

BRUCEJACK GOLD MINE PROJECT: Implementation Schedule (as per CEAA Decision Statement Condition 10.3)

Revised: February 24, 2017

#	Condition	Commencement Date	Completion Date	Comment
2	General Conditions			
2.1	The Proponent shall, throughout all phases of the Designated Project, ensure that its actions in meeting the conditions set out in this Decision Statement are informed by the best available information and knowledge, including community and Aboriginal traditional knowledge, are based on validated methods and models, are undertaken by qualified individuals, and have applied the best available economically and technologically feasible measures.	Already implemented	July 2040	
2.2	The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:			Consultation will be guided by the Aboriginal Consultation Plan developed by Pretivm, as a condition of their Environmental Assessment Certificate, with review and input from First Nations. Consultation activities will also be directed per Impact Benefit Agreement established with the Nisga'a Nation, and those that may be established with the Tsetsaut/Skii km Lax Ha, and Tahltan Nation.
	2.2.1 Provide a written notice of the opportunity for the party or parties being consulted to present their views on the subject of the consultation;	Already implemented	July 2040	
	2.2.2 Provide sufficient information and a reasonable period of time to permit the party or parties being consulted to prepare their views;	Already implemented	July 2040	
	2.2.3 Provide a full and impartial consideration of any views presented by the party or parties being consulted; and	Already implemented	July 2040	
	2.2.4 Advise the party or parties that have provided comments on how the views and information received have been considered by the Proponent.	Already implemented	July 2040	
2.3	The Proponent shall, where consultation with Aboriginal groups is a requirement of a condition set out in this Decision Statement, and prior to initiating that consultation, communicate with each Aboriginal group to determine the manner by which to satisfy the consultation requirements referred to in condition 2.2.	June 8, 2015	July 13, 2015	Consultation will be guided by the Aboriginal Consultation Plan developed by Pretivm, as a condition of their Environmental Assessment Certificate, with review and input from First Nations. Consultation activities will also be directed per Impact Benefit Agreements established with the Nisga'a Nation, and those that may be established with the Tsetsaut/Skii km Lax Ha, and Tahltan Nation.
2.4	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:			
2.4.1	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);	September 5, 2015	July 2040	
	2.4.2 Where the results of the monitoring and analysis indicate issues with respect to the accuracy of the environmental assessment and/or the effectiveness of any mitigation measures that may lead to adverse environmental effects, identify the means by which the Proponent determines whether additional mitigation measures are required, including the need for consultation with other parties in reaching that determination; and	September 5, 2015	July 2040	Activity to be completed on an as-needed basis.
	2.4.3 If additional mitigation measures are required pursuant to condition 2.4.2, implement and monitor these additional mitigation measures pursuant to condition 2.4.1.	September 5, 2015	July 2040	Activity to be completed on an as-needed basis.

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2.5	The Proponent shall, from the reporting year where construction starts, submit to the Agency an annual report, including an executive summary of the annual report in both official languages. The annual report shall be submitted by the Proponent no later than March 31 following the reporting year. The Proponent shall document in the annual report:	March 31, 2016	March 31, 2041	
2.5.1	Implementation activities undertaken in the reporting year for each of the conditions set out in this Decision Statement;	March 31, 2016	March 31, 2041	
2.5.2	How it has considered and incorporated the factors set out in condition 2.1 in the implementation of the conditions set out in this Decision Statement;	March 31, 2016	March 31, 2041	
2.5.3	For conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent has considered any views and information that the Proponent received during or as a result of the consultation;	March 31, 2016	March 31, 2041	
2.5.4	The results of the follow-up program requirements identified in conditions 3.4, 5.4 and 6.8; and	March 31, 2016	March 31, 2041	
2.5.5	Any additional mitigation measures implemented or proposed by the Proponent, as determined under condition 2.4.	March 31, 2016	March 31, 2041	
2.6	The Proponent shall publish on the Internet, or any similar medium, the annual report and the executive summary referred to in condition 2.5, the archaeological and heritage resources management plan referred to in condition 7.1, and the implementation schedule and any updates or revisions to that schedule referred to in condition 10, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for twenty-five years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first.	Annual report: March 31, 2016 Heritage Management Plan: September 5, 2015 Implementation Schedule: September 5, 2015 and biannually thereafter	Annual report: March 31, 2038 Heritage Management Plan: July 2037 Implementation Schedule: Biannually until August 15, 2037	
2.7	The Proponent shall notify the Agency 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	As required	
2.8	In the event another party becomes the Proponent of the Designated Project, it is bound by the conditions set out in this Decision Statement.	As required	As required	
3	Fish and fish habitat			
3.1	The Proponent shall, for all effluent discharges, comply with the Fisheries Act, the Metal Mining Effluent Regulations, and any discharge limits for effluent set by British Columbia that meet or exceed the requirements of the Fisheries Act and the Metal Mining Effluent Regulations. In addition, the Proponent shall:	August 2015	July 2040	
3.1.1	Design and construct the perimeter ditching around the waste rock stockpile, mill building and portals to accommodate a 200-year rain-on-snow event;	September 5, 2015	August 2017	Design has been completed and approved by provincial government. Where facility construction interfered with ditching temporary piping and pumping is installed to provide adequate capacity for a 200-year rain-on-snow-event.

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3.1.2	Capture and divert surface drainage and mine water effluent to the water treatment plant for treatment prior to discharge into Brucejack Lake;	Surface drainage: March 2016 Mine water effluent: Water treatment plant currently operating	Surface drainage: July 2037 Mine water effluent: July 2037	Surface contact water ditches constructed, other than where temporary piping and pumping installed. Replacement of temporary measures by permanent drainage expected to be completed August 2017.
3.1.3	Immobilize tailings and deposit potentially acid generating rocks on the bottom of Brucejack Lake where they shall remain submerged at all times or in decommissioned stopes; and	April 2017	July 2035	This is an advancement of the Commencement Date, previously August 2017.
3.1.4	Use multiple turbidity curtains at the outlet of Brucejack Lake.	1st curtain was installed in 2014; two additional curtains installed in September 2015	September 2015	
3.2	The Proponent shall protect fish and fish habitat during all phases of the Designated Project, which shall include the implementation of mitigation measures to avoid causing harm to fish and fish habitat when using explosives or conducting activities in or around water frequented by fish, as well as on the Knipple Glacier.	Already implemented	July 2040	Existing water treatment plant is operational; Standard Operating Procedure and management plans related to Knipple Glacier and Emergency and Spill Response Plans in place.
3.3	The Proponent shall, during decommissioning, reclaim riparian habitats along the access road which shall include the planting of native plant species.	August 2035	July 2037	
3.4	The Proponent shall develop and implement a water quality and fish and fish habitat follow-up program that shall include:	Already implemented	July 2040	Monitoring will be as per Effluent Permit 107835 and an Aquatic Effects Monitoring Plan developed by Pretivm. MMER First Biological Monitoring Study Design developed in January 2017.
3.4.1	Monitoring the quality of water flowing from Brucejack Lake into Brucejack Creek to verify the accuracy of the water quality and fish and fish habitat predictions in the environmental assessment; and	Already implemented	July 2040	Monitoring will be as per Effluent Permit 107835 and the Aquatic Effects Monitoring Plan developed by Pretivm.
3.4.2	Determining whether mitigation measures implemented to protect the quality of water flowing from Brucejack Lake into Brucejack Creek and downstream fish and fish habitat are effective.	Already implemented	July 2040	Activity to be completed on an as-needed basis.
4	Migratory birds			
4.1	The Proponent shall carry out all phases of the Designated Project in a manner that protects 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 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.	September 5, 2015	July 2040	
4.2	The Proponent shall design and build the transmission line in a manner that prevents electrocution, discourages nesting and makes the transmission line more visible to migratory birds taking into account the Avian Power Line Interaction Committee's Suggested Practices for Avian Protection on Power Lines.	Construction began September 5, 2015	August 2017	

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5	Health and Aboriginal peoples			
5.1	The Proponent shall implement mitigation measures to manage air emissions of the Designated Project during all phases, including:	September 2015	July 2037	
5.1.1	Those mitigation measures required to comply with the Waste Discharge Regulation under British Columbia's Environmental Management Act for operational air emissions;	September 2015	July 2037	
5.1.2	Fugitive dust best management practices; and	September 2015	July 2037	
5.1.3	Use of low-sulphur diesel fuel equipment and pollution control equipment on mobile heavy equipment.	Already implemented	July 2037	
5.2	The Proponent shall, in consultation with the Nisga'a Nation and Tsetsaut/Skii km Lax Ha, monitor and assess any changes to ambient air quality at the Tsetsaut/Skii km Lax Ha Lodge that result from the Designated Project during all phases for particulate matter (10 microns in diameter or less) and fine particulate matter (2.5 microns in diameter or less) using the Canadian Ambient Air Quality Standards of the Canadian Council of Ministers of the Environment as a benchmark, as well as for nitrogen oxide, sulphur dioxide and carbon monoxide.	March 2016	July 2037	Annual monitoring report is being prepared for distribution and consultation.
5.3	The Proponent shall develop and implement, in consultation with the Nisga'a Nation and Tsetsaut/Skii km Lax Ha, a mechanism for receiving noise complaints due to noise caused by the Designated Project during all phases, and respond in a timely manner to any noise complaint received.	August 2015	December 2015	
5.4	The Proponent shall develop and implement, in consultation with the Nisga'a Nation and Tsetsaut/Skii km Lax Ha, a follow-up program based on the monitoring specified in condition 5.2 to evaluate the effectiveness of mitigation measures identified under condition 5.1. The follow-up program shall start with construction and ceases at the end of the decommissioning phase.	August 2015	July 2037	Follow-up to 2016 monitoring program to be consulted upon beginning in April 2017 following completion of annual monitoring report.
5.4.1	The Proponent shall inform the Nisga'a Nation and Tsetsaut/Skii km Lax Ha in cases of exceedances at the Tsetsaut/Skii km Lax Ha Lodge of the Canadian Ambient Air Quality Standards of the Canadian Council of Ministers of the Environment parameters specified in condition 5.2.	August 2015	July 2037	Activity to be completed on an as-needed basis.
6	Current use of lands and resources for traditional purposes			
6.1	The Proponent shall provide Aboriginal groups with the implementation schedule and any updates or revisions to that schedule as stated in condition 10 at the same time the Proponent provides the schedule to the Agency.	August 2015 and biannually thereafter	March 2037	Due March 31 st or as required.
6.2	The Proponent shall prohibit any hunting, fishing and trapping within the Project Area by the Proponent's employees and contractors hired by the Proponent, unless an employee or a contractor is provided access for traditional purposes as per condition 6.6 or for exercising rights as per condition 6.7.	Already implemented	July 2040	
6.3	The Proponent shall prohibit public access to the access road.	Already implemented	July 2037	
6.4	The Proponent shall impose speed limits on the access road taking into account provincial guidelines.	Already implemented	July 2037	
6.5	The Proponent shall construct and maintain gaps in snow banks large enough to provide passage for fauna, including ungulates and furbearers.	October 2015	July 2037	Activity completed on a seasonal basis during periods of snow cover

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6.6	The Proponent shall, following consultation with Tsetsaut/Skii km Lax Ha, provide access to the Project Area to the Tsetsaut/Skii km Lax Ha for traditional purposes, to the extent that such access is safe.	August 2015	July 2037	
6.7	The Proponent shall, following consultation with the Nisga'a Nation, provide access to the Project Area for the Nisga'a Nation to exercise rights under the Nisga'a Final Agreement, to the extent that such access is safe.	August 2015	July 2037	
6.8	The Proponent shall develop and implement, in consultation with the Nisga'a Nation and Tsetsaut/Skii km Lax Ha, a follow-up program to determine the effectiveness of the mitigation measures used to avoid mortality of fauna, including ungulates and furbearers, along the access road and to verify the accuracy of the environmental assessment.	April 2016	July 2040	In April 2016, Pretivm, Nisga'a, Tsetsaut/Skii km Lax Ha and Tahltan held the first wildlife advisory committee meeting. Pretivm proposed that this Wildlife committee would be an appropriate venue for discussion of the effectiveness of mitigation measures, wildlife mortalities, accuracy of impacts to wildlife and potential additional mitigation measures. No additional meeting occurred in 2016, the follow up program will be discussed during meetings in 2017.
7	Physical and cultural heritage and structures, sites or things of ... significance			
7.1	The Proponent shall develop and implement, in consultation with Aboriginal groups, an archaeological and heritage resources management plan for the Designated Project prior to construction. The archaeological and heritage resources management plan shall take into account British Columbia's Handbook for the Identification and Recording of Culturally Modified Trees. The archaeological and heritage resources management plan shall include:	Completed	Completed	
7.1.1	A description of structures, sites or things of historical, archaeological, paleontological or architectural significance (including Culturally Modified Trees) that may be encountered by the Proponent during construction;	Completed	Completed	
7.1.2	Procedures and practices for on-site monitoring of construction activities that may affect a structure, site or thing of historical, archaeological, paleontological or architectural significance (including a Culturally Modified Tree) and for the identification and removal of the resource; and	Completed	Completed	
7.1.3	A chance find protocol if a previously unidentified structure, site or thing of historical, archaeological, paleontological or architectural significance (including a Culturally Modified Tree) is discovered by the Proponent or brought to the attention of the Proponent by an Aboriginal group or another party during construction.	Completed	Completed	
8	Species at risk			
8.1	The Proponent shall conduct pre-clearing surveys to determine distribution of Little Brown Myotis (<i>Myotis lucifugus</i>) and Northern Myotis (<i>Myotis septentrionalis</i>), and establish a 50-metre buffer zone around active hibernacula and active roosts.	September 2015	September 2017	No hibernacula found during pre-clearing surveys.
8.2	The Proponent shall, prior to construction and throughout all phases of the Designated Project, install and maintain roosting structures to offset if there is loss of Little Brown Myotis (<i>Myotis lucifugus</i>) and Northern Myotis (<i>Myotis septentrionalis</i>) bat roosting habitat.	September 2015	July 2040	No bat roosting habitat structures found during clearing activities.
8.3	The Proponent shall monitor mortality of Little Brown Myotis (<i>Myotis lucifugus</i>) and Northern Myotis (<i>Myotis septentrionalis</i>) and their usage at buffer-zones and of roosting structures, to determine the effectiveness of the mitigation measures during construction and operation.	September 2015	July 2035	No mortalities observed.

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8.4	The Proponent shall construct wildlife tunnels and fencing along the access road to allow passage of the Western Toad (<i>Anaxyrus boreas</i>) beneath the road as close as possible to existing migration corridors taking into account British Columbia's Guidelines for Amphibian and Reptile Conservation during Urban and Rural Land Development in British Columbia.	July 2016	September 2017	One tunnel was installed in 2016, fencing and a second tunnel with fencing is planned for 2017. These are in high priority potential migration locations proposed by the wildlife baseline survey.
9	Accidents or malfunctions			
9.1	The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects and shall implement emergency response procedures and contingencies developed in relation to the Designated Project.	August 2015	July 2040	
9.2	The Proponent shall, prior to construction, consult with Aboriginal groups to identify potential accidents and malfunctions that may result in an adverse environmental effect, and on the measures to be applied to prevent such accidents and malfunctions.	August 2015	August 2015	
9.3	In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall:			
	9.3.1 Notify relevant federal and provincial authorities, including notifying the Agency in writing of the accident or malfunction as soon as possible in the circumstances;	August 2015	July 2040	Activity to be completed on an as-needed basis.
	9.3.2 Implement immediate measures to minimize any adverse environmental effects associated with the accident or malfunction;	August 2015	July 2040	Activity to be completed on an as-needed basis.
	9.3.3 Submit a written report to the Agency as soon as possible in the circumstances, but no later than 30 days after the day on which the accident or malfunction took place. The written report shall include:	August 2015	July 2040	Activity to be completed on an as-needed basis.
	9.3.3.1 A description of the accident or malfunction and of its adverse environmental effects;	August 2015	July 2040	Activity to be completed on an as-needed basis.
	9.3.3.2 The measures that were taken by the Proponent to mitigate the environmental effects of the accident or malfunction;	August 2015	July 2040	Activity to be completed on an as-needed basis.
	9.3.3.3 A description of any residual environmental effects, and any additional measures required to address residual environmental effects; and	August 2015	July 2040	Activity to be completed on an as-needed basis.
	9.3.3.4 If an emergency response plan was implemented, details concerning its implementation.	August 2015	July 2040	Activity to be completed on an as-needed basis.
	9.3.4 As soon as possible in the circumstances, but no later than 90 days after the day on which the accident or malfunction took place, submit a written report to the Agency on the changes made to avoid a subsequent occurrence of the accident or malfunction and on the implementation of any additional measures to mitigate residual environmental effects.	August 2015	July 2040	Activity to be completed on an as-needed basis.
9.4	The Proponent shall develop and implement a communication plan, in consultation with Aboriginal groups, that shall include:	August 2015	December 2015	
	9.4.1 The types of accidents or malfunctions requiring a notification by the Proponent to the respective Aboriginal groups;	August 2015	December 2015	
	9.4.2 The manner by which Aboriginal groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Aboriginal groups to assist in the response to the accident or malfunction; and	August 2015	December 2015	

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9.4.3	The contact information of the representatives of the Proponent that the Aboriginal groups may contact and of the respective Aboriginal groups to which the Proponent provides notification.	August 2015	December 2015	
10	Implementation Schedule			
10.1	The Proponent shall submit an implementation schedule for conditions contained in this Decision Statement to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, at least 30 days prior to construction. The implementation schedule shall indicate the commencement and completion dates for each activity relating to conditions set out in this Decision Statement.	August 2015	August 2015	
10.2	The Proponent shall submit an update to this implementation schedule in writing to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, every two years on or before March 31, until completion of the activities.	March 31, 2017	March 31, 2039	
10.3	The Proponent shall provide the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, with a revised implementation schedule if any change occurs from the initial schedule or any subsequent updates. The Proponent shall provide the revised implementation schedule at least 30 days prior to the implementation of the change.	August 2015	July 2040	Activity to be completed on an as-needed basis.
11	Record keeping			
11.1	The Proponent shall maintain a written record, or a record in an electronic format compatible with that used by the Agency, and retain and make available that record to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, at a facility close to the Designated Project (local facility). The record shall include information related to the implementation of the conditions set out in this Decision Statement, and the results of all associated monitoring, including:	September 2015	July 2037	
11.1.1	The place, date and time of any sampling, as well as techniques, methods or procedures used;	September 2015	July 2037	
11.1.2	The dates and the analyses that were performed;	September 2015	July 2037	
11.1.3	The analytical techniques, methods or procedures used in the analyses;	September 2015	July 2037	
11.1.4	The names of the persons who collected and analyzed each sample and documentation of any professional certifications relevant to the work performed that they might possess; and	September 2015	July 2037	
11.1.5	the results of the analyses.	September 2015	July 2037	
11.2	The Proponent shall retain and make available upon demand to the Agency, or anyone designated pursuant to section 89 of the Canadian Environmental Assessment Act, 2012, the information contained in condition 11.1 at a facility close to the Designated Project (or at a location within Canada and agreed upon by the Agency, should the local facility no longer be maintained). The information shall be retained and made available throughout construction and operation, and for twenty-five years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first.	September 2015	July 2037	