

3. Information Distribution and Consultation

3.1 INTRODUCTION

Pretium Resources Inc. (Pretivm) initiated consultations with Aboriginal and non-Aboriginal communities in February 2011, prior to formally entering the environmental assessment (EA) process in February 2013. This chapter describes the information distribution and consultation (engagement) activities that Pretivm has undertaken during the EA process to date (until May 16, 2014) with Aboriginal groups (Section 3.5); government agencies (Section 3.6); and the public, local governments, and licence and tenure holders (Section 3.7). The chapter also outlines Pretivm's plan for continuing engagement with these groups during the review of the Application for an Environmental Assessment Certificate/Environmental Impact Statement (Application/EIS). [Appendices 3-A to 3-N](#) provide additional context about the consultation program including examples of information distribution materials, consultation summary tables, issues tracking tables, and copies of the consultation plans and consultation reports.

3.1.1 Information Distribution and Consultation Objectives

Other than complying with provincial and federal requirements related to public and Aboriginal consultation, the objectives of Pretivm's information distribution and consultation activities are as follows:

- consultation will be inclusive, accessible, and timely;
- Brucejack Gold Mine Project (the Project) information will be readily accessible and accurate;
- Project information will be distributed in a timely manner;
- Aboriginal, public, and government input will be considered and incorporated as feasible into the Application/EIS and Project design, and during the Construction, Operation, Closure, and Post-closure phases of the Project;
- sufficient time will be provided to Aboriginal groups to review Project documents;
- consultation approaches will be informed by the issues raised by Aboriginal groups and the public; and
- long-term relationships will be fostered with Aboriginal groups and a positive community presence will be established.

3.2 CONSULTATION REQUIREMENTS

3.2.1 Provincial Requirements

Public consultation requirements for the British Columbia (BC) EA process are set out in the British Columbia *Environmental Assessment Act* (2002) Public Consultation Policy Regulation (BC Reg. 373/2002). The Regulation includes provisions for giving public notice, providing public access to information, establishing formal public comment periods, and engaging the public. These requirements are reflected in the Section 11 Order issued for the Project by the British Columbia Environmental Assessment Office (BC EAO) on July 4, 2013. The Section 11 Order sets out the proponent's obligations pertaining to public consultation, as follows:

- develop a Public Consultation Plan describing how the proponent intends to consult the public in the vicinity of the Project (Section 18.1¹);
- advise the BC EAO as soon as possible if the proponent is unable to implement the public consultation activities outlined in the Public Consultation Plan (Section 18.2);
- respond to issues identified in public comments submitted to the BC EAO during the public comment period that are within the scope of the assessment, and within the timeframe outlined by the BC EAO (Section 18.4);
- in the Application, report on public consultation including the issues raised by the public and issues that were resolved, including a proposal for resolving outstanding issues (Section 18.5.1); and propose a public consultation program for the review of the Application that is consistent with the Public Consultation Plan (Section 18.5.2); and
- report on public consultation at times other than the submission of the Application/EIS (Section 20).

In addition, the Section 11 Order specifies consultation requirements related to Skii km Lax Ha, Tahltan Nation, Nisga'a Nation, government agencies, and the public during the Pre-Application stage and Application review stages. The Section 11 Order sets out the proponent's obligations pertaining to Aboriginal consultation, as follows:

- provide an Aboriginal Consultation Plan to the BC EAO that Aboriginal groups and Nisga'a Nation have had the opportunity to comment on (Sections 14.1 and 16.1);
- provide copies of the Application to Aboriginal groups and Nisga'a Nation for information and consultation purposes (Sections 14.2 and 16.2);
- identify the potential adverse impacts of the proposed Project on Aboriginal interests, and any avoidance, mitigation, or other measures taken to address the impacts, as appropriate, including any changes to the proposed Project design or any other mitigation measures (Sections 14.3);
- provide a written report on any agreements reached with Nisga'a Nation or Nisga'a Village Governments within the meaning of paragraphs 8(i) and 10 of Chapter of the *Nisga'a Final Agreement* (NFA; Section 16.4; NLG, Province of BC, and Government of Canada 1998);
- consult with Nisga'a Nation in accordance with the Aboriginal Consultation Plan, advise the BC EAO as early as possible if circumstances arise that prevent the proponent from implementing consultation activities with Nisga'a Nation as laid out in the plan (Section 16.5 and 16.6), and comply with any additional procedural direction from the BC EAO with respect to consultation with Nisga'a Nation to enable the province to comply with applicable provisions of the NFA (Section 16.6);
- respond to comments received from Aboriginal groups and Nisga'a Nation within time limits set by the BC EAO (Sections 14.4 and 16.3);
- implement additional measures for consultation and accommodation of Aboriginal groups as appropriate and where required by the BC EAO (Section 14.5); and
- report on Aboriginal consultation (Section 17).

¹ The Section references given in brackets at the end of each bulleted line refer to the corresponding sections in the Section 11 Order.

Pretivm used the BC EAO (2013) guidance document *Guide to Involving Proponents when Consulting First Nations in the Environmental Assessment Process* to inform the preparation and completion of the Application.

3.2.2 Federal Requirements

The *Canadian Environmental Assessment Act, 2012* (2012) promotes communication and cooperation with Aboriginal peoples with respect to environmental assessments (sec. 4[d]) and ensures that opportunities are provided for meaningful public participation during an environmental assessment (Section 4[e] and Section 24). Under the Act, the Canadian Environmental Assessment Agency (CEA Agency) is required to post notice of the commencement of the environmental assessment (Section 17), any order made on its internet site (Section 14[6]), and any public notice to request participation of the public (Section 79 [2][a]). Support for the participation of Aboriginal groups and the public is provided under the Participant Funding Program (Section 58).

3.2.3 Application Information Requirements

The EA Working Group² had the opportunity to review early versions of the draft Application Information Requirements (AIR). Comments received by EA Working Group members are summarized in Sections 3.5.2.4 (comments by Aboriginal groups) 3.6.1.1 (comments by government agencies). Pretivm revised the draft AIR based on the comments received and provided formal responses to comments on the draft AIR in tracking tables.³

The BC EAO held a 30-day public comment period on the draft AIR between November 13 and December 13, 2013. Hard copies of the draft AIR were available in the following locations for the duration of the comment period:

- Hazelton Public Library (4255 Government Street, Hazelton);
- Gitlaxt'aamiks Village Government (222 - 5th Avenue Main St., Gitlaxt'aamiks/New Aiyansh);
- Dease Lake Learning Centre/Northern Lights College Library (10 Commercial Dr., Dease Lake);
- Stewart Public Library (824 A Main Street, Stewart);
- Smithers Public Library (3817 Alfred Avenue, Smithers); and
- Terrace Public Library (4610 Park Avenue, Terrace).

Section 3.7.1.3 summarizes comments received during the public comment period and discusses the five open houses the BC EAO held in northwest BC during the public comment period, as well as the comments raised during those meetings. The BC EAO issued the final AIR on May 2, 2014 (BC EAO 2014).

² The EA Working Group is a forum for discussion and resolution of technical issues associated with the proposed Project, as well as providing technical advice to the BC EAO and CEA Agency, who remain ultimately responsible for determining significance. It comprises representatives of provincial, federal, and local governments, and Aboriginal groups.

³ A tracking table detailing Working Group comments on the AIR and Pretivm's responses is available here:

http://a100.gov.bc.ca/appsdata/epic/documents/p395/1399065828108_3cc3d114187fc752cce09ecb641be811f7f401f8a28a9c7bbf82b8f61c43ef1f.pdf

A tracking table detailing comments made by members of the public and Pretivm's responses is available here:

http://a100.gov.bc.ca/appsdata/epic/documents/p395/1399069739877_3cc3d114187fc752cce09ecb641be811f7f401f8a28a9c7bbf82b8f61c43ef1f.pdf

3.2.3.1 Notification of November 2013 Open Houses and Draft Application Information Requirements Public Comment Period

The BC EAO placed a notice on its website, the electronic Project Information Centre (e-PIC), on November 5, 2013 to invite the public to attend the open houses and to comment on the draft AIR. The notice identified the dates, locations, and times of the open houses and the date of the draft AIR public comment period. The notice also identified where copies of the draft AIR were available for viewing and how to submit comments.

Pretivm placed notices ([Appendix 3-A](#), Notice of Open Houses and Invitation to Comment) advertising the dates of the open houses, and the locations and timing of the public comment period in the following newspapers for a three-week period:

- Northern Connector (weeks of Nov. 8, Nov. 15, Nov. 22);
- Interior News (weeks of Nov. 6, Nov. 13, Nov. 20); and
- Terrace Standard (weeks of Nov. 6, Nov. 13, Nov. 20).

The timeframes for placing the advertisements relating to the open houses and draft AIR met the requirements of Section 21 of the Section 11 Order. This section requires that public notice be given at least seven days before the start of a formal public comment period, or the date on which an open house or public meeting is scheduled.

3.2.4 Project Description and Environmental Impact Statement Guidelines

The CEA Agency posted the Project Description on February 8, 2013 for a 21-day public comment period and draft EIS Guidelines on March 26, 2013 for a 30-day public comment period. The CEA Agency issued final EIS Guidelines on May 24, 2013 (CEA Agency 2013). The EIS Guidelines require the Proponent to incorporate community knowledge and Aboriginal traditional knowledge (TK) to which it has access to via engagement activities.

The EIS Guidelines (Section 2.2) reiterate that one of the purposes of the *Canadian Environmental Assessment Act, 2012* (2012) is to ensure that the CEA Agency provides “the public with an opportunity to participate in the EA and opportunity to comment on the draft EA report.” Further, the EIS Guidelines state that “the proponent is required to provide current information about the project to the public and especially to the communities likely to be most affected by the project” (CEA Agency 2013). The EIS Guidelines also contain provisions for Aboriginal consultation (Section 2.3), including communication and cooperation with First Nations and Métis. In addition to engaging with Aboriginal people and groups that may be affected by a project, or that have established or potential Aboriginal and Treaty right and interests in the Project area, Pretivm is directed to integrate Aboriginal TK into the Application/EIS where possible. The Guidelines direct Pretivm to consult with Nisga’a Lisims Government (NLG), Tahltan Central Council (TCC) and Skii km Lax Ha, including holding meetings with these groups and making plain language summaries of key summary documents available to them. Additionally, the EIS Guidelines direct Pretivm to make key summary documents available to Métis Nation BC (MNBC) and to ensure this group’s views are heard and recorded. The term “Aboriginal” is used throughout the chapter to be inclusive of First Nations, including any huwilp and Treaty Nations, and Métis.

3.3 BRUCEJACK GOLD MINE PROJECT TECHNICAL WORKING GROUP

The BC EAO/CEA Agency established the Brucejack Gold Mine Project Working Group in May 2013 and invited representatives of local⁴, provincial, and federal government agencies, as well as

⁴ Consultations with local government beyond the EA Working Group are reported in Section 3.7.

representatives of Skii km Lax Ha, Tahltan Nation and THREAT (Tahltan Heritage Resource Environmental Assessment Team), and NLG to participate in the Working Group. To date, there have been two Working Group meetings, held on September 4, 2013 and May 8, 2014 (Table 3.3-1). Pretivm attended the September 4, 2013 meeting to provide information on the Project, describe the results of environmental baseline studies and the potential effects of the Project, and to present and seek comments on the draft AIR. Pretivm attended the May 8, 2014 meeting to present an update on the Project and to present initial results of the assessment of water quality, as well as to provide information on hydrogeology, hydrogeology, and water quality modelling.

3.4 PROJECT MATERIALS AND INFORMATION DISSEMINATION

Pretivm has developed and distributed informational materials to help increase public awareness and understanding of the Project. These materials are summarized as follows, with copies provided in appendices as indicated:

- **Pretivm corporate website** (<http://www.pretivm.com>):
 - corporate information including sustainability policies, photo gallery, and a news page;
 - Project-related information - Brucejack Gold Mine Project Page (<http://www.pretivm.com/projects/brucejack/overview/default.aspx>):
 - Overview;
 - Reserves and Resources;
 - Claim Boundary Map;
 - Drilling;
 - Brucejack Geology - Summary;
 - Technical Reports;
- **Project information booklet (Appendix 3-B);**
- **Project posters/storyboards (Appendix 3-C):**
 1. Pretium Resources Inc. (Pretivm);
 2. Project Overview (1);
 3. Project Overview (2);
 4. Project Components and Environmental Design;
 5. Mine Lifecycle and Employment;
 6. Environmental Study Program (1);
 7. Environmental Study Program (2);
 8. Human Environment Study Program;
 9. Public Participation and Aboriginal Consultation;
- **Project maps displayed at Open Houses (Appendix 3-C);**
- **Project video;** and
- **Pretivm PowerPoint presentations.**

Table 3.3-1. Summary of Working Group Meeting Dates, Locations, Topics, and Participants

Meeting Date	Topics	Location	Skii km Lax Ha	Tahltan Nation	Nisga'a Nation	Government Agencies	Local Government
September 4, 2013	<ul style="list-style-type: none"> provincial and federal EA process EA Working Group terms of reference Valued Component guidelines Project overview 	Smithers, BC	Skii km Lax Ha	TCC	NLG	BC EAO Canadian Wildlife Service CEA Agency Health Canada BC Ministry of Energy and Mines (BC MEM) BC Ministry of Environment (BC MOE) BC Ministry of Forests, Lands and Natural Resource Operations (BC MFLNRO) BC Ministry of Transportation and Infrastructure (BC MOTI)	Regional District of Kitimat-Stikine (RDKS)
May 8, 2014 (not full WG meeting, water interest sub-group)	<ul style="list-style-type: none"> Update and review of Project Description Hydrogeology Hydrology Geochemistry Water quality-hydrodynamic modelling Water quality-GoldSim™ modelling Water quality-preliminary EA 	Vancouver, BC		TCC		BC EAO BC MEM BC MFLNRO BC MOE CEA Agency Transport Canada US Environmental Protection Agency	

3.5 ABORIGINAL INFORMATION DISTRIBUTION AND CONSULTATION

Portions of the Project lie within the traditional territories of Skii km Lax Ha and Tahltan Nation, and the Nass Area as defined in the NFA (Figures 3.5-1 to 3.5-3.). The Section 11 Order confirms the Aboriginal groups that must be consulted with respect to the potential effects of the Project. These groups include Skii km Lax Ha and Tahltan Nation, as represented by the TCC, and Nisga'a Nation, represented by NLG. The Section 11 Order identifies the BC EAO as being responsible for consulting with Gitanyow Wilp Wii'litsxw so that the wilp is informed of the progress of the EA and has the opportunity to raise issues pertaining to the EA process to the BC EAO.

This section identifies Pretivm's Aboriginal engagement activities undertaken to date (May 16, 2014) and includes a plan for consultations with Aboriginal groups during the Application/EIS review stage. Tables summarizing communications with Skii km Lax Ha (Table 3-D1), Tahltan Nation (Table 3-D2), Nisga'a Nation (Table 3-D3), and Métis and other Aboriginal groups (Table 3-D4) are provided in [Appendix 3-D](#), Summary of Communications with Aboriginal Groups. Tables summarizing Project-related issues raised by Aboriginal groups since the EA process was initiated and Pretivm's responses to these issues are provided in [Appendix 3-E](#) (Aboriginal Issues Tracking Tables; Table 3-E1 for Skii km Lax Ha, Table 3-E2 for Tahltan Nation, Table 3-E3 for Nisga'a Nation, and Table 3-E4 for Métis and Other Aboriginal Groups). A discussion of the anticipated adverse effects on Aboriginal interests and rights, and Nisga'a interests and treaty rights, as well as associated measures to avoid, mitigate, or manage the effects is included in Chapter 26, Assessment of Asserted or Established Aboriginal Rights and Interests, and Chapter 27, Assessment of Nisga'a Nation Treaty Rights, Interests, and Information Requirements. Chapter 26 also discusses the desk-based report ([Appendix 25-C](#), Métis Interests Desktop Study) prepared to assist the CEA Agency with the identification of Métis interests in the area of the Project. This section concludes with a proposed plan for consulting Aboriginal groups and Nisga'a Nation during the Application/EIS review (Section 3.5.5).

3.5.1 Nisga'a Final Agreement

The mine site, including underground development, operations camp, and mill, will be located just outside of the western edge of the Nass Area, adjacent to Brucejack Lake (Figure 3.5-3). While the Project itself is not located on Nisga'a Lands, in the Nass Wildlife Area, or in the Nass Area, most of the Brucejack Access Road, transmission line, aerodrome, and transfer station will be located in the Nass Area. The Brucejack Access Road, which connects the Project with Highway 37 about 30 km south of Bell II, runs east-west through the western portion of the Nass Area, as defined by the NFA. The Brucejack Access Road will be used to transport personnel, equipment, and concentrate. The transmission line from the Project to the Long Lake Hydroelectric Project, which was recently commissioned near Stewart, passes north-south through the Nass Area.

Accordingly, BC and Canada, in undertaking the EA of the Project, are required to comply with Chapter 10 of the NFA. Provisions of Chapter 10 applicable to the conduct of the EA are:

6. *If a proposed project that will be located off Nisga'a Lands may reasonably be expected to have adverse environmental effects on residents of Nisga'a Lands, Nisga'a Lands or Nisga'a interests set out in this Agreement, Canada or British Columbia, or both, as the case may be, will ensure that the Nisga'a Nation:*
 - a. *receives timely notice of, and relevant available information on, the project and the potential adverse environmental effects;*
 - b. *is consulted regarding the environmental effects of the project; and*

- c. *receives an opportunity to participate in any environmental assessment under federal or provincial laws related to those effects, in accordance with those laws, if there may be significant adverse environmental effects.*
8. *All environmental assessment processes referred to in this Agreement will, in addition to the requirements of applicable environmental assessment legislation:*
- e. *assess whether the project can reasonably be expected to have adverse environmental effects on residents of Nisga'a Lands, Nisga'a Lands, or Nisga'a interests set out in this Agreement and, where appropriate, make recommendations to prevent or mitigate those effects;*
 - f. *assess the effects of the project on the existing and future economic, social and cultural well-being of Nisga'a citizens who may be affected by the project;*
 - i. *take into account any agreements between the project proponent and the Nisga'a Nation or a Nisga'a Village concerning the effects of the project.*
10. *In exercising decision-making authority for projects that may have adverse environmental effects on residents of Nisga'a Lands, Nisga'a Lands or Nisga'a interests set out in this Agreement, the decision maker will take into account, but will not be bound by, any agreement between the Nisga'a Nation or a Nisga'a Village and the project proponent concerning the project (NLG, Province of BC, and Government of Canada 1998).*

3.5.2 Pre-Application/Pre-EIS Consultation with Aboriginal Groups

Pretivm's communications and consultations with Skii km Lax Ha, Tahltan Nation, and Nisga'a Nation between November 1, 2011 and May 16, 2014 are summarized below. Detailed summaries of communications with these groups are included in [Appendix 3-D](#), Summary of Communications with Aboriginal Groups.⁵ [Appendix 3-D](#) also includes a summary of Pretivm's communications with Aboriginal groups not listed in the Section 11 Order, but who are in the vicinity of the Project, or may have an interest in the Project. These groups include the MNBC, Gitxsan Nation, and Gitanyow Nation.

3.5.2.1 Aboriginal Consultation Plan

Pretivm authored an Aboriginal Consultation Plan as directed by Sections 14.1 and 16.1 of the Section 11 Order and informed by Sections 14, 16, and 17 of the Order ([Appendix 3-K](#), Aboriginal Consultation Plan). The Plan outlines Pretivm's approach to Aboriginal engagement in the pre-Application stage, including seeking information on potentially affected Aboriginal and Nisga'a interests and Nisga'a rights as defined by the NFA, issues tracking, and reporting. The Aboriginal Consultation Plan also includes a plan for Aboriginal engagement during the Application review stage, reiterated in Section 3.3.3. A draft of the Plan was provided to Skii km Lax Ha, TCC, and THREAT, and NLG for comment. Comments were provided by Skii km Lax Ha, and resulted in some changes to the wording in the Plan. NLG reviewed the plan and did not request any revisions. TCC and THREAT did not provide review and comment. Pretivm submitted the final plan to the BC EAO on September 3, 2013.

⁵ The consultation summary tables in [Appendix 3-D](#) document Pretivm's attempts to share Project information with Aboriginal groups and Nisga'a Nation, as well as attempts to acquire information about how Aboriginal interests, and Nisga'a Nation rights and interests under the NFA, could potentially be affected by the Project. When Pretivm did not receive a response from Aboriginal groups or Nisga'a Nation following initial communication, Pretivm followed up with additional communications. All Pretivm-initiated communications are recorded in [Appendix 3-D](#).

Figure 3.5-1
Skii km Lax Ha Traditional Territory

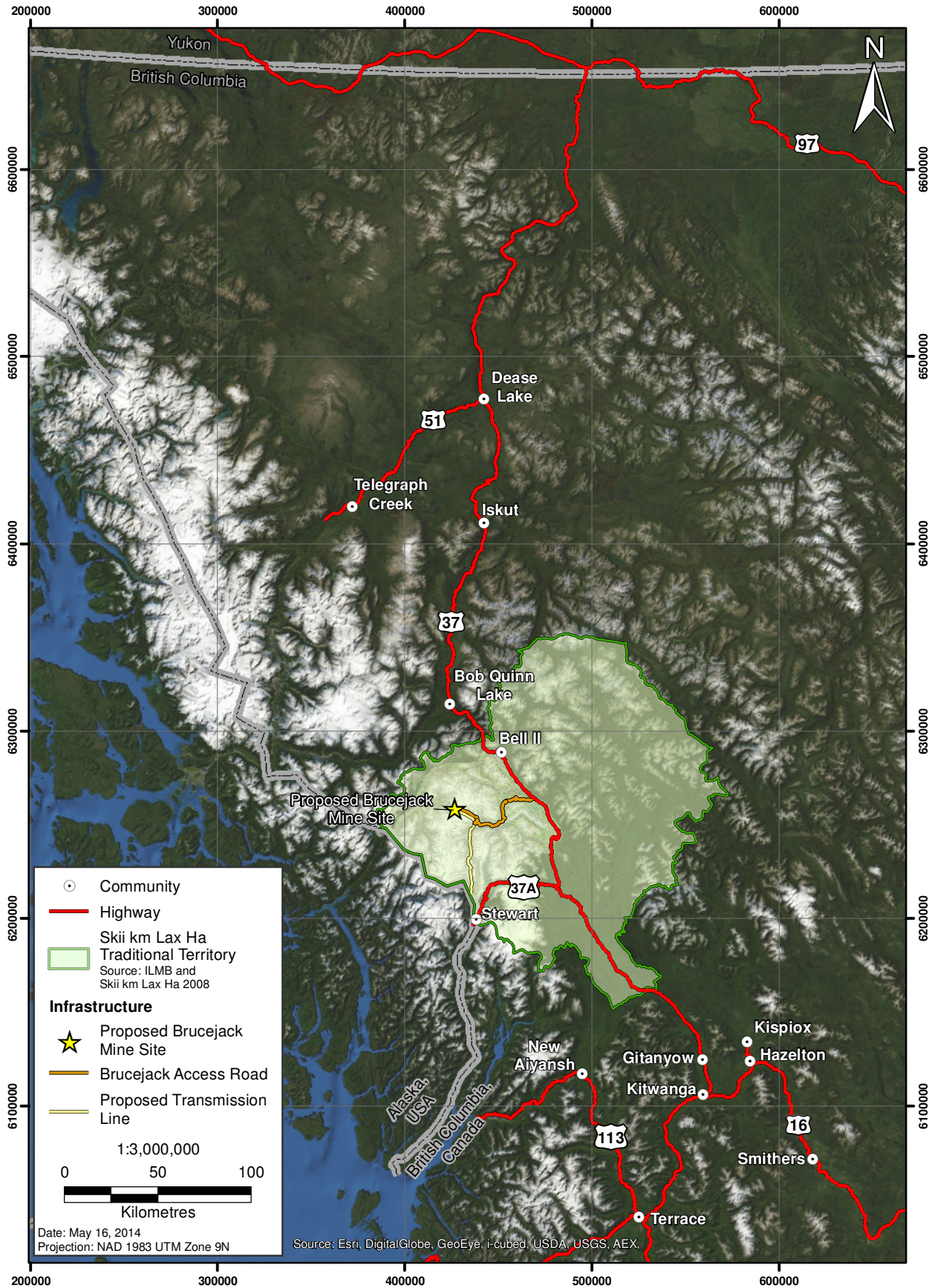


Figure 3.5-2
Tahltan Nation Traditional Territory

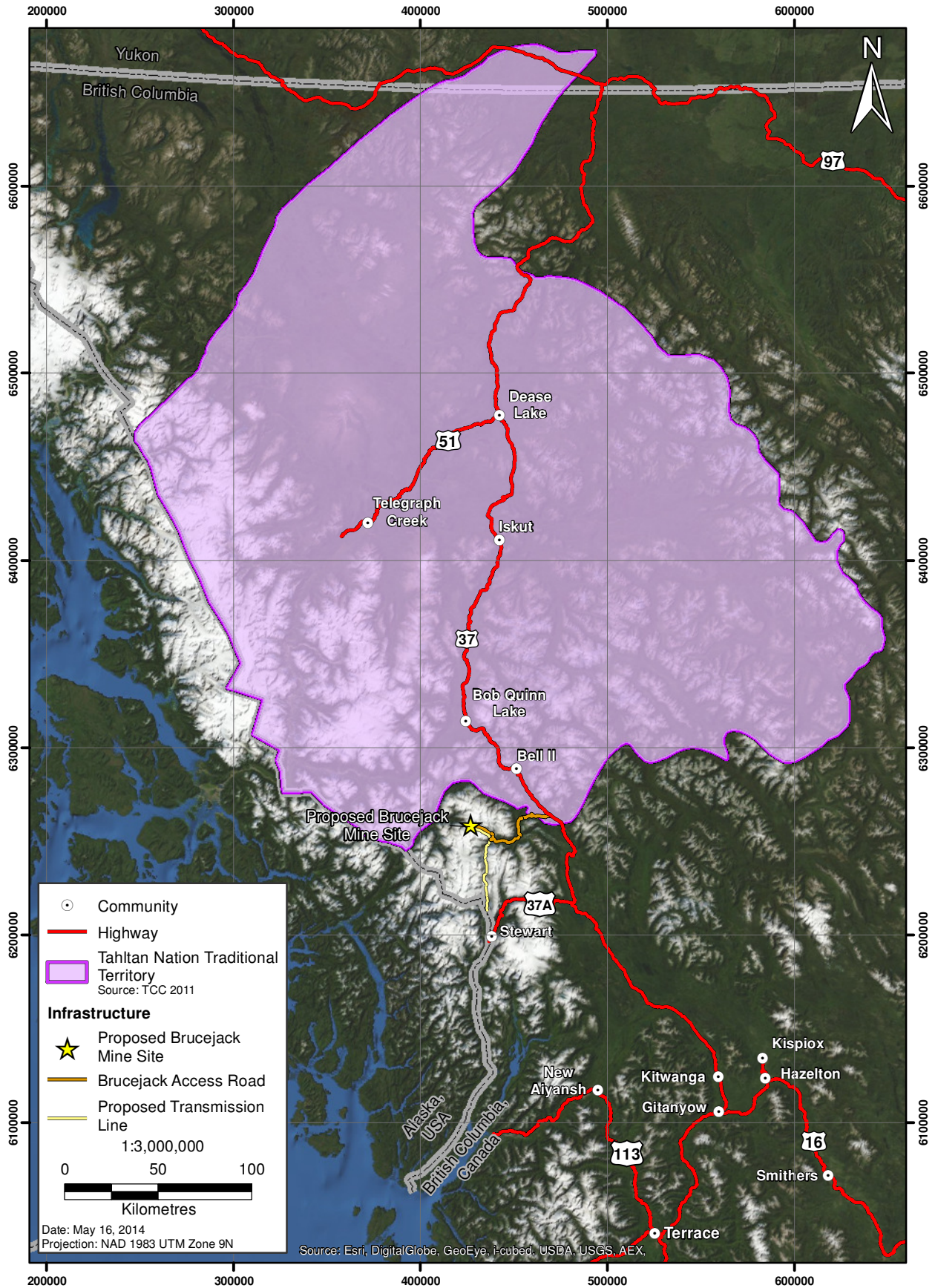
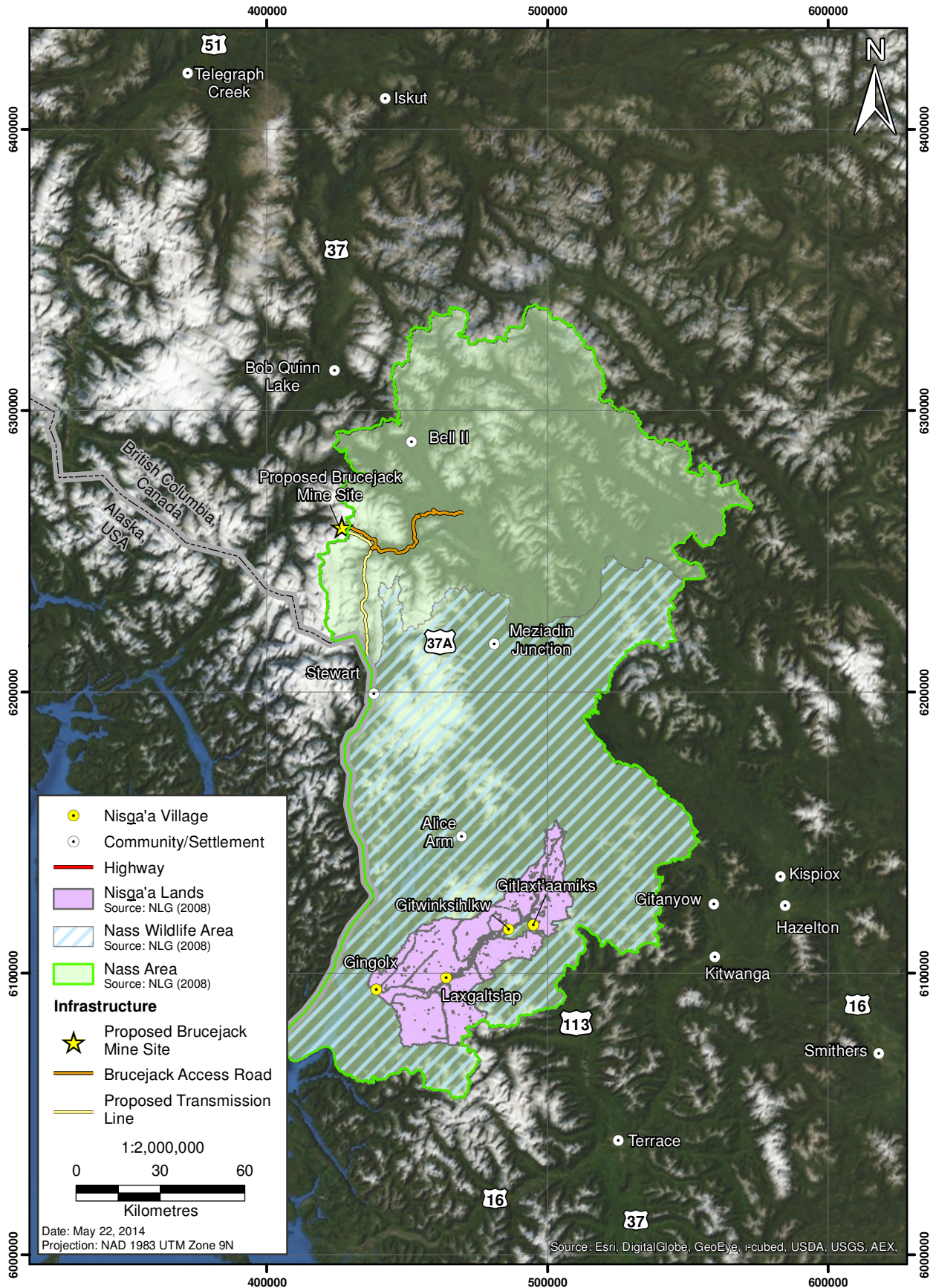


Figure 3.5-3
Nisga'a Lands, the Nass Wildlife Area, and the Nass Area



In accordance with the requirements of Sections 14 and 17 of the Section 11 Order, the Aboriginal Consultation Plan outlined the following engagement activities during the pre-Application/pre-EIS stage:

- provide a draft of the Aboriginal Consultation Plan to Skii km Lax Ha and Tahltan Nation for review and discussion, and incorporate feedback received from these groups into the final Aboriginal Consultation Plan to be distributed to Skii km Lax Ha, Tahltan Nation, and BC EAO and CEA Agency (Section 3.5.1);
- consider and provide written responses to comments received from Aboriginal groups within the timeframe specified by the BC EAO, including comments on the draft AIR and Application/EIS screening responses (Section 3.5.4);
- incorporate input and comments received from Aboriginal groups into the draft AIR (Section 3.5.4);
- by mutual agreement, hold discussions with Aboriginal groups to discuss potential effects of the proposed Project on Aboriginal interests and proposals to avoid, mitigate, or otherwise address the effects as appropriate (Section 3.5.3 and [Appendix 3-D](#), Summary of Communications with Aboriginal Groups);
- conduct, review, and/or support TK/TU studies, as appropriate for each Aboriginal group (Section 3.5.2.6);
- within the time limits set by the BC EAO, notify Aboriginal groups about the public comment period (Section 3.5.2.4);
- identify, compile, track, and, where possible, address issues raised by Aboriginal groups during engagement activities (Section 3.5.3 and [Appendix 3-E](#), Aboriginal Issues Tracking Tables);
- develop a process for the resolution of outstanding issues (Section 3.5.3.1);
- within time limits set by the BC EAO (Section 17.3 of the Section 11 Order), prepare Aboriginal Consultation Reports that summarize engagement to date with Aboriginal groups, including feedback and information received from Aboriginal groups; identification of potential adverse impacts of the proposed Project on Aboriginal interests and proposals to avoid, mitigate, or otherwise address the impacts as appropriate; and discussion of next steps/future engagement activities if different from those outlined in the Plan (Section 3.5.2.10);
- provide a draft of all Aboriginal Consultation Reports to Skii km Lax Ha and Tahltan Nation for review and discussion, and incorporate feedback received from these groups into all final Aboriginal Consultation Reports to be distributed to Skii km Lax Ha, Tahltan Nation, and BC EAO and CEA Agency (Section 3.5.2.10);
- consider other means of engagement brought forward by Aboriginal groups, if applicable; and
- undertake further engagement with Aboriginal groups as directed by the BC EAO.

In accordance with Sections 16 and 17 of the Section 11 Order, the Aboriginal Consultation Plan outlined the following engagement activities during the pre-Application/pre-EIS stage for Nisga'a:

- provide a draft of the Plan to NLG for review and discussion, and incorporate feedback received from NLG into the final Aboriginal Consultation Plan to be distributed to NLG, BC EAO, and CEA Agency (Section 3.5.2.1);
- consider and provide written responses to comments received from NLG within the timeframe specified by the BC EAO, including comments on the draft AIR and Application/EIS screening responses (Section 3.5.2.4);
- incorporate input and comments received from NLG into the draft AIR (Section 3.5.2.4);

- prepare an Economic, Social, and Cultural Impact Assessment (ESCIA) based on NLG Guidelines issued to the BC EAO and CEA Agency in November 2010 (Section 3.5.2.7);
- by mutual agreement, hold discussions with NLG to discuss potential adverse impacts of the proposed Project on the rights and interests of Nisga'a Nation under the NFA and proposals to avoid, mitigate, or otherwise address these as appropriate (Section 3.5.3 and [Appendix 3-D](#), Summary of Communications with Aboriginal Groups);
- in discussion with NLG and the BC EAO, host a community meeting in at least one of the Nisga'a villages (Section 3.5.2.4);
- within the time limits set by the BC EAO, notify Nisga'a Nation about the public comment period (Section 3.5.2.4);
- identify, compile, track, and, where possible, address issues raised by Nisga'a Nation during engagement activities (Section 3.5.3 and [Appendix 3-E](#), Aboriginal Issues Tracking Tables);
- develop a process for the resolution of outstanding issues (Section 3.5.3.1);
- within time limits set by the BC EAO (Section 17.3 of the Section 11 Order) prepare Aboriginal Consultation Reports that summarize engagement to date with Nisga'a Nation, including feedback and information received from Nisga'a Nation; identification of potential adverse impacts of the proposed Project on the rights and interests of Nisga'a Nation under the NFA and proposals to avoid, mitigate, or otherwise address the impacts as appropriate; and discussion of next steps/future engagement activities if different from those outlined in the Aboriginal Consultation Plan (Section 3.5.2.10);
- provide a draft of all Aboriginal Consultation Reports to NLG for review and discussion, and incorporate feedback received from NLG into all final Aboriginal Consultation Reports to be distributed to NLG, the BC EAO, and the CEA Agency (Section 3.5.2.10);
- within time limits set by the BC EAO, provide a summary report of any potential agreements reached with Nisga'a Nation or a Nisga'a village within the meaning of paragraphs 8(i) and 10 of Chapter 10 of the NFA;
- consider other means of engagement brought forward by NLG, if applicable; and
- undertake further engagement with Nisga'a Nation as directed by the BC EAO.

3.5.2.2 *Notification of the Brucejack Gold Mine Project*

Pretivm met with Skii km Lax Ha, Tahltan Nation, and Nisga'a Nation in November 2011 to provide an introduction to the Project and meet with the leadership of each group.⁶ These meetings occurred prior to Pretivm formally entering the provincial and federal EA processes. The BC EA process was initiated on February 6, 2013 when the BC EAO issued the Section 10 Order under the BC *Environmental Assessment Act* (2002) The federal EA process was initiated when the CEA Agency issued a public notice on March 25, 2013 indicating an EA is required for the Project.

3.5.2.3 *Brucejack Gold Mine Project Environmental Assessment Working Group*

The BC EAO/CEA Agency established the Brucejack Gold Mine Project Working Group in May 2013 and invited representatives of Skii km Lax Ha, Tahltan Nation and THREAT, and NLG to participate on the

⁶ Pretivm also met with representatives of the Gitanyow Nation and Gitksan Nation in November 2011 to provide an introduction to the Project. Pretivm has met with representatives of these groups several times in 2012, prior to the BC EAO's issuance of the Section 11 Order, which did not include direction for Pretivm to consult with these groups. These meetings are included in Table 3-D4 in [Appendix 3-D](#), Summary of Communications with Aboriginal Groups.

Working Group. Other Working Group members include representatives of federal and provincial government agencies, and local governments. To date, there have been two Working Group meetings, held on September 4, 2013 and May 8, 2014. Pretivm attended the September 4, 2013 meeting to provide information on the Project, describe the results of environmental baseline studies and the potential effects of the Project, and to present and seek comments on the draft Application Information Requirements (AIR). This meeting was attended by Skii km Lax Ha, TCC, and NLG. Agenda items included:

- provincial and federal EA process;
- Working Group terms of reference;
- Valued Component guidelines; and
- Project overview.

On May 8, 2014 a Water and Water Quality Modelling Working Group meeting took place and was attended by TCC. Agenda items included:

- update and review of Project Description;
- hydrogeology;
- hydrology;
- geochemistry;
- water quality - hydrodynamic modelling;
- water quality - GoldSim™ modelling; and
- water quality - preliminary EA.

3.5.2.4 *Application Information Requirements*

The BC EAO provided Skii km Lax Ha, Tahltan Nation, and Nisga'a Nation with opportunities to review and comment on the draft AIR through their involvement in the EA Working Group. The draft AIR identifies the information that must be included in the Application. The BC EAO received written comments on the draft AIR from Aboriginal groups as follows:

- August 27 and 28, 2013: Comments from Skii km Lax Ha;
- August 23, 2013: Comments from NLG; and
- September 6, 2013: Comments from THREAT on behalf of TCC.

Pretivm provided the BC EAO with written responses to Aboriginal comments and the draft AIR was modified to address the comments.⁷

On November 20, 2013, Pretivm emailed representatives of Skii km Lax Ha, TCC and THREAT, NLG and Nisga'a Village Governments (as well as the Gitxsan Chiefs Office, Gitxsan Development Corporation, Gitanyow Hereditary Chiefs Office, and the BC Aboriginal Mine Training Association) inviting them to the

⁷ A tracking table detailing Working Group comments, including comments made by Aboriginal groups, on the AIR and Pretivm's responses is available here:
http://a100.gov.bc.ca/appsdata/epic/documents/p395/1399065828108_3cc3d114187fc752cce09ecb641be811f7f401f8a28a9c7bbf82b8f61c43ef1f.pdf

open houses. Pretivm also placed notifications in local newspapers⁸ commencing on November 6, 2013 and running for three weeks ([Appendix 3-A](#), Notice of Open Houses and Invitation to Comment). For Iskut, Telegraph Creek, and Dease Lake, Pretivm engaged TCC to facilitate the notification of Tahltan residents of the Dease Lake and Iskut open houses via their community liaison (Pretivm provided a community poster for distribution: [Appendix 3-F](#), Notice of Open Houses (Pretivm)). For the open house in Gitlaxt'aamiks/New Aiyansh, Pretivm contacted the Chief Councillors and/or Chief Administrative Officers of the four Nisga'a Village Governments and provided a community poster for distribution to members and posting in the villages ([Appendix 3-F](#), Notice of Open Houses (Pretivm)).

On November 21, 2013 Pretivm also notified, by email, the MNBC, Tri-River Métis Association, and Northwest BC Métis Association of the upcoming series of open houses in northwest BC, and invited representatives and members to attend. Pretivm transmitted the official BC EAO public notice; a digital copy of the draft AIR; and a letter to the presidents of each chartered community, which included a Project update.

3.5.2.5 *Field Assistants and Project Employment*

Pretivm has collaborated extensively with Tsetsaut Ventures (a Skii km Lax Ha owned company) to hire employees of Aboriginal descent for baseline environmental field programs, as well as for work at the Project, including construction of the Brucejack exploration access road and associated environmental monitoring. An average of 35 individuals were employed in 2012, an average of 20 in 2013, and an average of 27 individuals so far in 2014. Pretivm has also contracted road work to Nass Area Enterprises and is in discussions with Tahltan Nation Development Corporation regarding road work.

3.5.2.6 *Traditional Knowledge and Traditional Use Studies*

Aboriginal TK, including efforts to fund or undertake TK/traditional use (TU) studies, as well as the incorporation of TK/TU in the Application/EIS are discussed in Section 26.4 of Chapter 26 of the Application/EIS, Assessment of Effects on Asserted or Established Aboriginal Rights and Interests.

3.5.2.7 *Nisga'a Economic, Social, and Cultural Impact Assessment*

Pursuant to the requirements of Chapter 10, paragraph 8(f) in the NFA, Pretivm has developed a scope of work with input from NLG to complete a Nisga'a ESCIA per NLG Guidelines (released November 2010). Further to a teleconference on October 11, 2013 between NLG, CEA Agency, BC EAO, and Pretivm, field research involving Nisga'a Village Governments was carried out in February 2014. The purpose of the fieldwork was to update existing socio-economic baseline data and gather additional information on key issues of concern to Nisga'a Village Governments and citizens in relation to economic, social, and cultural effects of the Project. Pretivm provide a draft of the ESCIA Report (ERM Rescan 2014b) to NLG for review and comment prior to submission of the Application/EIS (May 16, 2014).

3.5.2.8 *Training*

Pretivm will adopt policies or develop strategies that consider the needs of workers from Aboriginal and regional communities and will be aimed at increasing the level of local employment and participation in the Project. To date, Pretivm has provided on-site training through Tsetsaut Ventures for equipment operators and carpentry and has provided "Foodsafe" training and certification for kitchen staff.

⁸ Ads were placed in Smithers Interior News, Terrace Standard, and Northern Connector.

3.5.2.9 Site Visits and Mine Tours

Pretivm has hosted several Project site tours to date for Aboriginal groups, as per below.

- August 21 and 22, 2012: Skii km Lax Ha:
 - Skii km Lax Ha representatives working in camp participated in each of the site tours listed immediately below (tour of the property and core shack).
- August 21, 2012: Gitanyow Fisheries Authority:
 - helicopter picked up participants in Gitanyow, and flew up Highway 37 and then along the access road to camp. Following lunch, participants toured the property, including the core shack, and visited with Gitanyow employees.
- August 22, 2012: Gitxsan Chiefs Office and Skeena Fisheries Commission (Ministry of Aboriginal Relations and Reconciliation also in attendance):
 - helicopter picked up participants in New Hazelton, and flew up Highway 37 and then along the exploration access road to camp. Participants toured the property, including the core shack.
- June 19, 2013: Nass Area Enterprises:
 - met Nass Area Enterprises representative at Wildfire Camp. Drove up exploration road and then helicoptered into Brucejack Camp. Participants toured underground workings.
- September 5, 2013: EA Working Group (Skii km Lax Ha participated):
 - flew from Smithers to Bob Quinn and then helicoptered into the Project site. Participants toured the property including the core shack.

3.5.2.10 Aboriginal Consultation Reports

In compliance with Section 17 of the Section 11 Order, Pretivm prepared consultation reports consistent with the Aboriginal Consultation Plan. The Aboriginal consultation reports summarize Pretivm's consultation efforts with Aboriginal groups (Skii km Lax Ha and Tahltan Nation) and Nisga'a Nation; identify potential adverse impacts of the proposed Project on Nisga'a rights and interests as defined by the NFA, on Aboriginal rights and interests, and any avoidance, mitigation, or other measures that will be taken to address the potential impacts, as appropriate; and propose next steps and future consultation activities, noting any differences than those outlined in the Aboriginal Consultation Plan.⁹

The *Brucejack Gold Mine Project: Interim Pre-Application Aboriginal Consultation Report* covered the period from November 1, 2011 to November 30, 2013 (ERM Rescan 2014a). Pretivm provided a draft of this interim consultation report to Skii km Lax Ha, TCC and THREAT, and NLG on December 16, 2013 for review and comment. Comments were received from Skii km Lax Ha (January 20, 2014) and NLG (February 11, 2014). Pretivm revised the report based on these comments. On January 16, 2014 THREAT noted that more time was required for their review. Pretivm advised it would consider and incorporate as feasible any TCC or THREAT comments they may receive into the subsequent Pre-Application Aboriginal Consultation Report. A revised version of the report was provided to NLG, TCC, and Skii km Lax Ha on February 14, 2014, and was also submitted to the BC EAO. The BC EAO provided comments on March 11, 2014. Pretivm revised the report based on the BC EAO's comments and submitted the final version to the BC EAO on March 19, 2014 and to Aboriginal groups on April 17, 2014.

⁹ No changes to the Aboriginal Consultation Plan were proposed in the Aboriginal Consultation Reports.

As per the Section 11 Order, Pretivm submitted a draft version of the *Brucejack Gold Mine Project: Pre-Application Aboriginal Consultation Report* (ERM Rescan 2014c), covering the period from November 1, 2011 to March 31, 2014, to Skii km Lax Ha, Tahltan Nation, and Nisga'a Nation on April 17, 2014. Skii km Lax Ha provided comments on May 14, 2014 (on Skii km Lax Ha issues tracking table). Pretivm met with THREAT on May 16, 2014 and discussed the report (no specific comments at this time). Following receipt of, if any, NLG comments on the report, Pretivm will revise the report and submit to the BC EAO ([Appendix 3-L](#), Pre-Application Aboriginal Consultation Report).

3.5.3 Issues Raised by Aboriginal Groups and Responses

[Appendix 3-E](#), Aboriginal Issues Tracking Tables, contains issues tracking tables for each Aboriginal group (Table 3-E1 for Skii km Lax Ha, Table 3-E2 for Tahltan Nation, Table 3-E3 for Nisga'a Nation, and Table 3-E4 for Métis and Aboriginal Groups not listed in the Section 11 Order). These tables list the issues raised by Aboriginal groups until May 16, 2014, and Pretivm's responses, which explain how each issue has been considered and addressed. The responses provided in the tables reference where in the Application/EIS additional information is available. The recorded issues are based on comments provided at meetings with Skii km Lax Ha, Tahltan Nation and Nisga'a Nation, Working Group meetings, and correspondence.¹⁰ Drafts of these tables (covering the period until March 31, 2014) were included in the *Brucejack Gold Mine Project: Pre-Application Aboriginal Consultation Report* (ERM Rescan 2014c), which was provided to Skii km Lax Ha, Tahltan Nation, and Nisga'a Nation for review and comment.

Aboriginal groups raised issues in the following general areas:

- Aboriginal issues (e.g., traditional foods, rights and title);
- consultation and engagement (e.g., protocols and agreements, information sharing);
- cumulative effects (e.g., study design, traffic);
- current use of lands and resources for traditional purposes; indirect economic effects (e.g., addressing economic losses and current use of lands and resources);
- education and training (e.g., opportunities);
- employment and economic opportunities (e.g., workforce participation);
- fish (e.g., salmon);
- human health (e.g., methodology, country foods);
- hydrology (e.g., glacial melt);
- land use (e.g., commercial vs. non-commercial land use assessment);
- mitigation (e.g., significance ratings);
- Nisga'a ESCIA (e.g., methodology);
- Project design (e.g., waste management);
- scope of the assessment (e.g., access roads);
- scope of the Project (e.g., Brucejack Access Road);

¹⁰ Consultations as well as issues raised by Aboriginal groups are tracked using consultation tracking software.

- socio-economic (e.g., data collection);
- tailings management (e.g., methods)
- traditional knowledge and use (e.g., confidentiality);
- traffic (e.g., interactions with wildlife);
- water quality (e.g., water quality program, leaching); and
- wildlife (e.g., moose, Project attracting wildlife).

Chapter 26 of the Application/EIS, Assessment of Effects on Asserted or Established Aboriginal Rights and Interests, discusses the potential Project effects on Aboriginal rights and interests and proposed mitigations. As per paragraph 8(e) of Chapter 10 of the NFA, Chapter 27, Assessment of Nisga'a Nation Treaty Rights, Interests, and Information Requirements, discusses the potential effects and measures to prevent or mitigate environmental adverse effects on residents of Nisga'a Lands, Nisga'a Lands, or Nisga'a interests.

3.5.3.1 *Outstanding Issues*

Pretivm will attempt to resolve outstanding issues in a timely manner by:

- obtaining additional information as necessary (either from the group raising the issue, and/or from experts who can provide technical expertise on the issue where needed);
- proposing a new or revised response to the Aboriginal group who raised the issue that is still outstanding, and checking with the group to determine whether the issue has been sufficiently addressed;
- taking further actions as needed (e.g., meeting with the group if required) to discuss and resolve the issue, if the Aboriginal group does not consider the issue to be adequately addressed; and
- reporting back to the Aboriginal group on the status of the issue.

At the time of writing this chapter, there are no outstanding issues ([Appendix 3-E](#) contains issues tracking tables documenting issues raised by Aboriginal groups to date and Pretivm's responses).

3.5.4 **Proposed Plan for Consultation with Aboriginal Groups during the Application/EIS Review**

Once the Application/EIS is accepted for formal review, the 180-day review will be initiated, which will include a comment period for the EA Working Group as determined by the BC EAO. The BC EAO will also establish a 30-day public comment period. During the Application/EIS review stage, Pretivm will:

- provide copies of the Application/EIS to Skii km Lax Ha and Tahltan Nation for review and comment;
- notify Aboriginal communities about the public comment period, within the time limits set by the BC EAO;
- provide written responses to comments received from Aboriginal groups on the Application/EIS within the timeframe specified by the BC EAO;
- attend EA Working Group meetings organized by the BC EAO and CEA Agency to provide information related to the Application/EIS and to respond to questions on the Application/EIS;

- by mutual agreement, hold discussions with Aboriginal groups to discuss potential effects of the proposed Project on Aboriginal interests and proposals to avoid, mitigate, or otherwise address the effects as appropriate;
- review and consider Aboriginal groups' comments during the Application/EIS review stage;
- compile, track, and, where possible, address issues raised by Aboriginal groups during engagement activities, including attempting to resolve any outstanding issues;
- within time limits set by the BC EAO (Section 17.3 of the Order), prepare an Aboriginal Consultation Report that summarizes engagement to date with Aboriginal groups, including feedback and information received from Aboriginal groups; identify potential adverse impacts of the proposed Project on Aboriginal interests and proposals to avoid, mitigate, or otherwise address the impacts as appropriate; and discuss next steps/future engagement activities if different from those outlined in the Plan;
- provide drafts of the Aboriginal Consultation Reports to Skii km Lax Ha and Tahltan Nation for review and discussion, and incorporate feedback received from the Aboriginal groups into the final Aboriginal Consultation Reports to be distributed to Skii km Lax Ha, Tahltan Nation, BC EAO, and CEA Agency;
- consider other means of engagement brought forward by Aboriginal groups, if applicable; and
- undertake further engagement with Aboriginal groups as directed by the BC EAO.

Information distribution materials will be developed for use (information handouts, posters, etc.) during this stage and are outlined in the Public Consultation Plan submitted to the BC EAO.

3.5.5 Proposed Plan for Consultation with Nisga'a Nation during the Application/EIS Review

Once the Application/EIS is accepted for formal review, the 180-day review will be initiated, which will include a comment period for the EA Working Group as determined by the BC EAO. The BC EAO will also establish a 30-day public comment period. During the Application review stage, Pretium will:

- provide copies of the Application/EIS to NLG for review and comment;
- within the time limits set by the BC EAO, notify Nisga'a communities about the public comment period;
- provide written responses to comments received from NLG on the Application/EIS within the timeframe specified by the BC EAO;
- attend EA Working Group meetings organized by the BC EAO and CEA Agency to provide information related to the Application/EIS and respond to questions on the Application/EIS;
- by mutual agreement, hold discussions with NLG to discuss potential adverse effects of the proposed Project on the rights and interests of Nisga'a Nation under the NFA and proposals to avoid, mitigate, or otherwise address the impacts as appropriate;
- in discussion with NLG and BC EAO, host a community meeting in at least one of the Nisga'a villages;
- review and consider Nisga'a Nation comments during the Application/EIS review stage;
- compile, track, and, where possible, address issues raised by Nisga'a Nation during engagement activities, including attempting to resolve any outstanding issues;

- within time limits set by the BC EAO (Section 17.3 of the Section 11 Order), prepare an Aboriginal Consultation Report that summarizes engagement to date with Nisga'a Nation, including feedback and information received from Nisga'a Nation; identify potential adverse impacts of the proposed Project on the rights and interests of Nisga'a Nation under the NFA and proposals to avoid, mitigate, or otherwise address the impacts as appropriate; and discuss next steps/future engagement activities if different from those outlined in the Plan;
- provide drafts of the Aboriginal Consultation Reports to NLG for review and discussion, and incorporate feedback received from NLG into the final Aboriginal Consultation Reports to be distributed to NLG, the BC EAO, and the CEA Agency;
- within time limits set by the BC EAO, provide a summary report of any potential agreements reached with Nisga'a Nation or a Nisga'a Village within the meaning of paragraphs 8(i) and 10 of Chapter 10 of the NFA;
- consider other means of engagement brought forward by NLG, if applicable; and
- undertake further engagement with Nisga'a Nation as directed by the BC EAO.

Information distribution materials will be developed for use during this stage (information handouts, posters, etc.) and are outlined in the Public Consultation Plan submitted to the BC EAO.

3.6 GOVERNMENT AGENCY INFORMATION DISTRIBUTION AND CONSULTATION

3.6.1 Pre-Application/Pre-EIS Consultation with Government Agencies

Pretivm's communications and consultations with government agencies between November 1, 2011 and May 16, 2014 are summarized below. Detailed summaries of communications with agencies are included in [Appendix 3-G, Summary of Communications with Government Agencies](#).

3.6.1.1 Application Information Requirements

The following agencies provided comments on the AIR:¹¹

- BC EAO;
- CEA Agency;
- Environment Canada;
- BC MFLNRO;
- BC MEM;
- BC MOTI; and
- BC Ministry of Jobs, Tourism and Skills Training.

3.6.1.2 Site Visits and Mine Tours

A variety of government agencies have participated in a total of four site visits to date, as per Table 3.6-1. A site visit typically included a tour of the property, core shack, and underground workings.

¹¹ A tracking table detailing Working Group comments on the AIR and Pretivm's responses is available here: http://a100.gov.bc.ca/appsdata/epic/documents/p395/1399065828108_3cc3d114187fc752cce09ecb641be811f7f401f8a28a9c7bbf82b8f61c43ef1f.pdf.

Table 3.6-1. Government Agency Site Visits

Date	Government Participants
August 22, 2012	Ministry of Aboriginal Relations and Reconciliation (Gitxsan Chiefs Office, Skeena Fisheries Commission, and Skii km Lax Ha also in attendance)
July 15-19, 2013	BC MOE
August 7, 2013	BC MOE
September 5, 2013	CEA Agency, BC EAO, Health Canada, BC MOE, BC MFLNRO, BC MEM (Skii km Lax Ha also in attendance)

3.6.2 Issues Raised by Government Agencies and Responses

Appendix 3-H contains an issues tracking table listing issues raised by government agencies. These tables list the issues raised by government agencies until May 16, 2014, and Pretivm’s responses explaining how each issue has been considered and addressed.¹² The responses provided in the tables reference where in the Application/EIS additional information is available. The recorded issues are based on comments to date provided at meetings with agencies, as well as EA Working Group meetings and correspondence.

Government agencies raised issues in the following general areas:

- Project design (e.g., closure conditions);
- tailings management (e.g., sediment dispersal events);
- hydrogeology (e.g., modelling);
- hydrology (e.g., technical questions and requests for documentation); and
- waste management (e.g., sludge management).

3.6.2.1 Outstanding Issues

Pretivm will attempt to resolve any outstanding issues in a timely manner by:

- obtaining additional information as necessary (either from the agency raising the issue, and/or from experts who can provide technical expertise on the issue where needed);
- proposing a new or revised response to the agency who raised the issue that is still outstanding and checking with the agency to determine whether the issue has been sufficiently addressed;
- If the issue is not perceived to be adequately addressed, taking further actions as needed (e.g., meeting with the agency if required) to discuss the issue; and
- reporting back to the agency on the status of the issue.

3.6.3 Proposed Plan for Consultation with Government Agencies during the Application/EIS Review

Once the Application/EIS is accepted for formal review, the 180-day review will be initiated, which will include a comment period for the EA Working Group as determined by the BC EAO. The BC EAO

¹² Consultations as well as issues raised by government agencies are tracked using consultation tracking software.

will also establish a 30-day public comment period. During the Application/EIS review stage, Pretivm will:

- distribute copies of the Application/EIS to government agencies¹³ via the EA Working Group;
- within any time limits set by the BC EAO, respond to comments submitted by government agencies during the review of the Application/EIS;
- attend EA Working Group meetings organized by the BC EAO and CEA Agency to explain the Application/EIS and respond to questions on the Application/EIS; and
- prepare a table that tracks issues raised by government agencies on the Application/EIS and includes responses to those issues.

Based on issues and concerns raised by government agencies during the Application/EIS review stage, as well as advice from the BC EAO, Pretivm will consider other measures to respond to issues and concerns raised by government agencies. Further, Pretivm will work to resolve any outstanding issues as per Section 3.6.2.1.

3.7 PUBLIC INFORMATION DISTRIBUTION AND CONSULTATION

3.7.1 Pre-Application/Pre-EIS Consultation with the Public

Pretivm's communications and consultations with the public, including local governments, tenure holders, and stakeholders, between November 1, 2011 and May 16, 2014, are summarized below. Detailed summaries of communications with the public are included in [Appendix 3-I](#). Public and stakeholder communications and consultation activities to date have included a public comment period on the draft AIR, open houses in five communities in northwest BC, private meetings with municipal governments, and interviews with land users and tenure holders as part of the land use baseline study for the EA.

3.7.1.1 *Communities near the Project*

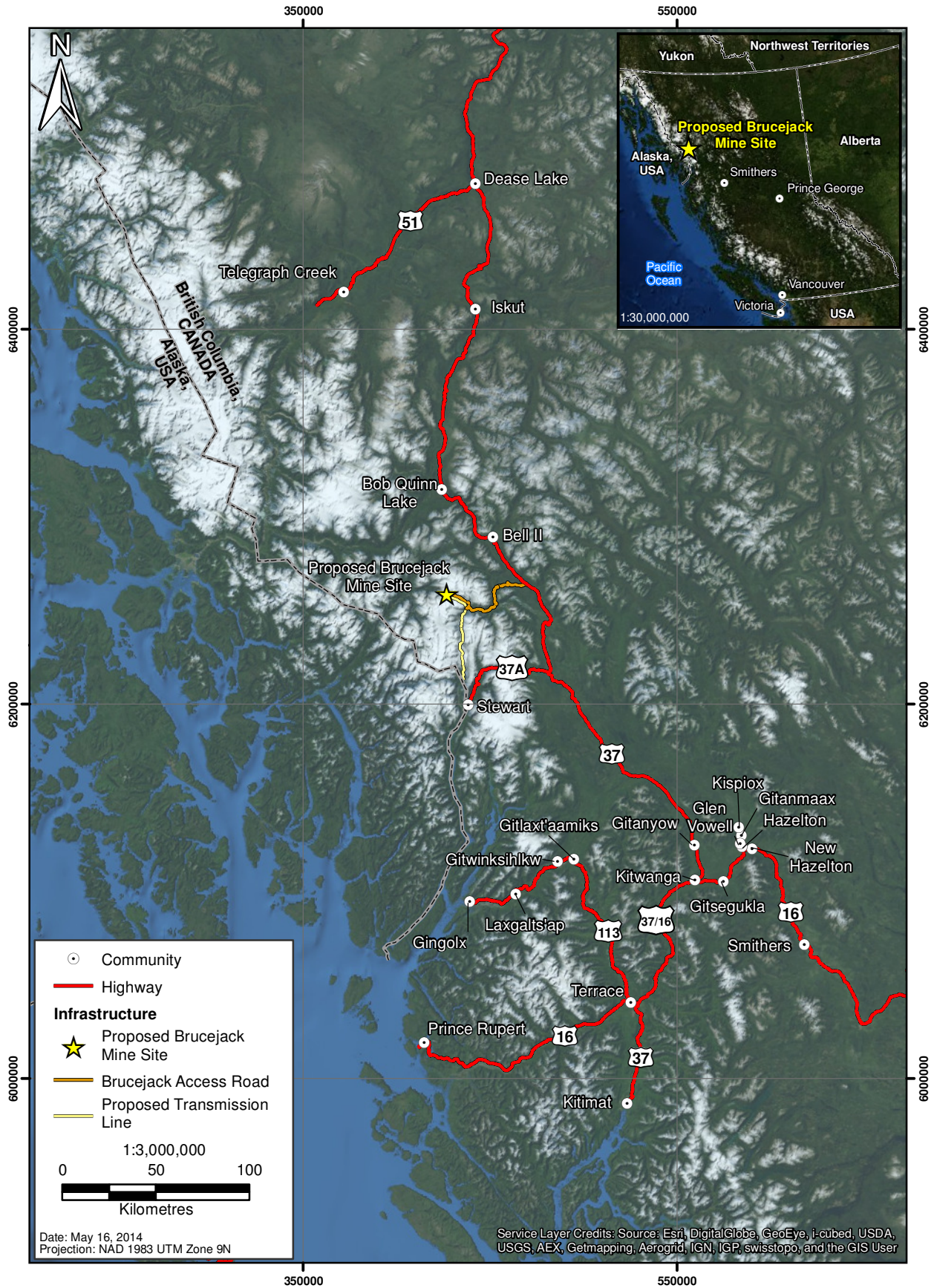
The District of Stewart is the closest municipality to the Project, located approximately 65 km north-northwest of Stewart. Over 150 km north of the Project off of Highway 37 are the predominantly Tahltan communities of Iskut, Telegraph Creek, and Dease Lake. Over 200 km to the south of the Project off of Highway 16 is the City of Terrace, the largest community in the vicinity of the Project. The Hazeltons and the Town of Smithers are located approximately 150 km and 200 km southeast, respectively, of the Project off of Highway 16. A number of Nisga'a, Gitksan, and Gitanyow communities are also in the vicinity of the Project (Figure 3.7-1).

3.7.1.2 *Public Consultation Plan*

Pretivm authored a Public Consultation Plan as directed by Section 18.1 of the Section 11 Order ([Appendix 3-M](#)). The Public Consultation Plan outlines Pretivm's approach to public engagement in the pre-Application stage, including increasing public awareness about the Project, identifying the potential adverse effects of the Project on public interests, public notification, issues tracking, and reporting. The Public Consultation Plan also includes a plan for public engagement during the Application review stage, reiterated in Section 3.4.3.

¹³ Consultation with local governments during the Application Review Phase, except where they are a member of the EA Working Group (e.g., RDKS), is discussed in the Public Consultation section below (Section 3.7.3).

Figure 3.7-1
Brucejack Gold Mine Project - Communities in the Regional Area



In accordance with Sections 18, 20, and 21 of the Section 11 Order, Pretivm will undertake the following activities during the pre-Application stage:

- advertise the dates of open houses and public comment periods a minimum of seven days in advance, using local media in compliance with the requirements of the BC EAO (Section 3.4.1.4);
- hold open houses in northwest communities, as directed by the BC EAO and CEA Agency to provide information on the Project to obtain and respond to public feedback and questions (Section 3.4.1.3);
- within time limits set by the BC EAO and CEA Agency, respond to issues that are identified in comments submitted by the public during the public comment period on the draft AIR (Section 3.4.1.3);
- meet with, present to, or otherwise engage interested groups about the Project to increase awareness about the Project and discuss local interests as well as potential measures to avoid or mitigate possible negative effects while enhancing positive effects of the Project (Sections 3.4.1.5 to 3.4.1.7 and [Appendix 3-I](#), Summary of Communications with the Public (until May 16, 2014));
- identify, compile, track, and, where possible, address issues raised by the public during engagement activities (Section 3.4.2 and [Appendix 3-J](#), Public Issues Tracking Table);
- develop a process for the resolution of outstanding issues (Section 3.4.2.1);
- implement additional measures for engagement as required by the BC EAO and CEA Agency; and
- within time limits set by the BC EAO, prepare reports for the BC EAO summarizing engagement during the pre-Application stage and the information, questions, and comments received from the public (within the scope of the EA) and how these were resolved, as well as next steps for ongoing public engagement (Section 3.4.1.10).

Based on issues and concerns raised by the public during the pre-Application/pre-EIS stage, and based on guidance from the BC EAO and CEA Agency, Pretivm will consider other measures to respond to issues and concerns raised by the public as necessary.

3.7.1.3 *Application Information Requirements and Open Houses*

One set of public comments was submitted to the BC EAO and posted to the e-PIC site on December 10, 2013 from a resident in Smithers, BC.¹⁴ The set of comments is summarized in Table 3.7-1 and included in the public issues tracking table in [Appendix 3-J](#), Public Issues Tracking Table. Pretivm has prepared responses to these comments and provided these to the BC EAO, who have posted them to the e-PIC site.

The BC EAO held five open houses in November 2013 to provide information on the EA process and obtain comments on the draft AIR (Table 3.7-2). Pretivm attended the open houses to provide information about the Project, and respond to questions or comments about the Project. Pretivm displayed nine posters on stands (8' x 3') describing the Project and baseline studies being conducted for the EA, and screened a short Project video throughout the duration of each open house. The BC EAO displayed two large posters describing the EA process and opportunities for public comment. Pretivm provided food and refreshments at each open house (including formal dinners in Gitlaxt'aamiks and Iskut). Pretivm also displayed an

¹⁴ http://a100.gov.bc.ca/appsdata/epic/documents/p395/1386714861665_9ce23d41acf6ad56050e655743eb04a04b2936cc97a313a2c00a652fd10133bf.pdf

information booklet about the Project, large maps of the Project area, copies of the Aboriginal Consultation Plan and Public Consultation Plan, and copies of the draft AIR. Pretivm also provided feedback forms and an anonymous box for the public to comment on the Project and evaluate the open house format. These comments are summarized in Table 3.7-3, along with the questions and comments Pretivm recorded at the open houses. The majority of the comments and questions are from the meeting in Gitlaxt'aamiks where the community requested a question and answer session following dinner. At the other open houses, smaller discussions took place between Pretivm, the BC EAO, and attendees.

Table 3.7-1. Summary of Comments Received during the Draft AIR Public Comment Period

Comment (Date Received)	Summarized Comment
Member of the Public, Smithers (Dec. 10, 2013)	<ul style="list-style-type: none"> • Concern about tailings deposition in Brucejack Lake. <ul style="list-style-type: none"> ○ Rationale for this method of tailings management. ○ Baseline information about the limnology, hydrology, and aquatic resources of Brucejack Lake needed; would also like to see baseline (ideally pre-exploration) data for Bowser Lake. • Potential effects to eulachon. <ul style="list-style-type: none"> ○ What is the current status and population trend of eulachon in the Nass and Unuk rivers? ○ Assessment boundaries are inadequate to assess this. • Greenhouse gas emissions should get a full “lifecycle” accounting, including all mine related activities; e.g., access road/s, hydro line construction, exploration drilling, mining and onsite infrastructure, waste disposal, helicopter support, transport and shipping of concentrate, etc. • Will erosion control and emergency response plans address potential storm events that could exceed 100-year maximums? • Plan for re-vegetating road cutbanks and cleared right-of-ways; e.g., commercial seed mix that will attract bears and grizzlies? • Transboundary effects (via Sulphurets Creek and Unuk River). • Adequacy of upfront bonding to cover reclamation costs, monitoring, and maintenance. • Table 7.4-1, terrestrial environment theme should include avalanche track ecosystems as a valued subcomponent. • How will the cumulative effects assessment (Section 10.6) be conducted? <ul style="list-style-type: none"> ○ Which projects will be included/considered, including contemporary and previous? • Contesting statement (p. 9-17) that fish habitat will not be altered, disrupted or destroyed.

Table 3.7-2. Summary of British Columbia Environmental Assessment Office Open Houses

Date and Time	Location	Venue	Number of Attendees
November 25, 2013, 4:30 p.m.-8:00 p.m.	Gitlaxt'aamiks (New Aiyansh), BC	Gitmidiik Hall	~40
November 26, 2013, 4:30 p.m.-8:00 p.m.	Stewart, BC	Al Lawrence Memorial Centre	~20
November 27, 2013, 4:00 p.m.-7:30 p.m.	Hazelton, BC	St. Peter's Anglican Church	~45
November 28, 2013, 10:30 a.m.-1:00 p.m.	Dease Lake, BC	Dease Lake Community Hall	8
November 28, 2013, 5:00 p.m.-7:30 p.m.	Iskut, BC	Klappan Independent Day School Gymnasium	9

Table 3.7-3. Summary of Comments and Questions Raised at the British Columbia Environmental Assessment Office Open Houses

Open House	Summary of Comments and Questions
Gitlaxt'aamiks (New Aiyansh), BC	<p><u>Water Quality and Tailings</u></p> <ul style="list-style-type: none"> • Effects to groundwater (underground water tables; where and how does Brucejack Lake connect to underground water tables). • Concern about impacts to Brucejack Lake (water quality, tailings management, capacity of the lake to contain the tailings, impacts to fish in the lake). • How will the tailings stay settled in the bottom of the lake? • Why deposit tailings under the lake? Why not use a tailings management facility? Where are the tailings stored before being deposited in lake? • Water quality effects downstream of Brucejack Lake. • Concern that with climate change and changing water levels, predictions related to tailings and water management may be inaccurate. • What has been/is being done to avoid impacts to Bowser Lake, which feeds into the Nass? • What “security” is in place to protect the Bowser River? • Concern about leaching of chemicals from tailings, and water quality (how is leaching in lake prevented?). • What is the lifespan of the cement mix that will be mixed with tailings and backfilled? • How do you factor in the natural movement of rivers; i.e., concern that clean rivers will, over time, migrate into polluted Brucejack Lake. • Will water quality of glacier run-off be affected? • If there are going to be impacts downstream, we want to know about them. • Interested in long-term impacts on water and the environment. <p><u>Accidents and Spills</u></p> <ul style="list-style-type: none"> • Concern about accidental spills along access road polluting receiving environment/waterways. <p><u>Transportation and Shipping</u></p> <ul style="list-style-type: none"> • How much of Nisga’a Lands does the Brucejack Access Road cross through? • What will be transported on the road? • Where will the ore be shipped to? <p><u>Employment and Training</u></p> <ul style="list-style-type: none"> • How many Nisga’a are employed by the Project currently? How many from other First Nations? • Hire locals from Nisga’a villages to staff the Project and treat them fairly. • Supportive of Project because of employment opportunities. • Notify us right away regarding employment. We have 72 individuals in New Aiyansh that have trades certificates but no apprenticeships. • Solicit the unions and contractors so we can start talking to them. • We do not want to be small labourers; we are skilled, trained, and have local knowledge. • When getting closer to jobs becoming available, recommends forming a task force group. <p><u>Monitoring and Closure</u></p> <ul style="list-style-type: none"> • Environmental monitoring. • Do you have photos of other Pretivm projects that have been successfully closed? • You need to prove to us/show us how safe your Project is going to be; use visuals to communicate. • How long has Pretivm been around? • What is Pretivm’s proven track record/success rate developing and closing other projects? • What is Brucejack going to look like after this Project is done?

(continued)

Table 3.7-3. Summary of Comments and Questions Raised at the British Columbia Environmental Assessment Office Open Houses (completed)

Open House	Summary of Comments and Questions
Gitlaxt'aamiks (New Aiyansh), BC (cont'd)	<p><u>Project Description</u></p> <ul style="list-style-type: none"> • How big is the deposit? Where is the exploration occurring (is it in the Nass Area)? • Question about water purification. • Have you used cement backfill (in underground workings) elsewhere? • How deep underground will this mine go? • How much surface area will the mine cover? • What is the composition of the cement? <p><u>Consultation and EA Process</u></p> <ul style="list-style-type: none"> • Are we going to see the results of the negotiations with Nisga'a Lisims Government (NLG)? • Recommendation to show how the bottom of the lake is shaped and how it can hold the tailings - need a visual. • Are you having this meeting in other communities (other Nisga'a villages)? • Commented on the low turnout. • Get notices out into mailboxes. • Would like information materials in advance of the meeting. • Communicate well in advance of a community meeting with Village Governments. • Noted a (perceived) absence of discussion of TK.
Stewart, BC	<p><u>Infrastructure</u></p> <ul style="list-style-type: none"> • Potential impacts to infrastructure and health services. <p><u>Transportation and Shipping</u></p> <ul style="list-style-type: none"> • Impacts to harbour including water quality. • Cumulative effects from increased traffic on Hwy 37A (including effects to tourism- approximately 40,000 tourists per summer and many drive RVs). <p><u>Project Benefits</u></p> <ul style="list-style-type: none"> • Stewart wants to enter into a revenue sharing agreement with the province; industry can lobby government to help with this. • The Project will be an economic boost for BC and especially Stewart.
Hazelton, BC	<p><u>Project Benefits</u></p> <ul style="list-style-type: none"> • Very positive for the local economy. • Small Project footprint. • Could be a major employer in Hazelton. • Supportive - potential jobs. • When will jobs become available? <p><u>Consultation</u></p> <ul style="list-style-type: none"> • Would like to be presented with more research. • Recommend not holding public meetings during the daytime. <p><u>Water Quality and Tailings</u></p> <ul style="list-style-type: none"> • Tailings management. • Water quality in Brucejack Lake.
Dease Lake, BC	<ul style="list-style-type: none"> • Employment opportunities. • Location of Tahltan territory in relation to the Project. • How will the tailings be managed?
Iskut, BC	<ul style="list-style-type: none"> • Are there fish in Brucejack Lake? • How many Tahltan are working at the Project? • Interest in jobs. • Supportive of the Project (jobs).

On November 20, 2013, Pretivm emailed representatives of the City of Terrace, Town of Smithers, District of Hazelton, District of Stewart, and the Regional District of Kitimat-Stikine (RDKS), as well as a variety of stakeholders (economic development associations, chambers of commerce, social service and health providers, educational institutions, etc.) and tenure holders (trapline and commercial recreation tenure holders), inviting them to the open houses and advising of the public comment period on the draft AIR. A notification was attached to each email ([Appendix 3-F](#), Notice of Open Houses (Pretivm)).

Pretivm also liaised with local governments in the four Nisga’a villages, Hazelton, Stewart, Smithers, and via the TCC for Dease Lake and Iskut and distributed a community notification poster for posting in public areas in town notifying the public of the open houses ([Appendix 3-F](#), Notice of Open Houses (Pretivm)). At the request of Skii km Lax Ha, Pretivm provided a Skii km Lax Ha representative with 300 small printed fliers advertising the Hazelton open house for door-to-door distribution via the waste disposal pick-up service in Hazelton, along with 10 community notification posters ([Appendix 3-F](#)).

3.7.1.4 Consultations with Tenure and Licence Holders

Table 3.7-4 lists the dates of interviews with tenure holders. The primary purpose of the interviews was to obtain information about the nature of the tenure and potential impacts of the Project on their business interests. The results of these interviews are summarized in the Application/EIS (Chapter 24, Assessment of Potential Commercial and Non-commercial Land Use Effects, and [Appendix 24-A](#), Brucejack Gold Mine Project: Non-traditional Land Use Baseline). Chapter 24 includes maps depicting tenures and licences held within the land use study area as follows: guide outfitting licences (Figure 24.3-3), trapline licences (Figure 24.3-4) and commercial recreation licenses (Figure 24.3-5). Issues and concerns raised by interviewees are summarized and included in Section 3.7.2 and [Appendix 3-1](#), Summary of Communications with the Public (until May 16, 2014).

Table 3.7-4. Summary of Interviews with Tenure and Licence Holders

Tenure Holder	Interview Date
Bear Enterprises	October 24, 2013*
Last Frontier Heliskiing	August 22, 2012
Milligan Outfitting (Coast Mountain Outfitters)	August 24, 2012
Misty Mountain Outfitters**	January 11, 2013
Spey Lodge**	June 22, 2012
Tenure 601074	November 13, 2013*
Trapline TR0621T001	August 22, 2012; November 5, 2013*

* Interview dates marked with * indicate that questions pertaining to navigation of waterways in the Project area were included.

** Tenure holders marked with ** next to their name indicate that attempts were made to arrange a secondary interview to discuss navigation of waterways in the Project area, but no follow-up interview has been done (i.e., no response to date).

3.7.1.5 Consultations with Local Governments

Pretivm has met with representatives of the City of Terrace and the Town of Smithers (Mayor, Mayor and Council) several times between 2011 and 2012, and has also met with the RDKS. The RDKS is a member of the BC EAO Project Working Group and had the opportunity to tour the site on September 5, 2014; however, the RDKS was unable to attend at that time (Sections 3.3 and 3.6.1).

3.7.1.6 *Conferences and Panels*

Table 3.7-5 summarizes Pretivm’s participation in conferences and panels to date. Participation in Aboriginal events and forums are not documented in this report and are included in the *Brucejack Gold Mine Project: Pre-Application Aboriginal Consultation Report* (ERM Rescan 2014a).

Table 3.7-5. Participation in Conferences and Panels

Date	Name of Conference/Event	Location	Description
May 21-23, 2014	Minerals North	Vanderhoof	Delegation
May 9, 2014	Smithers Mining Week Luncheon Panel, “Community Resources”	Smithers	Panelist
February 19-21, 2014	Rock Talk 2014, Smithers Exploration Group	Smithers	Presenter
January 28, 2014	Round-Up Luncheon	Vancouver	CEO, Keynote Speaker
January 22, 2014	BC Natural Resource Forum	Prince George	CEO, Speaker
January 21, 2014	Initiatives Prince George/ Market Expansion Forum	Prince George	CEO, Speaker
September 27, 2013	Society of Economic Geologists Conference	Whistler	Technical Session Presenter
September 26, 2013	CIM Luncheon	Vancouver	CEO, Keynote Speaker
April 24-26, 2013	Minerals North	Terrace	Sponsor
March 5, 2013	PDAC	Toronto	Received Exploration Award
January 28, 2013	Round-Up	Vancouver	Technical Session Presenter, Sponsor
September 19, 2012	Brucejack Technical Session	Public Webcast	Project Technical Overview
May 23-25, 2012	Minerals North	Burns Lake	Sponsor
March 4-5, 2012	PDAC	Toronto	Core Shack
January 23, 2012	Round-Up	Vancouver	Technical Session Presenter, Core Shack, Sponsor
November 2, 2011	AME BC Luncheon	Vancouver	CEO, Keynote Speaker
April 27-29, 2011	Minerals North	Stewart	Sponsor
January, 2011	Round-Up	Vancouver	Exhibitor, Sponsor

3.7.1.7 *Donations*

Table 3.7-6 summarizes Pretivm’s community donations to date as part of its efforts to support communities in the vicinity of its operations.

3.7.1.8 *Community Contact*

Pretivm has included various contact methods (email, phone, and website) for the public to get in touch with questions or comments. These methods have been advertised on information materials displayed at open houses and provided to stakeholders. On August 1, 2013, Pretivm opened its office in Smithers, BC.

3.7.1.9 *Public Consultation Reports*

In compliance with Section 20 of the Section 11 Order, Pretivm prepared consultation reports consistent with the Public Consultation Plan. The public consultation reports summarize Pretivm’s consultation efforts with the public (including local governments, land users and tenure holders, and

stakeholders); summarize the information, questions, and comments received from the public within the scope of the EA and provide responses, and outline next steps for public consultation activities.

Table 3.7-6. Summary of Donations

Date	Community/Organization	Description
February 2014	New Hazelton	Donated refurbished laptops
December 2013	Bear Valley School, Stewart	Donated funds for holiday celebration
April 2013	New Hazelton Elementary School, Parent Advisory Council	Donated funds for playground equipment
March 2013	New Hazelton	Donated 14 refurbished laptops
March 2013	Mayor's Office, District of Stewart	Contributed a 250-copy print-run of a marketing feature on the district of Stewart in the <i>International Resource Journal</i>
May 2012	Bear Valley School, Stewart	Donated funds for school celebration

The *Brucejack Gold Mine Project: Interim Pre-Application Public Consultation Report* (ERM Rescan 2014a) covered the period from November 1, 2011 to the close of the public comment period on the draft AIR on December 13, 2013. Pretivm revised the report based on the BC EAO's comments and submitted the final version to the BC EAO on March 19, 2014. Pretivm will submit the *Brucejack Gold Mine Project: Pre-Application Public Consultation Report* (ERM Rescan 2014c), covering the period from November 1, 2011 to March 31, 2014, to the BC EAO in June 2014 ([Appendix 3-N](#), Pre-Application Public Consultation Report).

3.7.2 Issues Raised by the Public and Responses

[Appendix 3-J](#) contains a tracking table that documents the issues raised by the public until May 16, 2014 during the DAIR open houses, comments during the DAIR public comment period, interviews with tenure holders, and correspondence relating to the proposed Project.¹⁵ These tables list the issues raised by the public, stakeholders, and local government, and Pretivm's responses explaining how each issue has been considered and addressed. The responses provided in the tables reference where in the Application/EIS additional information is available.

The public raised concerns in the following areas:

- Aboriginal issues (e.g., relation of Project to Nass River and Nass Area);
- accidents and malfunctions (e.g., spills);
- climate (e.g., greenhouse gas accounting);
- consultation (e.g., methods);
- cumulative effects (e.g., methodology);
- education and training;
- employment/economic opportunities (e.g., availability and types of jobs);
- fish and fish habitat (e.g., effects to Brucejack Lake);

¹⁵ Consultations as well as issues raised by the public, including local governments, stakeholders, and land users, are tracked using a consultation tracking software.

- guiding/outfitting (e.g., impacts to operations/business);
- hunting/trapping (e.g., changes to access);
- hydrogeology (e.g., effects to water tables);
- infrastructure and services (e.g., impacts to service provision);
- Project closure (e.g., adequacy of bonding);
- rights and title (e.g., location of traditional territories relative to the Project);
- tailings management (e.g., capacity of Brucejack Lake; methods);
- vegetation and soils (e.g., re-vegetation);
- water quality (e.g., effects to Brucejack Lake, and surrounding water bodies); and
- wildlife (e.g., effects to bears).

3.7.2.1 *Outstanding Issues*

Pretium will continue to respond to comments from the public in a timely manner. In the event that the public were to express significant and/or widespread concerns about the Project, Pretium will consider holding additional open houses, and/or targeted meetings with stakeholders (including local governments and tenure holders) as practicable to provide additional information and respond to questions and comments. At the time of writing this chapter, there are no outstanding issues ([Appendix 3-J](#) contains an issues tracking table documenting issues raised by the public to date and Pretium's responses).

3.7.3 **Proposed Plan for Consultation with the Public during the Application/EIS Review**

Once the Application/EIS is accepted for formal review, public comment periods will be held by the BC EAO and CEA Agency. The full Application/EIS will be viewable on the BC EAO's public registry, the e-PIC site. In accordance with Sections 19, 20, and 21 of the Section 11 Order and CEA Agency requirements, Pretium will undertake the following activities:

- advertise open houses and the public comment period a minimum of seven days in advance, using local media in compliance with the requirements of the BC EAO;
- make copies of the Application/EIS publicly available for the duration of the public comment period in northwest communities within the vicinity of the Project area, as directed by the BC EAO and CEA Agency;
- hold open houses in northwest communities within the vicinity of the Project area, as directed by the BC EAO and CEA Agency, to present the information contained in the Application/EIS, obtain public feedback, and to answer questions;
- within time limits set by the BC EAO and CEA Agency, prepare reports summarizing engagement during the Application review stage and the information, questions, and comments received from the public (within the scope of the EA) and how these were resolved, as well as next steps for ongoing public engagement;
- within time limits set by the BC EAO and CEA Agency, respond to issues that are identified in comments submitted by the public during the formal public comment period for review of the Application/EIS;

- where requested, and within any time limits set by the BC EAO and CEA Agency, provide additional information, to that provided in the Application/EIS;
- by mutual agreement, arrange meetings or other means of engaging with identified public interests groups to resolve outstanding issues related to the Project;
- implement additional measures for engagement as required by the BC EAO and Agency; and
- within time limits set by the BC EAO, prepare reports for the BC EAO summarizing engagement during the pre-Application stage and the information, questions, and comments received from the public (within the scope of the EA) and how these were resolved, as well as next steps for ongoing public engagement.

Based on issues and concerns raised the public and stakeholders during the Application/EIS review stage, and based on guidance from the BC EAO and CEA Agency, Pretivm will consider other measures to respond to issues and concerns raised by the public and stakeholders as necessary. Information distribution materials will be developed for use during this stage (information handouts, posters, etc.).

REFERENCES

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