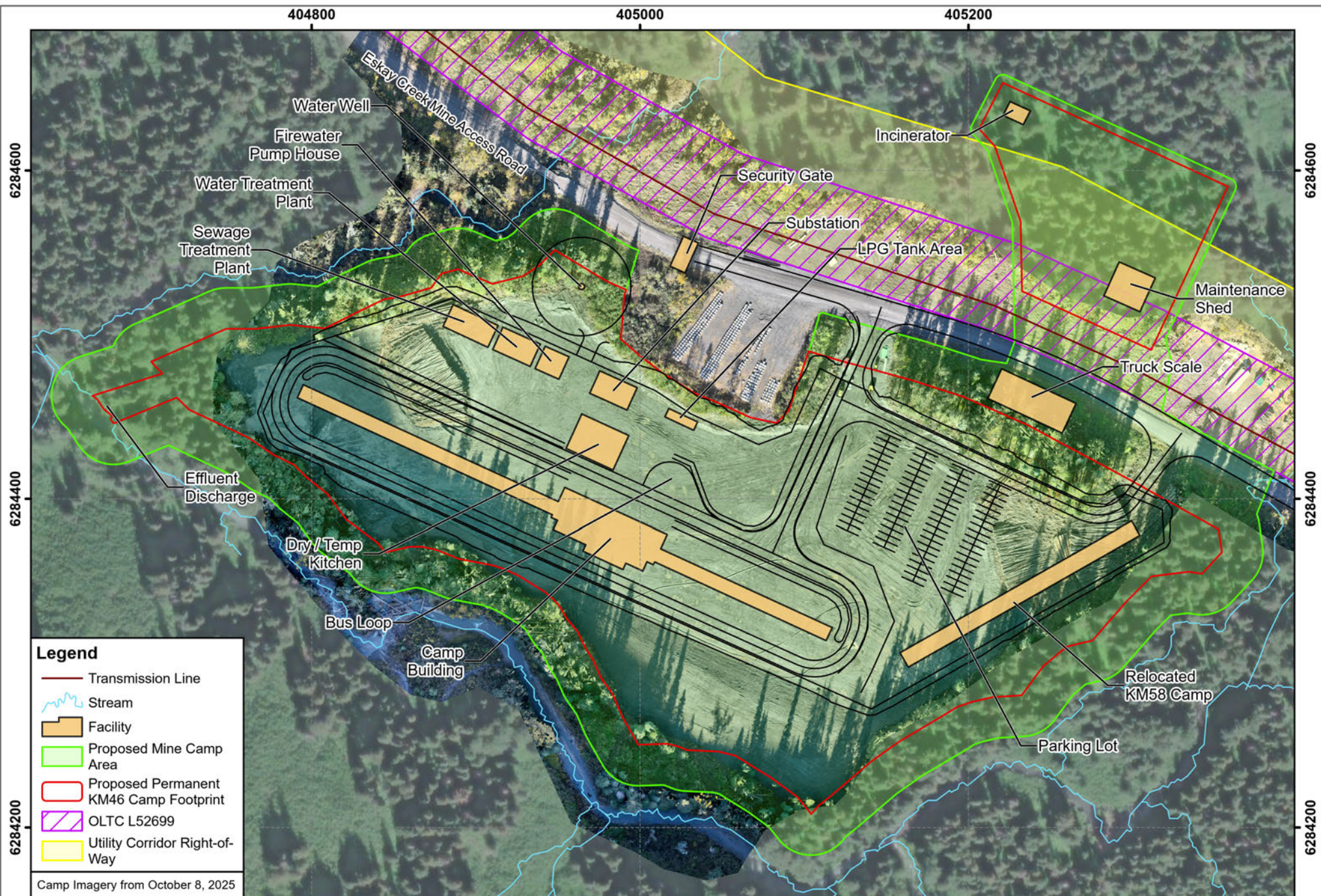
Figure 2.2-1 presents the planned layout for the proposed Permanent KM46 Camp.

The EAC Application originally noted some Project components that were associated with the Permanent Camp near the TMSF. For clarity, the Access Road and Eskay Creek Substation continue to be required, while the KM52.2 Gate will be no longer be required.

In summary, the following proposed Project changes are carried forward in Section 5.0, Identification of Potential Interactions with Proposed Project Changes:

1. Increase in housing capacity (+ 119 beds).
2. Land clearing (+ 4.97 ha).
3. Incinerator relocation.

The increase in the duration of the Permanent KM46 Camp is not carried forward in Section 5.0, Identification of Potential Interactions with Proposed Project Changes, as the change from a 10 year to an 18 year duration would not have the potential to result in a change in duration of effects to a VC.



Camp Imagery from October 8, 2025

Skeena Gold + Silver

Date: 23-Dec-2025

Figure: 2.2-1

Author: Skeena GIS



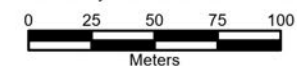
Eskay Creek Project

Figure 2.2-1: Proposed Mine Camp Area

Skeena Mining Division - NTS 104B09
British Columbia, Canada

Scale: 1:3,000

Coord. System: NAD 1983 UTM Zone 9N



2.3 Permits, Licences and Approvals

Table 2.3-1 summarizes the permits, licences and approvals required for the construction and operation of the KM46 Advanced Exploration Camp and their respective status. The KM46 Advanced Exploration Camp permits and approvals apply to the proposed Permanent KM46 Camp and amendments will be requested where applicable.

Table 2.3-1: Permits, Licences and Approvals for the KM46 Camp

Permit/Authorization Type	Authority	Status
License of Occupation	Ministry of Water, Land and Resource Stewardship (WLRS)	Approved in June 2025 Amendment in progress to authorize for the area north of the Eskay Creek MAR
Occupant Licence to Cut	Ministry of Forests	Approved in June 2025
Occupant Licence to Cut	Ministry of Forests	In progress to authorize for the amendment area north of the Eskay Creek MAR
WSA Section 9 New Water Licence	WLRS	Approved March 2026
Notification of Industrial Camp	Northern Health	In progress
Source Water Approval	Northern Health	In progress
Waterworks Construction Permit	Northern Health	In progress
Waterworks Operation Permit	Northern Health	In progress
Municipal Wastewater Regulation	Ministry of Environment and Parks	In progress
Air Discharge Permit PA-112023	Ministry of Environment and Parks	Approved February 2026

2.4 Requested Certified Project Description Amendment

Based on the proposed changes described in this Amendment Application, Skeena Resources is requesting the deletion of the following clause under section 2 (Project Components and Activities), subsection c) (TMSF Area) of the CPD of EAC #M26-01:

- xii. existing Permanent Camp with possible expansion up to 380 bed units and mine dry, camp access road, and associated ancillary infrastructure.

Additionally, Skeena Resources is requesting that the following bullet point be added to the CPD to define the Mine Camp Area, which is geographically separated from all the other areas currently defined in the CPD:

The Mine Camp Area shown on Figure [number to be determined by the EAO] includes a Permanent Camp with possible expansion up to 500 bed units and mine dry, and associated ancillary infrastructure.

Skeena Resources is requesting an equivalent amendment to the federal DS Schedule 1.

In addition, as the location of the Permanent Camp would change from the existing TMSF Area to the new Mine Camp Area, Skeena Resources is requesting that the following clauses under Condition 20.3 in the Table of Conditions of EAC #M26-01:

20.3 (a) how the mitigation measures described in Table 5-1 in Appendix A-01 of the Application listed as being included in the Human Health Monitoring Program will be implemented

20.3 (d) monitoring of particulate matter (PM2.5, PM10 and NO2) concentrations (outdoor and indoor) at all worker camps within the TMSF Area

be replaced with the following:

20.3 (a) how the mitigation measures described in Table 5-1 in Appendix A-01 of the Application listed as being included in the Human Health Monitoring Program, excluding Mitigation ID #20.15, will be implemented

20.3 (d) monitoring of PM2.5, PM10 and NO2 concentrations at the worker camp within the Mine Camp Area

Skeena Resources has not identified any other conditions in EAC #M26-01 that would require amendment or any amendment to conditions in the federal DS.

3.0 TAHLTAN ENGAGEMENT

Skeena Resources has been engaging with the TCG to discuss the proposed relocation of the permanent camp location and the changes discussed in this Amendment Application. The draft Amendment Application and a summary overview was shared with the TCG in February 2026 to seek feedback on the potential effects of the proposed changes.

Comments from TCG were received on April 20, 2026 and Skeena undertook a full and impartial consideration of the views and comments provided by TCG and their technical subject matter experts. Key issues raised included:

- Air quality and monitoring;
- Waste management;
- Footprint and camp design; and
- Assessment methodology and rationale.

Skeena provided TCG with a copy of the comment tracker which noted where revisions were made to the Application. Skeena also provided TCG with a red-line version of the changes.

4.0 ASSESSMENT METHODOLOGY

4.1 Identification of Potential Interactions with Proposed Project Changes

The first step of the assessment was to identify whether the proposed Project changes associated with the proposed Permanent KM46 Camp have the potential to interact with the VCs assessed in the EAC Application (Skeena Resources 2025a), as well as the additional Section 25(2) matters of the EAA. This initial step was done by ranking the anticipated interactions according to the following criteria:

- Empty circle (○): an interaction is not expected; no further assessment is warranted.
- Half-filled circle (◐): an interaction is possible but the potential for adverse effects resulting from the proposed Project changes are the same as (or less than) the effects assessed in the EAC Application and can be managed by the existing mitigation measures and management plans; a succinct rationale is provided but no further assessment is warranted.
- Filled circle (●): an interaction is likely and there is a potential for adverse effects compared to what was considered in the EAC Application, or because new interactions with a non-negligible potential for adverse effects were identified; further assessment is warranted.

Where interactions are expected and have a greater, or different and non-negligible potential for adverse effects, the corresponding VC or Section 25(2) matter was carried forward for further assessment (categorized as ●). Where interactions were not expected (categorized as ○) or when they would result in an equal or lesser potential for adverse effects (categorized as ◐), the corresponding VC or Section 25(2) matter was not carried forward for further assessment.

4.2 Effects Assessment

The VCs and additional Section 25(2) matters identified as requiring further assessment were evaluated by determining whether any residual effects arising from the proposed Project changes following the application of the identified mitigation could alter the characterization of overall Project residual effects described in the EAC Application (Skeena Resources 2025a). Where the proposed changes were found to have the potential to modify the conclusions of the EAC Application, the relevant residual effects were re-evaluated and consideration was given to whether modified or additional mitigation measures and follow-up measures were warranted.

The criteria used to characterize residual effects are consistent with those defined in Chapter 10, VCs Effects Assessment Methods, Section 10.6 Characterization of Residual Effects, of the EAC Application, and are summarized in Table 4.2-1. **Confidence, Probability, Consequence and Risk** are determined in accordance with the thresholds detailed in Section 10.6.1, Confidence and Risk, of the EAC Application.

Table 4.2-1: Characterization Criteria of Residual Effects

Criteria	Characterization
Magnitude	Low / Moderate / High
Geographic extent	<u>Environmental VCs</u> : Local / Landscape / Regional / Beyond regional <u>Social, economic, cultural, and health VCs</u> : Individual/household / Community / Regional/Indigenous Peoples / Beyond regional

Criteria	Characterization
Duration	Short-term / Medium-term / Long-term / Far-future
Frequency	Once / Sporadic / Regular / Continuous
Reversibility	Reversible short-term / Reversible long-term / Irreversible
Resilience	Low / Moderate / High
Ecological, social, and/or cultural context	Low / Neutral / High
Importance	Low / Moderate / High
Probability	Low / Medium / High

5.0 IDENTIFICATION OF POTENTIAL INTERACTIONS WITH PROPOSED PROJECT CHANGES

The objective of this section is to consider whether the potential effects of the proposed Project changes associated with the proposed Permanent KM46 Camp would alter the conclusions of the Project's EAC Application (Skeena Resources 2025a). If alterations to the conclusions are anticipated, following the application of previously approved (proposed to be modernized) mitigation measures, this assessment provides an opportunity to propose new mitigation.

Additionally, this section evaluates the proposed Project changes against the requirements of section 25(2) of the EAA and the effects within federal jurisdiction.

5.1 Potential Interactions with Valued Components

Table 5.1-1 identifies potential interactions between the proposed Project changes and VCs assessed in the EAC Application (Skeena Resources 2025a).

The rationale for each interaction rating is detailed in Table 5.1-1: either excluding (○ or ⊙) the VC from further consideration, or including (●) the VC for further consideration, if applicable.

Table 5.1-1: Potential Interactions between Valued Components and the Proposed Project Changes

Valued Component	Sub-Valued Components (if applicable)	Proposed Project Changes			Rationale
		Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Air Quality	-	○	●	●	Emissions associated with the installation of an incinerator at the KM46 Advanced Exploration Camp location were considered in the Eskay Creek Amendment Application to <i>Environmental Management Act</i> Permit PA-112023. The relocation of the incinerator to the opposite side of the Eskay Creek MAR is not expected to materially change the emissions levels or profile associated with the incinerator. The potential air quality effects on the Camp are expected to be reduced due to the increase in distance between the incinerator and the Camp. In addition, effects would be notably decrease from the location of the Permanent Camp that is currently approved in the EAC near the TMSF. The additional clearing activities are not expected to notably change the emissions levels. No change is expected, and the existing mitigations, commitments, and conditions are expected to remain sufficient. The Air Quality VC is excluded from further consideration.
Noise and Vibration	-	○	●	●	The proposed Project changes do not materially change the types of activities associated with the construction and operation of the Camp. Incinerators were not considered material noise emitters in the EAC Application (Skeena Resources 2025a) and were scoped out for potential interactions with the Noise and Vibration VC during the operational phase (Chapter 13, Noise and Vibrations Effects Assessment, Table 13.5-1, Potential Interactions between Project Activities and the Noise and Vibration Valued Component). Additionally, the potential noise effects on the Camp are expected to be reduced due to the increase in distance between the incinerator and the Camp. In addition, effects would be notably decrease from the location of the Permanent Camp that is currently approved in the EAC near the TMSF. Noise effects are anticipated to be comparable to what was previously assessed. No change is expected, and the existing mitigations, commitments and conditions are expected to remain sufficient. The Noise and Vibration VC is excluded from further consideration.

Valued Component	Sub-Valued Components (if applicable)	Proposed Project Changes			Rationale
		Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Groundwater Quantity and Quality	Groundwater Quantity	●	○	○	Potable water for the KM46 Advanced Exploration Camp will be provided by a groundwater well located within the Camp, approximately 200 m away from Volcano Creek. The proposed Permanent KM46 Camp will use the same potable water source as the KM46 Advanced Exploration Camp. The proposed Project changes are not expected to notably affect groundwater, which is discharging to the Creek. No change is expected, and the existing mitigation measures, commitments, and conditions are expected to remain sufficient. The Groundwater Quantity and Quality VC is excluded from further consideration.
	Groundwater Quality	●	○	○	
Surface Water Quantity and Quality	Surface Water Quantity	○	○	○	The proposed Project changes do not encroach on riparian habitat, and the incinerator is located at a sufficient distance from the closest unnamed tributary. The proposed Project changes are not expected to notably affect surface water, which is a tributary of Volcano Creek. No change is expected, and the existing mitigation measures, commitments, and conditions are expected to remain sufficient. The Surface Water Quantity and Quality VC is excluded from further consideration.
	Surface Water Quality	○	○	○	
Terrain and Soils	Terrain Stability and Morphology	○	○	○	Due to the limited additional land clearing activities required, the proposed Project changes are not expected to introduce any notable changes in relation to terrain stability, soil quantity and soil quality. The interactions and pathways of effects resulting from the proposed Project changes are anticipated to be consistent with what is characterized in the EAC Application and a marginal change from the effects identified in the Licence of Occupation Application. No change is expected, and the existing mitigation measures, commitments, and conditions are expected to remain sufficient. The Terrain and Soils VC is excluded from further consideration.
	Soil Quantity	○	○	○	
	Soil Quality	○	○	○	

Valued Component	Sub-Valued Components (if applicable)	Proposed Project Changes			Rationale
		Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Fish and Fish Habitat	Fish ⁴	○	○	○	The additional area required for the proposed Permanent KM46 Camp layout is located near an unnamed tributary of Volcano Creek. The tributary is non-fish-bearing. No change is expected, and the existing mitigation measures, commitments, and conditions are expected to remain sufficient. The Fish and Fish Habitat VC is excluded from further consideration.
	Aquatic Resources	○	○	○	
	Fish Habitat	○	○	○	
Vegetation and Ecosystems	Plant Species of Interest	○	●	○	Construction of the proposed Permanent KM46 Camp is expected to result in a direct loss of 4.97⁵ ha of vegetation and ecosystems. Compared to the Assessment Footprint, which is 2,275.8 ha (as defined in Chapter 18, Vegetation and Ecosystems Effects Assessment, Section 18.3.1.2, Assessment Footprint, of the EAC Application (Skeena Resources 2025a)), the proposed Project changes will further reduce habitat availability in the Local Assessment Area by 0.2%. The area to be cleared for the proposed Permanent KM46 Camp is located along the Eskay Creek MAR, an existing access road. The area to be cleared on the north side of the Eskay Creek MAR is located in the Wet Very Cold Engelmann Spruce - Subalpine Fir Subzone (ESSFwv) biogeoclimatic unit and does not overlap with wetlands or blue-listed ecological communities. Therefore, the proposed Project changes are predicted to result in a negligible residual effect on vegetation and ecosystems. The camp location overlaps with the Stikine Invasive Plant Management Area (IPMA; Northwest Invasive Plant Council 2012). Six species of plants categorized as invasive by the IPMA have been identified along the existing Eskay Creek MAR: common tansy, orange-red king devil, oxeye daisy, white-sweet clover, and yellow king devil.
	Plant Communities of Interest	○	●	○	
	Ecosystems	○	●	○	
	Vegetation Quality	○	●	○	

⁴ including salmon and hooligan [eulachon]

⁵ The buffer zone associated with the proposed Mine Camp Area is conservatively assumed to be lost in this assessment, however, there is currently no planned disturbance within the Riparian Management Areas.

Valued Component	Sub-Valued Components (if applicable)	Proposed Project Changes			Rationale
		Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Vegetation and Ecosystems (<i>cont'd.</i>)	Vegetation Quality (<i>cont'd.</i>)	○	●	○	Best management practices for vegetation, ecosystem management and invasive species, as outlined in the "Eskay Creek Major Mine Permitting: Vegetation Management Plan" (Skeena Resources 2025b), will be implemented before clearing activities. Based on the above, the interactions and pathways of effects resulting from the proposed Project changes are anticipated to be consistent with what is characterized in the EAC Application. The existing mitigation measures, commitments and conditions are expected to remain sufficient. As a result, the effects from the proposed Project changes on the Vegetation and Ecosystems VC are anticipated to be the same as what was previously assessed, and the conclusions in the EAC Application remain unchanged. The Vegetation and Ecosystems VC is excluded from further consideration.

Valued Component	Sub-Valued Components (if applicable)	Proposed Project Changes			Rationale
		Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Wildlife and Wildlife Habitat	Moose (kedā)	○	●	○	Construction of the proposed Permanent KM46 Camp is expected to result in a direct loss of 4.97⁶ ha of wildlife habitat. Compared to the Assessment Footprint which is 2,275.8 ha (as defined in Chapter 19, Wildlife and Wildlife Habitat Effects Assessment, Section 19.3.1.2, Assessment Footprint, of the EAC Application (Skeena Resources 2025a)), the proposed Project changes will further reduce habitat availability in the Local Assessment Area by 0.2%. The area to be cleared on the north side of the Eskay Creek MAR does not interact with any sensitive wildlife features and is subject to reduced ecological effectiveness due to the proximity to the existing access road. Therefore, the proposed change is predicted to result in a negligible residual effect on wildlife, including species at risk. Best management practices for wildlife management, as outlined in the "Eskay Creek Revitalization Project: Wildlife Management and Monitoring Plan" (Skeena Resources 2025c) will be implemented prior to clearing activities and will include pre-disturbance wildlife surveys. General measures to minimize disturbances to wildlife and wildlife habitat due to vegetation removal and increased use of vehicles and roads during the proposed Permanent KM46 Camp construction may include: • Avoid key habitat features if identified (e.g., dens, salt licks, nests, hibernacula, roosts, and breeding sites). • Avoid clearing vegetation during wildlife-sensitive periods. • Minimize disturbance of adjoining vegetation communities (e.g., fall trees away from undisturbed areas and ensure clear demarcation of boundaries and access points to guide construction personnel, preventing inadvertent encroachment into sensitive areas). • Minimize direct wildlife habitat loss by reusing existing disturbances and completing timely reclamation, if required.
	Mountain Goat (išbā)	○	●	○	
	Furbearers	○	●	○	
	Bats (et'anesjide)	○	●	○	
	Amphibians	○	○	○	
	Raptors	○	●	○	
	Migratory Birds, Upland Breeding Birds	○	●	○	

⁶ The buffer zone associated with the proposed Mine Camp Area is conservatively assumed to be lost in this assessment, however, there is currently no planned disturbance within the Riparian Management Areas.

Valued Component	Sub-Valued Components (if applicable)	Proposed Project Changes			Rationale
		Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Wildlife and Wildlife Habitat (cont'd.)	Migratory Birds, Waterbirds	○	○	○	- Enforcement of speed limits to reduce the potential for vehicle-wildlife collisions (a maximum speed limit of 60 kilometers per hour (km/hr) has been set for the Eskay Creek MAR). - Recording and reporting wildlife sightings, interactions, and incidents. The mechanisms and effect pathways resulting from the proposed Project changes are anticipated to be consistent with what is characterized in the EAC Application and the existing mitigation measures, commitments, and conditions are expected to remain sufficient. As a result, the effects from the proposed Project changes on the Wildlife and Wildlife Habitat VC are anticipated to be the same as what was previously assessed, and the conclusions in the EAC Application remain unchanged. The Wildlife and Wildlife Habitat VC is excluded from further consideration.
Human Health	Mental Health and Well-being	○	○	○	The relocation of the incinerator to the opposite side of the Eskay Creek MAR is not expected to notably change the emissions levels associated with the incinerator, which were considered in the Eskay Creek Amendment Application to <i>Environmental Management Act</i> Permit PA-112023. The health effects on the housing facilities are expected to be reduced due to the increase in distance between the incinerator and the Camp. Additionally, the relocation of the Project Camp further away from the TMSF Area is expected to reduce exposures to PM_{2.5}, PM₁₀ and NO₂. The increase in housing capacity is not anticipated to materially change the risk of disease exposure, accidents and injuries, health effects are anticipated to be comparable to what was previously assessed in the EAC Application (Skeena Resources 2025a). A HSMP has been developed for the Eskay Creek Revitalization Project and submitted to the EAO, which includes monitoring and adaptive management. A full-time ACP is onsite at all times and medical services will be expanded as the construction workforce increases. The existing mitigation measures, commitments and conditions are expected to remain sufficient given the increase in camp capacity from the original assessment. The Human Health VC is excluded from further consideration.
	Absence of Infectious Diseases	●	○	○	
	Absence of Chronic Disease	●	○	○	
	Absence of Accidents and Injuries	●	○	○	
	Nutrition	○	○	○	

Valued Component	Sub-Valued Components (if applicable)	Proposed Project Changes			Rationale
		Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Infrastructure and Services	-	○	○	○	The proposed Project changes are not expected to introduce any change in relation to employment and in-migration associated with the workforce, use of roads and waste management, water management and electric supplies. The existing mitigation measures, commitments, and conditions are expected to remain sufficient. The Infrastructure and Services VC is excluded from further consideration.
Non-Traditional Land and Resource Use	Tenured Land and Resource Use	○	○	○	The proposed Project changes are not expected to introduce any change in potential effects to tenured and public land and resource use. The proposed Project changes do not overlap with parks and protected areas or private properties. The additional area to be cleared is located near the Eskay Creek MAR and within the Utility Corridor Land Tenure. The existing mitigation measures, commitments, and conditions are expected to remain sufficient. The Land and Resource Use VC is excluded from further consideration.
	Public Land and Resource Use	○	○	○	
	Parks and Protected Areas	○	○	○	
	Private Property	○	○	○	
Visual Resources	Visual Quality	○	●	●	While the location of certain construction activities and Camp facilities would be slightly varied due to the proposed Project changes, they are not expected to introduce any notable changes in visual quality in consideration of the Project in its entirety. As all light-generating components were assessed as a single entity with no consideration to locations of individual components in the EAC Application (Skeena Resources 2025a), the location of the Permanent Camp of the Project has no material consequence to the assessment's conclusions since the proposed Project changes are not introducing different types of light-generating components. Therefore, the proposed Project changes are not expected to introduce any notable changes in nighttime ambient light. The existing mitigations, commitments, and conditions are expected to remain sufficient. The Visual Resources VC is excluded from further consideration.
	Nighttime Ambient Light	○	●	●	

Valued Component	Sub-Valued Components (if applicable)	Proposed Project Changes			Rationale
		Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Employment and Economy	-	○	○	○	The proposed Project changes are not expected to introduce any change in employment, income, contributions to economic activities in the region, taxes or spending on goods and services. The existing mitigations, commitments, and conditions are expected to remain sufficient. The Employment and Economy VC is excluded from further consideration.
Heritage Resources	Archaeological Sites	○	●	○	Construction of the proposed Permanent KM46 Camp is expected to require clearing of an additional 4.97 ha. Archaeological Impact Assessments (AIAs) were conducted along the Eskay Creek MAR in 2022 under BC's <i>Heritage Conservation Act</i> (RSBC 1996, c 187) Heritage Inspection Permits 2020-0195 and 2022-0313, which covered the entire areas associated with the proposed Permanent KM46 Camp. Shovel testing was conducted along the Volcano Creek Valley, including at STL80 and STL136, which were conducted near KM45 of the Eskay Creek MAR, with no archaeological material recovered. Additional AIAs were conducted within the KM46 Advanced Exploration Camp footprint in 2025, including shovel testing, and no archaeological materials or features were identified. A Fossil Impact Assessment (FIA) was completed for the Eskay Creek Revitalization Project in 2022, which covered the areas associated with the proposed Permanent KM46 Camp. During the FIA no fossil occurrences were located near the Camp Area. While unlikely based on the results of the surveys undertaken to date in, and near the Camp Area, the proposed Project changes have the potential to interact with undiscovered heritage or archeological resources. The TCG has developed procedures for handling archaeological chance finds within Tahltan Territory (TCG 2019), which are in alignment with the requirements of the BC Archaeology Branch. In the event of a chance find, the procedures outlined in the TCG-Archaeological Chance Find Procedures will be immediately implemented.
	Palaeontological Sites	○	●	○	
	Historical/Traditional Use Sites	○	●	○	

Valued Component	Sub-Valued Components (if applicable)	Proposed Project Changes			Rationale
		Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Heritage Resources (cont'd.)	Historical/Traditional Use Sites (cont'd.)	○	●	○	Best management practices for heritage and archeological resources, as outlined in the "Eskay Creek Major Mine Permitting: Archaeological and Cultural Heritage Management Plan" (Skeena Resources 2025d) will be implemented prior to clearing activities and will include additional AIAs if applicable. The mechanisms and effect pathways resulting from the proposed Project changes are anticipated to be consistent with what is characterized in the EAC Application and the existing mitigation measures, commitments, and conditions are expected to remain sufficient. As a result, the effects from the proposed Project changes on the Heritage Resources VC are anticipated to be the same as what was previously assessed, and the conclusions in the EAC Application remain unchanged. The Heritage Resources VC is excluded from further consideration
Current and Future Use of Land and Resources for Traditional Purposes	-	○	○	○	The proposed Project changes are not expected to introduce any changes in opportunities to take part in traditional practices, access to hunting, trapping, gathering, fishing and other important areas and change to quality or abundance of country foods. The additional area to be cleared is located near the Eskay Creek MAR and within the Utility Corridor Land Tenure, and subject to reduced ecological effectiveness due to the proximity to the existing access road. The existing mitigations, commitments, and conditions are expected to remain sufficient. The Current and Future Use of Land and Resources for Traditional Purposes VC is excluded from further consideration.

Valued Component	Sub-Valued Components (if applicable)	Proposed Project Changes			Rationale
		Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Quiet Enjoyment of Land	-	○	○	○	The proposed Project changes are not expected to introduce any changes to the traditional land use activities and cultural practices of Engaged Indigenous Nations. The additional area to be cleared is located near the Eskay Creek MAR and within the Utility Corridor Land Tenure, and subject to reduced ecological effectiveness due to the proximity to the existing access road. The existing mitigations, commitments, and conditions are expected to remain sufficient. The Quiet Enjoyment of Land VC is excluded from further consideration.

Notes:

Empty circle (○): an interaction is not expected; no further assessment is warranted.

Half-filled circle (◐): an interaction is possible but the potential for adverse effects resulting from the proposed Project changes are the same as (or less than) the effects assessed in the EAC Application and can be managed by the existing mitigation measures and management plans; a succinct rationale is provided but no further assessment is warranted.

Filled circle (●): an interaction is likely and there is a potential for adverse effects compared to what was considered in the EAC Application, or because new interactions with a non-negligible potential for adverse effects were identified; further assessment is warranted.

5.2 Potential Interactions with Additional Section 25(2) Matters

Table 5.1-2 identifies potential interactions between the proposed Project changes and the section 25(2) matters, as defined in the EAA.

The rationale for each interaction rating is detailed in Table 5.1-2: either excluding (○ or ●) the section 25(2) matter from further consideration, or including (●) the Section 25(2) matter for further consideration, if applicable.

Table 5.1-2: Potential Interactions between Section 25(2) Matters and the Proposed Project Changes

Section 25(2) Matters	Proposed Project Changes			Rationale
	Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
a. positive and negative direct and indirect effects of the reviewable project, including environmental, economic, social, cultural and health effects and adverse cumulative effects	N/A	N/A	N/A	Considered in Table 5.1-1 and in Section 5.2
b. risks and uncertainties associated with those effects, including the results of any interaction between effects	N/A	N/A	N/A	Considered in Table 5.1-1 and in Section 5.2
c. risks of malfunctions or accidents	○	○	○	The EAC Application (Skeena Resources 2025a) considered several accidents and malfunctions scenarios. No changes to the EAC Application's conclusions would occur as a result of the proposed Project changes. This section 25(2) matter is excluded from further consideration.

Section 25(2) Matters	Proposed Project Changes			Rationale
	<i>Increase in Housing Capacity</i>	<i>Land Clearing</i>	<i>Incinerator Relocation</i>	
d. disproportionate effects on distinct human populations, including populations identified by gender	○	○	○	Project activities associated with the proposed Project changes are not expected to alter demand for labour, goods, services, community housing, infrastructure or payment of taxes. Skeena Resources will continue to support local workers and businesses through various programs, including working collaboratively with First Nations to identify and implement opportunities for employment and participation by First Nation businesses in the provision of goods and services for the Project. No change in residual effects on disproportionate effects on distinct human populations, including populations identified by gender, is expected as a result of the proposed Project changes. This section 25(2) matter is excluded from further consideration.
e. Effects on biophysical factors that support ecosystem function	○	●	○	The proposed Project changes are located along the Eskay Creek MAR, an existing access road. The area to be cleared does not overlap with critical habitats, blue-listed ecological communities and is subject to reduced ecological effectiveness due to the proximity to the existing access road. The proposed Project changes would not introduce any notable effects in relation to habitat fragmentation. The existing mitigation measures, commitments, and conditions are expected to remain sufficient. Therefore, the proposed Project changes are not expected to introduce any notable changes in relation to biophysical factors that support ecosystem function. This section 25(2) matter is not considered further.
f. effects on current and future generations	○	○	○	The proposed Project changes do not change the temporal nature of any potential effects. This section 25(2) matter is excluded from further consideration.
g. consistency with any land use plan of the government or an Indigenous nation if the plan is relevant to the assessment [...]	○	○	○	The proposed Project changes do not require a zoning change and are consistent with existing plans. This section 25(2) matter is excluded from further consideration.

Section 25(2) Matters	Proposed Project Changes			Rationale
	Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
h. greenhouse gas emissions, including the potential effects on the province being able to meet its targets under the Greenhouse Gas Reduction Targets Act	○	●	○	While the GHG emissions associated with the incinerator at the Camp location were not assessed in the EAC Application (Skeena Resources 2025a), it is not expected to introduce any material change in GHG emissions in consideration of the Project in its entirety. The proposed Project changes would relocate the existing approved incinerator and not result in a new incinerator. The additional clearing activities are constrained to 4.97 ha and are also not expected to introduce any notable changes in GHG emissions. The existing mitigations, commitments, and conditions are expected to remain sufficient. This section 25(2) matter is not considered further.
i. alternative means of carrying out the project that are technically and economically feasible, including through the use of the best available technologies, and the potential effects, risks and uncertainties of those alternatives	○	○	○	The EAC Application (Skeena Resources 2025a) considered alternatives means of carrying out the Project. No changes to the EAC Application's conclusions are expected as a result of the proposed Project changes. This section 25(2) matter is excluded from further consideration.
j. potential changes to the reviewable project that may be caused by the environment	○	○	○	The EAC Application (Skeena Resources 2025a) considered potential changes to the Project that may be caused by the environment. Mitigation measures identified in the EAC Application are applicable to the proposed Project changes. No changes to the assessment are expected as a result of the proposed Project changes. This section 25(2) matter is excluded from further consideration.
k. other prescribed matters	N/A	N/A	N/A	There are no other prescribed matters for consideration.

Notes:

Empty circle (○): an interaction is not expected; no further assessment is warranted.

Half-filled circle (◐): an interaction is possible but the potential for adverse effects resulting from the proposed Project changes are the same as (or less than) the effects assessed in the EAC Application and can be managed by the existing mitigation measures and management plans; a succinct rationale is provided but no further assessment is warranted.

Filled circle (●): an interaction is likely and there is a potential for adverse effects compared to what was considered in the EAC Application, or because new interactions with a non-negligible potential for adverse effects were identified; further assessment is warranted.

5.3 Potential Interactions with Effects within Federal Jurisdiction

Table 5.1-3 identifies potential interactions between the proposed Project changes and the effects within federal jurisdiction.

The rationale for each interaction rating is detailed in Table 5.1-3: either excluding (○ or ●) the effects within federal jurisdiction from further consideration, or including (●) the factor of federal interest for further consideration, if applicable.

Table 5.1-3: Potential Interactions between the Effects within Federal Jurisdiction and the Proposed Project Changes

Effects within Federal Jurisdiction	Proposed Project Changes			Rationale
	Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Effects Identified under Subsection 2(a) of the IAA				
Fish and fish habitat (as defined in subsection 2(1) of the <i>Fisheries Act</i> .)	○	○	○	The additional area required for the proposed Permanent KM46 Camp layout is located near a non-fish-bearing unnamed tributary of Volcano Creek. Therefore, the proposed Project changes are unlikely to have the potential to interact with fish and fish habitat and aquatic species. This effect is excluded from further consideration.
Aquatic species (as defined in subsection 2(1) of the <i>Species at Risk Act</i>)	○	○	○	
Migratory birds (as defined in subsection 2(1) of the <i>Migratory Birds Convention Act, 1994</i>)	○	●	○	The proposed Project changes are located along the Eskay Creek MAR, an existing access road. The area to be cleared does not overlap with critical habitats and is subject to reduced ecological effectiveness due to the proximity to the existing access road. Therefore, the proposed Project changes are unlikely to have the potential to interact with migratory birds. This effect is excluded from further consideration.
Effects Identified under Subsection 2(b) of the IAA				
Federal lands	○	○	○	The proposed Project changes are not overlapping with federal lands. This effect is excluded from further consideration.
In a Province other than the one where the physical activity or the designated Project is being carried out	○	○	○	The proposed Project changes would not have an impact in another Province or territory. This effect is excluded from further consideration.
Outside Canada	○	○	○	The proposed Project change would not have effects outside of Canada. This effect is excluded from further consideration.

Effects within Federal Jurisdiction	Proposed Project Changes			Rationale
	Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Effects Identified under Subsection 2(c), (d) and (e) of the IAA				
Indigenous Peoples - Physical and cultural heritage	○	●	○	The proposed Project changes are unlikely to have the potential to interact with undiscovered heritage or archeological resources,as discussed in Table 5.1-1. Best management practices for heritage and archeological resources, as outlined in the “Eskay Creek Major Mine Permitting: Archaeological and Cultural Heritage Management Plan” (Skeena Resources 2025d) will be implemented prior to clearing activities and will include additional AIAs if applicable. The existing mitigation measures (including the implementation of Chance Find Procedures in case of unexpected discoveries), commitments, and conditions are expected to remain sufficient. As a result, the effects from the proposed Project changes on Indigenous Peoples’ physical and cultural heritage and structure, site or thing that is of historical, archaeological, paleontological or architectural significance are anticipated to be the same as what was previously assessed, and the conclusions in the EAC Application remain unchanged. This effect is excluded from further consideration.
Indigenous Peoples - Structure, site or thing that is of historical, archaeological, paleontological or architectural significance	○	●	○	
Indigenous Peoples - Current use of lands and resources for traditional purposes	○	○	○	The proposed Project changes are not expected to introduce any notable changes in Indigenous Peoples’ current use of lands and resources for traditional purposes. The additional area to be cleared is located near the Eskay Creek MAR, within the Utility Corridor Land Tenure, and subject to reduced ecological effectiveness due to the proximity to the existing access road. The existing mitigation measures, commitments, and conditions are expected to remain sufficient. This effect is excluded from further consideration.
Indigenous Peoples - Health, social or economic conditions	●	○	●	The relocation of the incinerator to the opposite side of the Eskay Creek MAR is not expected to notably change the emissions levels associated with the incinerator, which were considered in the Eskay Creek Amendment Application to <i>Environmental Management Act</i> Permit PA-112023. The health effects on the housing facilities are expected to be reduced due to the increase in distance between the incinerator and the Camp. The increase in housing capacity is not anticipated to materially change the risk of disease exposure, accidents and injuries, health effects are anticipated to be comparable to what was previously assessed in the EAC Application (Skeena Resources 2025a). The existing mitigation measures, commitments and conditions are expected to remain sufficient. This effect is excluded from further consideration.

Effects within Federal Jurisdiction	Proposed Project Changes			Rationale
	Increase in Housing Capacity	Land Clearing	Incinerator Relocation	
Effects Identified pursuant to Subsection 79(2) of SARA				
Birds - Raptors	○	●	○	The proposed Project changes are located along the Eskay Creek MAR, an existing access road. The area to be cleared does not overlap with critical habitats and is subject to reduced ecological effectiveness due to the proximity to the existing access road.
Birds - Waterbirds	○	○	○	
Birds – Upland Breeding Birds	○	●	○	
Amphibians	○	○	○	Therefore, the proposed Project changes are unlikely to have the potential to interact with species at risk.
Mammals	○	●	○	This effect is excluded from further consideration.

Notes:

Empty circle (○): an interaction is not expected; no further assessment is warranted.

Half-filled circle (◐): an interaction is possible but the potential for adverse effects resulting from the proposed Project changes are the same as (or less than) the effects assessed in the EAC Application and can be managed by the existing mitigation measures and management plans; a succinct rationale is provided but no further assessment is warranted.

Filled circle (●): an interaction is likely and there is a potential for adverse effects compared to what was considered in the EAC Application, or because new interactions with a non-negligible potential for adverse effects were identified; further assessment is warranted.

6.0 TAHLTAN NATION INDIGENOUS INTERESTS

The Tahltan are the Nahane or the People of the West, and the Tahltan Nation social system is based on two clans, the Crow/Tsesk'iya and the Wolf/Ch'ioyone. TCG, the governing body of the Tahltan Nation, represents approximately 5,000 members, living on and off reserves. Currently, less than half of Tahltan Nation members reside in the communities of Dease Lake/Tat'ah, Iskut/Luwe' Chōn, and Telegraph Creek/Tl'egōhīn.

The Project is located within Tahltan Territory. The closest Indigenous community is the Tahltan community of Iskut (135 km north; 170 km via road). Additional Tahltan communities in Tahltan Territory located north/northeast of the Project include Dease Lake (190 km northeast; 253 km via road), which includes both Tahltan and non Tahltan residents, and Telegraph Creek (142 km north; 362 km via road).

For the Environmental Assessment of the Project, the Tahltan Nation and Government of BC signed the “*Declaration Act* Consent Decision-Making Agreement for the Eskay Creek Project” (*Declaration Act* Agreement; 2022) under section 7 of the *Declaration on the Rights of Indigenous Peoples Act* (SBC 2019, c 44), on 6 June 2022. The purpose of the Declaration Act Agreement (2022) was to set out a consent-based decision-making process for the Environmental Assessment of the Project, provide clarity and transparency for the governments’ respective processes for assessments and decision-making in relation to the EAC Application, as well as set out the requirement that Tahltan consent before the Project could proceed.

TCG completed their assessment of the effects of the Project on Tahltan Nation through the Tahltan Risk Assessment (TRA). The spatial assessment boundaries were defined and designated by TCG and represent Areas of Interest (AOI) where a wholistic approach to determining potential effects on Tahltan Values, Core Priorities, Risk Assessment Factors, and Sustainability Requirements. These areas were defined based on Tahltan Knowledge and Values.

The assessment concluded that regional effects were primarily associated with socio-cultural conditions, infrastructure and services, human health, employment and the economy, and culture and way of life. Potential cumulative effects were linked to the combined influence of these effects within each AOI, as well as the pace and scale of regional development. The TRA also identified that the Project is not aligned with several Tahltan Sustainability Requirements and Tahltan Risk Assessment Factors, particularly in relation to groundwater and surface water quality and quantity at the site specific to landscape level for the Project watersheds and waterways draining into the Unuk River. A number of potential mitigations and conditions are identified in the TRA to address uncertainties with the predictive water models through a field verification program requiring the Satisfaction of Tahltan, where the models need to be verified prior to the TMSF and MRSA being substantially started to ensure hydraulic containment mitigations are applied to address predictive models seepage quantity and pathway uncertainties early in the Project. Many Sustainability Requirements and Risk Assessment Factors were assessed as is alignment with the Project, including the restoration of safe, easy, and consistent access to lands by Tahltan for way of life and quiet enjoyment of land practices, sociocultural and economic legacies, and other positive effects.

Recommendations were provided for consideration by Tahltan Leadership from the TCG Lands Director to maintain reduced effects from the Project and ensure alignment with Tahltan Sustainability Requirements throughout the life of the Project. TCG worked with the EAO to develop conditions for inclusion in EAC #M26-01 to mitigate and accommodate the potential Project impacts. Additionally, the Impact Benefit

Agreement between Skeena Resources and TCG includes additional economic, social, cultural, and environmental conditions to further mitigate and accommodate the potential Project impacts.

As discussed in Section 5.0, Identification of Potential Interactions with Proposed Project Changes, the proposed Project changes are not expected to alter the conclusions of the EAC Application. As a result, no notable interactions between the Tahltan Nation's interests and the proposed Project changes are expected.

7.0 TSETSAUT SKI KM LAX HA NATION INDIGENOUS INTERESTS

The TSKLH Nation territory, Laxwiiip, covers an area of approximately 19,800 km², which extends from the north side of the Cranberry River in the south, along the Nass and Bell-Irving rivers, to Beaver Pond in the Ningunsaw Pass in the north. The Project is located near the northwest edge of TSKLH Territory.

In the EAC Application (Skeena Resources 2025a), the assessment of effects to TSKLH's Interests identified two Project residual effects:

- Changes to governance and well-being; and
- Changes to land use experience and practices.

Following the application of proposed mitigation and management measures, the Project residual effects on TSKLH Interests were expected to be Low magnitude during the Construction and Operations phases of the Project, relating primarily to transportation activities along Highway 37/37A. Positive effects on TSKLH Interests resulting from Project-related employment and contracting opportunities were also identified. The residual cumulative effects were expected to be of Low magnitude to governance and well-being and Moderate magnitude to land use experience and practices.

As discussed in Section 5.0, Identification of Potential Interactions with Proposed Project Changes, the proposed Project changes are not expected to alter the conclusions of the EAC Application. As a result, no notable interactions between TSKLH's interests and the proposed Project changes are expected, and the conclusions in the EAC Application remain unchanged.

8.0 NISGA'A LISIMS GOVERNMENT INDIGENOUS INTERESTS

The "Nisga'a Final Agreement" (1999) is a treaty and land claims agreement within the meaning of sections 25 and 35 of the *Constitution Act, 1982*. The "Nisga'a Final Agreement" was given effect by BC in 1999 under the *Nisga'a Final Agreement Act* (SBC 1999, c 2), and by Canada in 2000 under the *Nisga'a Final Agreement Act* (SC 2000, c 7). The "Nisga'a Final Agreement" grants the Nisga'a Nation a number of rights, including the right to self-government, law-making authority, and rights over land and resources in the Nass Area. Chapter 10 of the "Nisga'a Final Agreement" specifies the requirements for environmental assessments for projects that may reasonably be expected to have adverse environmental effects on residents of Nisga'a Lands, Nisga'a Lands, or Nisga'a interests.

The transportation route along Highway 37/37A traverses the Nass Area and the Nass Wildlife Area to the ports, located in the District of Stewart. Skeena Resources and NLG collaboratively determined levels of interactions for the Project and the Nass Wildlife Area with Nisga'a Treaty rights in the Application Development phase. Through consideration of these interactions, assessment of potential effects and application of mitigations, the EAC Application (Skeena Resources 2025a) concluded that negative residual effects were not expected as a result of the Project. Positive effects were identified as possible for Nisga'a citizens' employment and income, contracting opportunities and earnings, and future Nisga'a citizens' economic opportunities.

The proposed Project changes would not impact Project transportation activities along Highway 37/37A to the ports in the District of Stewart. As a result, the conclusions in the EAC Application in relation to Nisga'a Nation remain unchanged.

9.0 GITANYOW NATION INDIGENOUS INTERESTS

Gitanyow Nation territory is located south of the Project site in the Upper Nass area. The mine site is located outside and to the northwest of Gitanyow Nation Lax'yip (territory). The proposed concentrate haul route along Highway 37/37A to Stewart, passes through Wilp Wii'litsxw, Wilp Malii Wilp Gamlakyeltxw, Wilp Gwinuu, and Wilp Gwaas Hla'am (Gitanyow Nation and Province of BC 2012) of the Gitanyow Lax'yip.

Gitanyow Nation engaged with Skeena Resources to undertake an assessment of the Project under its Wilp Sustainability Assessment (WSA) Process. The WSA Report was prepared by the Gitanyow Nation, focused on Project transportation along Highway 37/37A to the ports in the District of Stewart

The proposed Project changes would not impact Project transportation activities along Highway 37/37A to the ports in the District of Stewart. As a result, Skeena is of the view that the effects assessed by Gitanyow Nation under the WSAP would remain unchanged.

10.0 MÉTIS NATION BRITISH COLUMBIA INDIGENOUS INTERESTS

MNBC was formed and incorporated under the Métis Provincial Council of British Columbia in 1996 to represent and pursue British Columbia Métis interests. MNBC was consulted and the effects to Métis Nation were assessed in relation to federal requirements from the Impact Assessment Agency of Canada. No comments were received from MNBC during the Environmental Assessment Process.

As discussed above, the proposed Project changes are not expected to introduce any notable changes in traffic, employment, income, contributions to economic activities in the region, taxes or spending on goods and services. As a result, no notable interactions between the MNBC's interests and the proposed Project changes are expected, and the conclusions in the EAC Application remain unchanged.

11.0 SUMMARY

This Amendment Application has been developed to support the relocation of the Permanent Camp currently approved to be located near the TMSF Area in the EAC #M-26-01 CPD and Schedule 1 of the DS, to the location of the KM46 Advanced Exploration Camp. This Amendment Application assesses the potential effects of the proposed Camp relocation on the VCs assessed in the original EAC Application (Skeena Resources 2025a) and whether the proposed Project changes would result to changes in the effects as presented in the EAC Application, including to VCs, additional section 25(2) matters of the EAA, and effects within federal jurisdiction as set out in Section 2 and Section 22(1) of the IAA.

This Amendment Application seeks to establish a Mine Camp Area. This area would include the proposed Permanent KM46 Camp, which would increase the capacity of the existing approved KM46 Advanced Exploration Camp by up to 500 beds. For the purpose of the assessment the Mine Camp Area would conservatively increase disturbance by up to 4.97 ha, which allows for a buffer around the existing approved KM46 Advanced Exploration Camp, and the incinerator and a waste sorting and maintenance area on the northern side of the Eskay Creek MAR.

Based on the following rationale, this Amendment Application concludes that the proposed Project changes are not predicted to change the predicted effects to the VCs assessed in the EAC Application:

- The proposed Project changes do not materially change the types of activities associated with the construction and operation of the camp at KM46.
- The proposed Project changes do not encroach on riparian habitat, are not located near a fish-bearing stream, and are not expected to introduce changes in relation to groundwater and surface water quantity and quality.
- The proposed Project changes are located along the Eskay Creek MAR, which is an existing access road. The area to be cleared does not overlap with critical habitats, blue-listed ecological communities, and is subject to reduced ecological effectiveness due to the proximity to the existing access road.
- From an air quality and noise perspective, the potential effects on the Camp are expected to be reduced compared to the existing approved KM46 Advanced Exploration Camp due to the increase in distance between the incinerator's location and the housing facilities. In addition, effects would be notably decrease from the location of the Permanent Camp that is currently approved in the EAC near the TMSF.
- In the event of a chance find, the procedures outlined in the TCG-Archaeological Chance Find Procedures will be immediately implemented.

Based on the above, the mechanisms and pathways of effects resulting from the proposed Project changes are anticipated to be consistent with what is characterized in the EAC Application, and the existing mitigation measures, commitments and conditions remain sufficient.

12.0 REFERENCES

Legislation and Regulations

Constitution Act, 1982, Schedule B to the Canada Act 1982, 1982, c 11 (United Kingdom).

Declaration on the Rights of Indigenous Peoples Act, SBC 2019, c 44.

Environmental Assessment Act, SBC 2018, c 51.

Environmental Management Act, SBC 2003, c 53.

Heritage Conservation Act, RSBC 1996, c 187.

Impact Assessment Act, SC 2019, c 28, s 1.

Integrated Pest Management Act, SBC 2003, c 58.

Nisga'a Final Agreement Act, SBC 1999, c 2.

Nisga'a Final Agreement Act, SC 2000, c 7.

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Other Sources

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