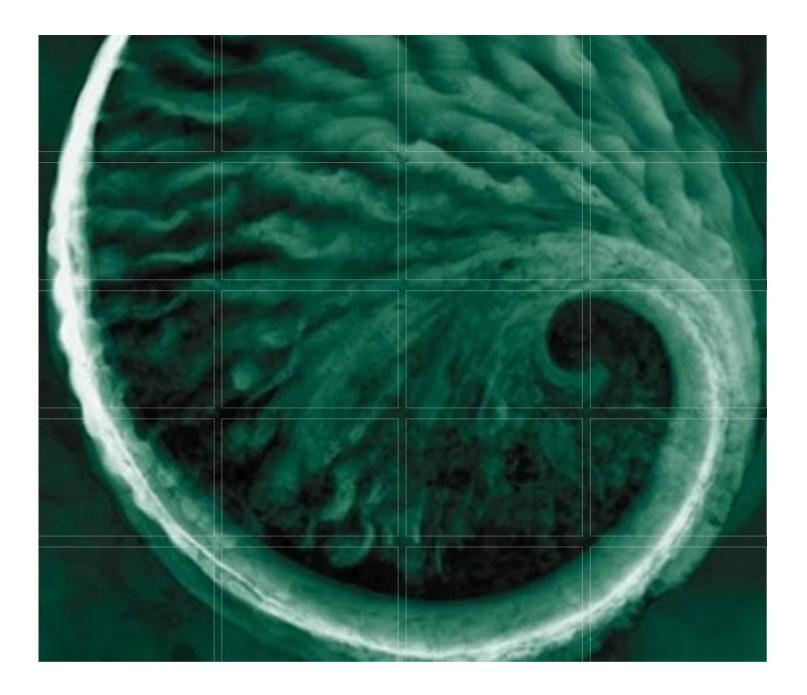
### **BRUCEJACK GOLD MINE PROJECT**

Application for an Environmental Assessment Certificate / Environmental Impact Statement

## Appendix 3-L

Pre-Application Aboriginal Consultation Report





Prepared for:



BRUCEJACK GOLD MINE PROJECT

Pre-Application Aboriginal Consultation Report

June 2014



#### **Pretium Resources Inc.**

### BRUCEJACK GOLD MINE PROJECT

# **Pre-Application Aboriginal Consultation Report**

June 2014

Project #0194151-0117

#### Citation:

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### BRUCEJACK GOLD MINE PROJECT

## **Pre-Application Aboriginal Consultation Report**

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#### GLOSSARY AND ABBREVIATIONS

Terminology used in this document is defined where it is first used. The following list will assist readers who may choose to review only portions of the document.

AIR Application Information Requirements

**Application** Application for an Environmental Assessment Certificate

BC EAO British Columbia Environmental Assessment Office

CEA Agency Canadian Environmental Assessment Agency

**EA** Environmental Assessment

EIS Environmental Impact Statement

ESCIA Economic, Social, Cultural Impact Assessment

GCO Gitxsan Chiefs Office

GDC Gitxsan Development Corporation

**GFA** Gitanyow Fisheries Authority

GHC Gitanyow Hereditary Chiefs

IBA Impact Benefit Agreement

LSA Local Study Area

MNBC Métis Nation BC

NAE Nass Area Enterprises

**NFA** Nisga'a Final Agreement

NLG Nisga'a Lisims Government

PEA Preliminary Economic Assessment

**Project, the** Brucejack Project, the

**RSA** Regional Study Area

TCC Tahltan Central Council

THREAT Tahltan Heritage Resources Environmental Assessment Team

**TK/TU** Traditional Knowledge/Traditional Use

**TNDC** Tahltan Nation Development Corporation

VC Valued Component

PRETIUM RESOURCES INC.

#### 1. REPORT PURPOSE AND ORGANIZATION

Pretium Resources Inc. (Pretivm) is proposing to develop an underground gold and silver mine, the Brucejack Gold Mine Project (the Project), with a production capacity of 2,700 tonnes per day over a minimum 22-year mine life, approximately 65 km north-northwest of Stewart, BC. The proposed Project is subject to the British Columbia *Environmental Assessment Act* (BC EAA; 2002) and the *Canadian Environmental Assessment Act*, 2012 (2012). 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 *Nisga'a Final Agreement* (NFA; Figures 1-1 to 1-3).

This report is intended to fulfill the requirement outlined in Section 17 of the Section 11 Order issued by the BC Environmental Assessment Office (BC EAO) on July 4, 2013 under the BCEAA 2002 (BC EAO 2013) to prepare a report consistent with the Aboriginal Consultation Plan (Rescan 2013; submitted to the BC EAO on September 3, 2013)¹. The Order identifies the Aboriginal groups that must be consulted with respect to the potential effects of the Project. These groups include Skii km Lax Ha, Tahltan Nation, represented by the Tahltan Central Council (TCC), and Nisga'a Nation, represented by Nisga'a Lisims Government (NLG).

As per the Section 11 Order (Section 17), Pretivm circulated an Interim Pre-Application Aboriginal Consultation Report, which covered Pretivm's consultation activities with Aboriginal groups until November 30, 2013, to Skii km Lax Ha, TCC and Tahltan Heritage Resources Environmental Assessment Team (THREAT), and NLG on December 16, 2013 for comment (ERM Rescan 2014). Comments were received from Skii km Lax Ha and NLG and incorporated into the final version submitted to BC EAO on February 14, 2014. This report builds on the interim report and covers consultation activities up until March 31, 2014<sup>2</sup>. This report also contains draft responses to the issues raised by Aboriginal groups to date.

The Environmental Impact Statement (EIS) Guidelines released by the Canadian Environmental Assessment Agency (CEA Agency) on May 24, 2013 for the Project reiterate that the *Canadian Environmental Assessment Act*, 2012 (2012) contains provisions for communication and cooperation with Métis; specifically, the Guidelines direct Pretivm to make key summary documents available to the Métis Nation BC and ensure this group's views are heard and recorded. The term "Aboriginal" is used throughout the report to be inclusive of First Nations, including any huwilp and Treaty Nations, and Métis. The report discusses consultation and issues tracking efforts with Aboriginal groups in the Project vicinity who are not listed in the Section 11 Order.

As per the Section 11 Order, this report:

• summarizes Pretivm's efforts to consult with Aboriginal groups (Skii km Lax Ha and Tahltan Nation) and comply with the Aboriginal Consultation Plan (Sections 2 and 3);

PRETIUM RESOURCES INC. 1-1

<sup>&</sup>lt;sup>1</sup> Prior to submitting the Aboriginal Consultation Plan to BC EAO, Pretivm distributed a draft version of the plan to Skii km Lax Ha, Tahltan Nation, and Nisga'a Nation for review. Skii km Lax Ha provided several comments, which were addressed and the final plan modified. Nisga'a Nation reviewed the plan and did not have any comments and Tahltan Nation did not provide comments.

<sup>&</sup>lt;sup>2</sup> The Interim Pre-Application Aboriginal Consultation Report covered consultation activities up until November 30, 2013.

Figure 1-1 Skii km Lax Ha Traditional Territory



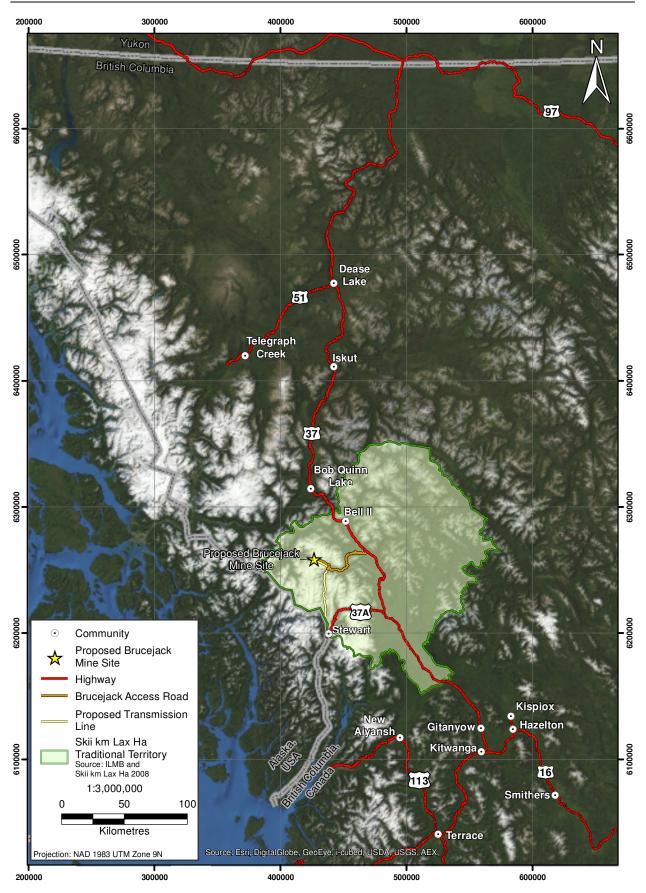


Figure 1-2
Tahltan Nation Traditional Territory



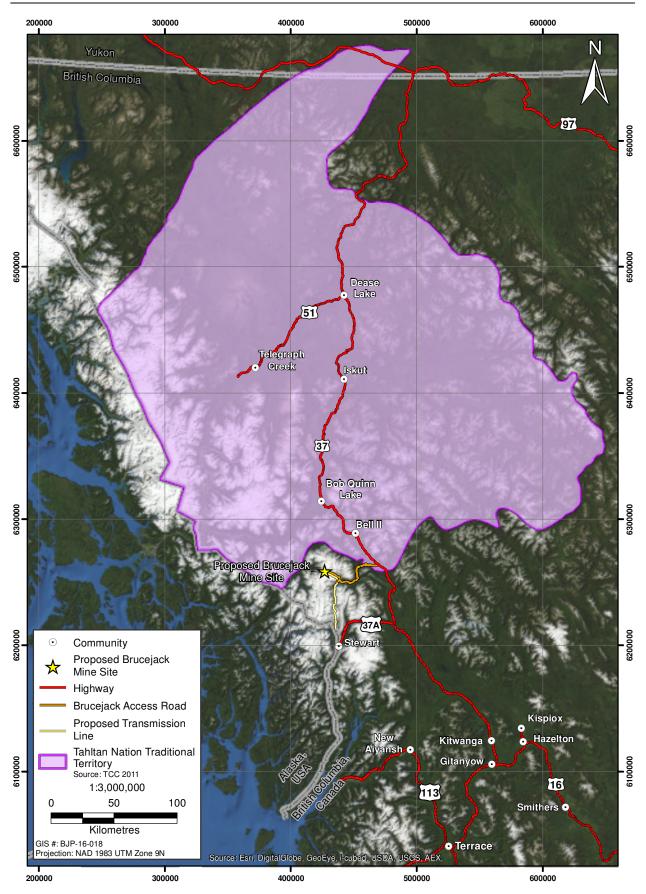
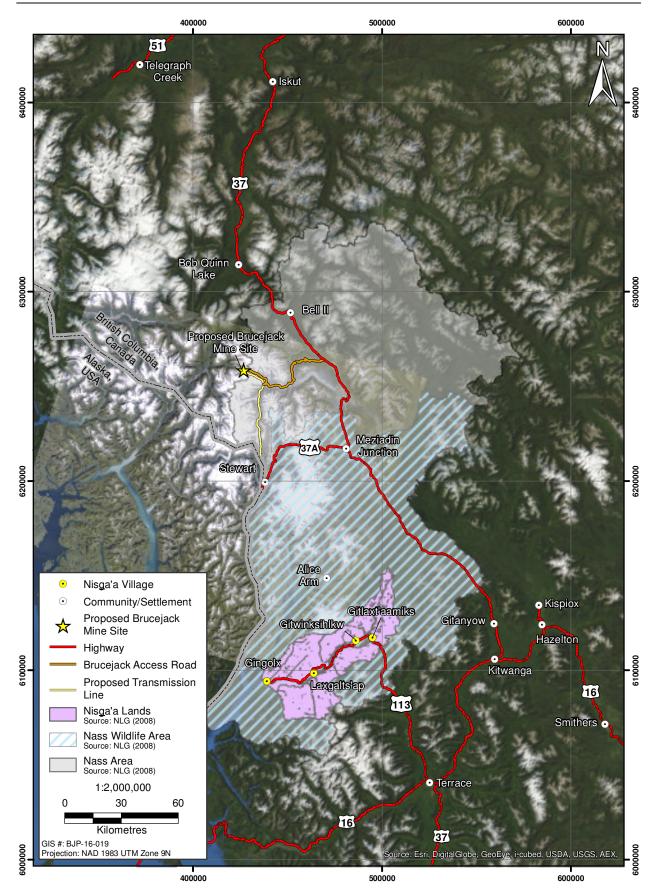


Figure 1-3 Nisga'a Lands, the Nass Wildlife Area and the Nass Area





- summarizes Pretivm's efforts to consult with Nisga'a Nation and comply with the Aboriginal Consultation Plan (Sections 2 and 3, including sub-section 3.5);
- identifies 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 (Section 4);
- identifies the potential adverse impacts of the proposed Project on the rights and interests of the Nisga'a Nation under the NFA 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 (Section 4); and
- proposes next steps and future consultation activities, noting any differences than those outlined in the Aboriginal Consultation Plan (Section 5).

A draft of this report was provided to Skii km Lax Ha, TCC and THREAT, and NLG on April 17, 2014 for review and comment, prior to submitting the report to BC EAO. Skii km Lax Ha provided comments on the Skii km Lax Ha issues tracking table (Appendix E) on May 14, 2014. These comments and Pretivm's responses are included in a tracking table in Appendix I. Pretivm met with THREAT on May 16, 2014 and discussed the consultation report at that time. THREAT stated a written response is forthcoming (at the time of writing this has not been received). Pretivm has not received comments from NLG to date. An earlier consultation report, the *Brucejack Gold Mine Project: Interim Pre-Application Aboriginal Consultation Report* was provided Skii km Lax Ha, TCC and Tahltan Heritage Resources Environmental Assessment Team (THREAT), and NLG on December 16, 2013 for review and comment. Comments were received from Skii km Lax Ha and NLG and the report subsequently revised. Those revisions have been carried through into this consultation report.

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#### 2. INFORMATION DISTRIBUTION

Pretivm has developed and distributed informational materials to increase public awareness and understanding of the Project. These materials are summarized as follows<sup>3</sup>:

- 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
    - o Reserves and Resources
    - Claim Boundary Map
    - Drilling
    - o Brucejack Geology Summary
    - o Technical Reports;
- Project information booklet;
- Project posters/storyboards:
  - Pretium Resources Inc. (Pretivm)
  - Project Overview (1)
  - Project Overview (2)
  - Project Components and Environmental Design
  - Mine Lifecycle and Employment
  - Environmental Study Program (1)
  - Environmental Study Program (2)
  - Human Environment Study Program
  - Public Participation and Aboriginal Consultation; and
- Pretivm PowerPoint presentations.

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<sup>&</sup>lt;sup>3</sup> The Information Distribution and Consultation Chapter in the Application/EIS will include copies of outreach materials in the appendices.

## 3. SUMMARY OF 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 March 31, 2014 are summarized below. Detailed summaries of communications with these groups are included in Appendices A through C (Appendix A for Skii km Lax Ha, Appendix B for Tahltan Nation, and Appendix C for Nisga'a Nation)<sup>4</sup>. Appendix D 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 Métis Nation BC (MNBC), Gitxsan Nation, and Gitanyow First Nation.

#### 3.1 NOTIFICATION OF THE 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<sup>5</sup>. These meetings occurred prior to Pretivm formally entering the provincial and federal environmental assessment (EA) processes. The BC EA process was initiated on February 6, 2013 when the BC issued the Section 10 Order under the BC EAA. The federal EA process was initiated when the Canadian Environmental Assessment Agency issued a public notice on March 25, 2013 indicating an EA is required for the Project.

#### 3.2 Brucejack Gold Mine Project EA Working Group

The BC EAO/CEA Agency established the Brucejack Gold Mine Project EA Working Group in May 2013 and invited representatives of Skii km Lax Ha, Tahltan Nation and Tahltan Heritage Resources Environmental Assessment Team (THREAT), and Nisga'a Nation (NLG) to participate on the EA Working Group. Other EA Working Group members include representatives of federal and provincial government agencies, and local governments. To date, there has been one EA Working Group meeting, held on September 4, 2013. Pretivm attended this 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 the Skii km Lax Ha, THREAT and NLG. Agenda items included:

- provincial and federal EA process;
- EA Working Group Terms of Reference;

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<sup>&</sup>lt;sup>4</sup> The consultation summary tables in Appendices A through 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 the rights and interests of the Nisga'a Nation under the NFA, could 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. Each instance of Pretivm-initiated contact is recorded in Appendices A through D.

<sup>&</sup>lt;sup>5</sup> Pretivm also met with representatives of the Gitanyow First Nation and Gitxsan 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 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 Appendix D.

- Valued Component Guideline; and
- Project overview.

#### 3.3 APPLICATION INFORMATION REQUIREMENTS (AIR) AND OPEN HOUSES

The BC EAO provided the 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 for an Environmental Assessment Certificate (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.

The BC EAO held a 30-day comment period on the draft AIR, which commenced on November 13 and ended on December 13, 2013. Hard copies of the draft AIR were provided to the Gitlaxt'aamiks/New Aiyansh government office, Dease Lake Northern Lights College, and the public library in Hazelton<sup>6</sup>. During the comment period, the BC EAO held open houses in five communities in northwest BC (Table 3.3-1). Comments and issues raised at the open houses are summarized in the Pre-Application Public Consultation Report, submitted to BC EAO under separate cover.

Table 3.3-1. Open Houses held during the Draft AIR Comment Period

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

<sup>\*</sup>Note: Pretivm provided and advertised return transportation from Telegraph Creek to the Dease Lake Open House through TCC. As only one individual signed up for the trip TCC decided not to run the vehicle.

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)

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<sup>&</sup>lt;sup>6</sup> Copies of the Draft AIR were also placed in Smithers, Terrace and Stewart at the public libraries.

inviting them to the open houses. Pretivm also placed notifications in local newspapers<sup>7</sup> commencing on November 6, 2013 and running for three weeks. 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). 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.

On November 21, 2013 Pretivm also notified, by email, the Métis Nation BC, 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.

#### 3.4 TRADITIONAL KNOWLEDGE/TRADITIONAL USE STUDIES

Research on the use of lands and resources by Aboriginal groups near the Project was conducted between April 2012 and February 2014. Research consisted of a comprehensive ethnographic literature review to provide regional context on cultural and land use trends, a Métis Interests Desktop Study, and, in the case of the Skii km Lax Ha, a Traditional Knowledge and Traditional Use (TK/TU) Study to detail site-specific uses based on primary source interviews and mapping exercises.<sup>8</sup> A draft of the *Brucejack Gold Mine Project: Ethnographic Overview Report* was distributed to Skii km Lax Ha, Tahltan Nation, and Nisga'a Nation for comment on August 12, 2013. No comments have been received to date.

Skii km Lax Ha were collaboratively engaged to conduct TK/TU studies, and participate in semi-structured interviews as well as a mapping session in February 2013. Interview questions focused on historic and current traditional uses and/or knowledge of their traditional territory. Maps were provided for interviewees to geographically locate uses and values, where appropriate. Interviews were recorded, both in writing and by audio record. The results of the TK/TU study were provided to the Skii km Lax Ha for their review and input prior to finalizing the *Brucejack Gold Mine Project: Skii km Lax Ha Traditional Knowledge and Traditional Use Report.* Follow-up communications with the Skii km Lax Ha in May 2013, November 2013, and February 2014 helped address gaps or errors on the information collected during the mapping session.

The proponent offered to fund and work with Nisga'a Nation and Tahltan Nation to undertake their own TK/TU studies. Nisga'a Nation no longer conducts TK/TU studies as the NFA characterizes their rights, interests and values regarding land and resource use. Nisga'a Nation has had the opportunity to provide inputs to this chapter through their involvement with an Economic, Social, Cultural Impact Assessment (ESCIA; see below). Pretivm is in discussion with THREAT about developing a TK/TU study. To date, no agreements have been signed or funding provided.

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PRETIUM RESOURCES INC. 3-3

 $<sup>^{7}\,\</sup>mathrm{Ads}$  were placed in Smithers Interior News, Terrace Standard, and Northern Connector.

<sup>&</sup>lt;sup>8</sup> All reports will be appended to Pretivm's Application/EIS.

#### 3.5 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, CEAA, 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.

#### 3.6 Project Design Changes

Pretivm has considered, and will continue to consider, comments received from members of the EA Working Group and Aboriginal leadership as they pertain to Project design, as well as to Construction, Operation, Closure, and Post-closure. To date, no substantive Project design changes have been warranted as a result of Aboriginal or public concern.

#### 3.7 Training

Pretivm will adopt a number of policies or company strategies that consider the needs of workers from Aboriginal and regional communities and are aimed at increasing the level of employment participation in the Project. The Assessment of Potential Economic Effects, to be included in Pretivm's Application/EIS, will provide additional detail about training. 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.

#### 3.8 ABORIGINAL FIELD ASSISTANTS AND PROJECT EMPLOYMENT

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

#### 3.9 Brucejack Gold Mine Project Site Visits

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, 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, flew up Highway 27 and then along the access road to camp. Participants toured the property including the core shack.
- June 19, 2013: Nass Area Enterprises (NAE)
  - Met NAE 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.

PRETIUM RESOURCES INC. 3-5

#### 4. ISSUES SUMMARY

Appendices E through H (E for Skii km Lax Ha, F for Tahltan Nation, G for Nisga'a Nation, and H for Métis and Aboriginal Groups not listed in the Section 11 Order) summarize issues raised by Aboriginal groups until March 31, 2014, and Pretivm's initial responses explaining how each issue has been considered and addressed. Responses are currently in draft form and will be updated for inclusion in the final issues tracking tables that will appended to the Information Distribution and Consultation Chapter of the Application. The responses provided in the issues tracking tables in Appendices E through H reference where in the Application more information will be available; however, numerical references to specific chapters and/or sections of the Application are likely to change. The recorded issues are based on comments to date provided at meetings with the leadership of Skii km Lax Ha, Tahltan Nation and Nisga'a Nation, including EA Working Group meetings. These tables will be updated to include additional issues, interests and concerns raised by Aboriginal groups after March 31, 2014 up until submission of the Application.

Aboriginal groups raised issues in the following general areas:

- Aboriginal (e.g., traditional foods, rights and title);
- consultation (e.g., protocols and agreements, information sharing);
- cumulative effects (e.g., study design, traffic);
- EA methodology (e.g., commercial and non-commercial use, significance ratings)
- education and training (e.g., opportunities);
- employment and economic opportunities (e.g., workforce participation);
- Nisga'a ESCIA (e.g., methodology);
- fish (e.g., salmon);
- human health (e.g., methodology, country foods);
- hydrology (e.g., glacial melt);
- Project design (e.g., waste management);
- Project roads (e.g., Brucejack Access Rd.);
- 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).

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#### 5. NEXT STEPS

Throughout the remainder of the pre-Application/pre-EIS review stage Pretivm will continue to consult with Skii km Lax Ha, Tahltan Nation and Nisga'a Nation as per the plan set out in Pretivm's *Brucejack Gold Mine: Aboriginal Consultation Plan.* Pretivm will participate in EA Working Group meetings to provide information and respond to questions and comments.

By mutual agreement, Pretivm will 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. Pretivm will continue to work with TCC and THREAT with regards to undertaking a TK/TU, or Tahltan knowledge, study for the Project. Pretivm will continue to work with NLG to complete the ESCIA and with Skii km Lax Ha to finalize the TK/TU report. Pretivm will consider suggestions from Aboriginal groups in regards to consultation and information sharing.

Following Pretivm's submission of the Application/EIS, and BC EAO's formal acceptance of the Application/EIS, a 180-day Application review period will commence. Towards the beginning of this phase the BC EAO will implement a 45-day public comment period on the Project. Coinciding with this period, Pretivm will participate in another round of open houses/community meetings hosted by the BC EAO in northwest BC in the Project vicinity.<sup>9</sup>

PRETIUM RESOURCES INC. 5-1

<sup>&</sup>lt;sup>9</sup> Pretivm will determine the locations of the open houses in discussion with BC EAO. It is anticipated that the locations will be the same as for the open houses held for the draft AIR in Gitlaxt'aamiks/New Aiyansh, Hazelton, Stewart, Dease Lake and Iskut.

#### **REFERENCES**

Definitions of the acronyms and abbreviations used in this reference list can be found in the Glossary and Abbreviations section.

- 2002. Environmental Assessment Act, RSBC. C. 43.
- 2012. Canadian Environmental Assessment Act, 2012, SC. C. 19. S. 52.
- BC EAO. 2013. Order under Section 11 of the Environmental Assessment Act S.B.C 2002, c.43.
- ERM Rescan. 2014. *Brucejack Gold Mine Project: Interim Pre-Application Aboriginal Consultation Report.*Prepared for Pretium Resources Inc. by ERM Consultants Canada Ltd.: Vancouver, BC.
- Rescan. 2013. *Brucejack Gold Mine Project: Aboriginal Consultation Plan*. Prepared for Pretium Resources Inc. by Rescan Environmental Services Ltd.: Vancouver, BC.

PRETIUM RESOURCES INC. R-1

## Appendix A

Summary of Communications with Skii km Lax Ha (until March 31, 2014)

BRUCEJACK GOLD MINE PROJECT

**Pre-Application Aboriginal Consultation Report** 

Appendix A. Summary of Communications with Skii km Lax Ha (until March 31, 2014)

Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
4/1/2011	Letter	Proposed Road Construction	Letter notifying Skii km Lax Ha that the Access Plan with Wildlife Habitat Value Assessment and Protection Plan had been completed for the proposed road from Highway 37 to the the Project. A CD containing the files and spatial data was also transmitted.	N/A
4/18/2011 1:32 PM	Email	Confirmation of Skii km Lax Ha Support of Project	Email from Chief Simpson of Skii km Lax Ha to Ministry of Mines, Energy and Natural Gas stating support for the Brucejack Gold Mine Project.	N/A
10/14/2011	Letter	Invitation to Meet	Letter from Pretivm to Skii km Lax Ha expressing appreciation for support and work of Skii km Lax Ha at Brucejack, and requesting a meeting in November to provide an update.	N/A
11/14/2011 1:00 PM	Meeting (Terrace)	Project Introduction	Pretivm gave a presentation on the Project to Skii km Lax Ha in Terrace. Discussion topics included: Project update including the exploration program, exploration road construction, the conceptual development plan, issues with personnel, traditional use, training programs and the Northwest Transmission Line.	Education/Training- Interest in training to create a skilled labour force to take advantage of employment opportunities.
1/23/2012 5:00 PM	Email	Notice of Work for Skii km Lax Ha	Pretivm attached a copy of the Notice of Work for an underground development, drilling, and bulk sample program at the Brucejack Property. Also attached the MEND Sulphurets Mine Project Report.	N/A
1/23/2012 9:28 AM	Email	Notice of Work Provided to Skii km Lax Ha	Skii km Lax Ha thanked Pretivm for the underground mine tour; Skii km Lax Ha fully supports the Project.	N/A
1/24/2012 2:00 PM	Meeting (Vancouver)	Project Update Meeting	Project update meeting in Vancouver to discuss exploration program, exploration road construction, conceptual development plan, and training programs.	N/A
2/2/2012 9:00 AM	Phone	Traditional Knowledge/Traditional Use (TK/TU) Study	Teleconference with Skii km Lax Ha to initiate a TK/TU study for the Brucejack Project.	N/A
2/10/2012 2:37 PM	Email	Skii km Lax Ha TK/TU Initiation Memo	Emailed a memo setting out suggestions to help inform Skii km Lax Ha TK/TU study for Brucejack Project, as discussed in teleconference Feb. 2, 2012. Topics discussed were TK integration in the EA, confidentiality, collection and research, and timelines.	N/A

Appendix A. Summary of Communications with Skii km Lax Ha (until March 31, 2014)

	Communication Method	Communication Subject	Communication Summary	Issues Raised*
2/23/2012	Letter and Email	Progress Letter - PEA and Technical Report Completed and on Website	Letter (mailed and emailed) from Pretivm to Skii km Lax Ha, outlining Project developments since last meeting in November 2011 such as the results of the 2011 exploration program and the completion of a preliminary economic assessment (PEA). Provided details for accessing the PEA and the Technical Report; including the transmission line along the Bowser River to Long Lake transmission line. Pretivm offered to meet with Skii km Lax Ha in their community in March or April.	N/A
8/21/2012 10:30 AM	Site Tour	Project Site Tour- Gitanyow Fisheries Authority (Skii km Lax Ha in Attendance)	Pretivm provided Gitanyow Fisheries Authority with a tour of the Project site. Helicopter departed from Gitanyow, flew up Hwy 37 and then along the access road to the camp, landing at 12:30pm. Tour of the property included the core shack and visit with Gitanyow employees. Departed at 3pm, arriving back in Gitanyow at 4pm. Skii km Lax Ha representatives working at the exploration camp also participated in the tour.	N/A
10/25/2012 11:00 AM	Meeting (Vancouver)	TK and Socio-economic Studies	Meeting to discuss the Brucejack Project Description, timelines of EA process, and TK data collection.	N/A
10/30/2012 11:28 AM	Email	TK/TU and Socio-economic Studies Collaboration	Followed up with Skii km Lax Ha to discuss initiating TK work, obtaining historical documentation, and following up with regards to socio-economic work.	N/A
11/20/2012 10:00 AM	Meeting (Vancouver)	Brucejack TK-Provision of Supporting Documents	Meeting with Skii km Lax Ha to discuss and obtain Skii km Lax Ha documents regarding their traditional territory.	N/A
11/22/2012	Informal Comment	Plowing Escape Routes for Moose on Access Rd.	While driving from Bowser to Wildlife Camp Chief Simpson recommended that Pretivm plough openings along the access road for moose to escape when snow banks are high in winter. Further, these openings should be located on corners where moose can turn more easily.	Wildlife- Plow escape openings for moose in snow banks along access road where the road curves.
12/7/2012 9:50 AM	Email	TK Follow-up	Pretivm contacted Skii km Lax Ha to see if they would be able to speak again in the near future to discuss Brucejack TK matters, or provide documents. Pretivm provided Skii km Lax Ha with updates about Project timelines and also notified that they would like to discuss Skii km Lax Ha consumption of game and fish data harvested in and around the Project for the country foods assessment.	N/A

Appendix A. Summary of Communications with Skii km Lax Ha (until March 31, 2014)

Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
1/7/2013 9:18 AM	Email	Country Foods	Pretivm expressed hope to reconnect with respect to ongoing work with Brucejack Project; in particular, concerning country food consumption to help fulfill Pretivm's obligation to estimate potential health effects. Skii km Lax Ha's input was requested to improve the accuracy of the country foods modelling exercise.	N/A
1/15/2013 1:43 PM	Email	Brucejack TK- Project Application Information Requirements (AIR) Submission	Pretivm explained that one objective of the collection of TK information from Skii km Lax Ha is to inform selection of Valued Components to be addressed in the EA, and that the AIR would be provided to Pretivm by the end of January. Pretivm requested that Skii km Lax Ha provide any other TK information prior to submission of the draft.	N/A
1/25/2013 2:00 PM	Meeting (Vancouver)	TK/TU	Skii km Lax Ha provided additional documents in support of Skii km Lax Ha claim to their traditional territory. Also discussed discrepancies in the oral history of the area, and Skii km Lax Ha genealogy, which will require further insight and research. The socio-economic baseline study research program was also discussed, including the collection of country foods data.	N/A
1/28/2013 9:25 AM	Email	Brucejack TK and Country Foods	Pretivm informed Skii km Lax Ha that they would provide a firm date as to when they would be ready to map TK sites and areas, and provided the country foods questionnaire to Skii km Lax Ha for completion.	N/A
1/31/2013 11:00 AM	Interview	TK/TU Interview	Pretivm conducted a TK interview with Skii km Lax Ha.	N/A
3/14/2013 2:37 PM	Email	Brucejack TK and Country Foods	Pretivm followed up on earlier invitation to Skii km Lax Ha to provide information on country foods consumption.	N/A
5/3/2013 11:01 AM	Email	Brucejack TK Report and Ethnographic Overview Report	Pretivm contacted Skii km Lax Ha regarding the Draft Skii km Lax Ha TK/TU Report, provided by Pretivm and based on interviews with Skii km Lax Ha and Pretivm. Pretivm acknowledged possible gaps in the report and requested direct input. Pretivm thanked Skii km Lax Ha for their collaboration to date.	N/A
6/13/2013	Meeting (Vancouver)	Trap lines and wildlife mortalities	Ten-minute discussion of information regarding trap lines and wildlife mortalities for baseline studies.	Wildlife - Increase in bear sightings near camps probably as a result of cooking odors in camp.

Appendix A. Summary of Communications with Skii km Lax Ha (until March 31, 2014)

Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
6/19/2013 10:30 AM	Site Tour		Met Nass Area Enterprises representative at Wildfire Camp at 10:30 am. Drove exploration road and discussed opportunities for Nisga'a involvement on road work.  Arrived Bowser camp at 1 pm. Nass Area Enterprises and Pretivm representatives took helicopter into Brucejack camp. Underground tour with Nass Area Enterprises representative and PVG Warwick Board member. Skii km Lax Ha site staff person also attended.	N/A
7/18/2013	Letter	Archaeological Impact Assessment Final Report- Heritage Inspection Permit 2011-0245	Pretivm provided Skii km Lax Ha with a package consisting of a cover letter, hard copy, and CD containing a digital copy of the Brucejack Gold Mine Project-Archaeological Impact Assessment Final Report-Heritage Inspection Permit 2011-0245.	N/A
7/18/2013 6:08 PM	Email	Follow-up: Brucejack and Skii km Lax Ha trapping data	Pretivm contacted Skii km Lax Ha to follow-up on an Oct. 7, 2013 email regarding the provision of trapline data. As Pretivm has committed to providing the baseline report to the Brucejack Gold Mine Project Working Group, Pretivm inquired whether Skii km Lax Ha had additional trapline info to include.	N/A
8/2/2013	Email	Draft Aboriginal Consultation Plan	Pretivm transmitted a draft Aboriginal Consultation Plan with cover letter to Skii km Lax Ha for comment.	N/A
8/7/2013	Meeting (Vancouver)	Draft Aboriginal Consultation Plan and TK/TU Report	Discussed timing of identifying the specific missing TK/TU information as well as discussing the draft Aboriginal Consultation Plan that was recently provided to Skii km Lax Ha for feedback Pretivm clarified the plan was draft only and was eager for Skii km Lax Ha's input.	N/A
8/12/2013 10:34 AM	Email	Draft Ethnographic Report	Pretivm provided Skii km Lax Ha with a draft of an ethnographic report with cover letter and invited comments.	N/A
8/21/2013 12:47 PM	Email	Skii km Lax Ha Nation comments on Draft Consultation Plan	Skii km Lax Ha provided Pretivm with comments on the draft Aboriginal Consultation Plan for the Brucejack Project (provided August 2nd).	N/A
9/3/2013 12:19 PM	Email	Brucejack Consultation Plan	Pretivm provided Skii km Lax Ha with a revised Aboriginal Consultation Plan that addresses Skii km Lax Ha comments (received August 21, 2013) on the draft plan.	N/A

Appendix A. Summary of Communications with Skii km Lax Ha (until March 31, 2014)

Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
9/4/2013 8:30 AM	Working Group Meeting (Smithers)	September 4, 2013- Working Group Meeting	The first working group meeting was held in Smithers. The goals of the meeting were to build a common understanding of the EA process and the role of the Working Group; provide an overview of the proposed Brucejack Gold Mine Project, including the transmission line along Bowser River to the Long Lake transmission line, the selected VCs and the draft AIR; to provide an overview of the Proponent's baseline study results; to determine how working group members would like to be engaged on technical project issues, and whether technical sub-working groups would be beneficial. Skii km Lax Ha representatives in attendance.	EA Methodology- Difference between commercial and non-commercial end-use as it applies to First Nations traditional land use and where in EA would the latter be considered; and EA Methodology- Where in Application will current use of lands and resources, including economic losses to Aboriginal groups, be captured.
9/5/2013	Site Tour	Brucejack September 5, 2013 Site Tour	Pretivm flew Working Group participants from Smithers to Bob Quinn and then helicoptered participants into the Project site. Participants toured the property including the core shack. Skii km Lax Ha representatives attended.	N/A
9/23/2013 2:00 PM	Meeting (Vancouver)	Meeting to discuss Skii km Lax Ha comments on dAIR	Pretivm and Pretivm met with BC EAO, CEA Agency and Skii km Lax Ha to discuss Skii km Lax Ha's comments on the dAIR.	Aboriginal- A specific chapter or sub-chapter for Skii km Lax Ha required to adequately address Skii km Lax Ha interests, including downstream of the biophysical assessment area;  Aboriginal- Draft AIR does not clearly lay out how the Skii km Lax Ha will be engaged to help interpret the impact on use of land and impact to rights;  Aboriginal- Interested in discussing proposed mitigations with the proponent;  EA Methodology- Interested in discussing the definitions of the significance ratings;  EA Methodology- Rationale for excluding an assessment of exploration road construction;  Traditional Knowledge/Use- Confidentiality concerns related to sensitive information in TK/TU Study; and Wildlife- Observed impacts to bear and marten during the summer as a result of (unspecified) Project activity.
9/24/2013 4:09 PM	Email	Brucejack Camp Burn Permit	Pretivm advised they had a provincial burn number for Brucejack Camp for outdoor burning of scrap wood and that they were required to obtain an Air Discharge Permit or Approval to burn scrap wood at Brucejack. Pretivm inquired whether Skii km Lax Ha had any concerns with burning scrap wood in a burn pit at Brucejack Camp.	N/A

Appendix A. Summary of Communications with Skii km Lax Ha (until March 31, 2014)

	mmunication Method	Communication Subject	Communication Summary	Issues Raised*
9/24/2013 4:58 PM	Email	Brucejack Camp Burn Permit	Skii km Lax Ha stated a preference for burning waste wood at Brucejack Camp rather than hauling it a 100 km and then burning it.	Project Design- Preference for burning waste wood at Brucejack site.
10/7/2013 3:59 PM	Email	Follow-up: Brucejack and Skii km Lax Ha Trapping Data	Pretivm followed up with Skii km Lax Ha to inquire about the availability of information about traplines near the proposed Project area. Skii km Lax Ha had noted in the Sept. 23 meeting that this information was being compiled.	N/A
10/16/2013 10:27 AM	Email	Brucejack Creek Proposed Bridge- Inquiry re. Navigability or Environmental Concerns	Pretivm informed Skii km Lax Ha of interest in building a bridge across Brucejack Creek to connect with road on the north side of the creek. Pretivm inquired whether Skii km Lax Ha have any concerns regarding the proposed bridge, either environmentally or for navigability. Pretivm attached the site plans with photos of the proposed crossing.	N/A
10/21/2013 4:44 PM	Email	Use of Navigable Waters in the Brucejack Project Area	Pretivm contacted Skii km Lax Ha to understand possible Project effects to navigation. Pretivm requested permission to use navigation-related information previously shared for the KSM Project for the purposes of understanding uses of navigable waters for the Brucejack Project. Pretivm asked follow-up questions regarding navigation of waterbodies, and provided Skii km Lax Ha opportunity to add information about the use of waterbodies.	N/A
11/4/2013 9:00 AM	Email	Use of Navigable Waters in the Brucejack Project Area	Pretivm followed up on unanswered October 21, 2013 email to Skii km Lax Ha regarding the use of navigable waters in the Brucejack Project area.	N/A
11/4/2013 9:19 AM	Email	Use of Navigable Waters in the Brucejack Project Area	Skii km Lax Ha informed Pretivm that they had additional info about navigable waters that would be provided to Pretivm the following day (Nov. 5, 2013).	N/A
11/11/2013 7:47 PM	Email	Brucejack Creek Proposed Bridge	Skii km Lax Ha informed Pretivm that they do not have direct concerns with construction of the proposed bridge over Brucejack Creek. While mountain goats likely traverse the area, so long as no obvious wildlife trails of creek crossings are unimpeded, there is no concern.	N/A
11/14/2013 4:12 PM	Email	Brucejack Open House, Nov. 27, Hazelton	Pretivm notified Skii km Lax Ha that flyers and posters advertising the Open House on the Brucejack Project in Hazelton had been shipped to Hazelton for Chief Simpson to pick up. Chief Simpson had requested these materials from Pretivm for distributing to community members.	N/A
11/18/2013 3:54 PM	Email	Brucejack Open House, Nov. 27, Hazelton	Pretivm advised Skii km Lax Ha that a package containing the requested community information materials (notification posters re. the upcoming Open House in Hazelton and fliers for door to door distribution) was available for pick-up.	N/A

Appendix A. Summary of Communications with Skii km Lax Ha (until March 31, 2014)

Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited Skii km Lax Ha representatives to public open houses, held from Nov. 25-28, 2013.	N/A
11/22/2013 8:40 AM	Email	Use of Navigable Waters in the Brucejack Project Area	Pretivm followed up with Skii km Lax Ha about status of additional information about navigable waters in Brucejack Project area. Pretivm had not received the information, and inquired whether it would be sent soon.	N/A
11/22/2013 9:13 AM	Email	Use of Navigable Waters in the Brucejack Project Area	Skii km Lax Ha informed Pretivm that an internal meeting had taken place about navigable waters in the Brucejack Project area, and notes would be finalized shortly.	N/A
12/12/2013 9:49 AM	Email	Use of Navigable Waters in the Brucejack Project Area	Pretivm inquired about status of notes regarding navigable waters use in Brucejack Project area. Skii km Lax Ha had stated on Nov. 22, 2013 that notes were available and would be shared.	N/A
12/16/2013 4:00 PM	Email		Pretivm provided Skii km Lax Ha with a draft Aboriginal Consultation Report for review and comment (comments requested by Jan. 3, 2014).	N/A
1/16/2014 11:30 AM	Phone	Draft Aboriginal Consultation Report	Pretivm left a message with Skii km Lax Ha inquiring about their comments on the draft Aboriginal Consultation Report	N/A
1/20/2014 10:33 AM	Email	Brucejack Project Consultation Report Draft	Skii km Lax Ha provided comments on the Draft Aboriginal Consultation report. In one of their comments Skii km Lax Ha provided clarification on an earlier comment they made on November 11, 2013. Skii km Lax Ha noted that with regards to the bridge crossing over Brucejack Creek it is more accurate to state that "Skii km Lax Ha noted that, as long as no obvious wildlife trails or creek crossings are being impeded, they saw no direct issues with the bridge crossing."	N/A
1/24/2014 5:19 PM	Email	Brucejack - Current Use of Lands and Resources for Traditional Purposes	Pretivm provided Skii km Lax Ha with a new section of the Brucejack Application Information Requirements that speaks to an assessment of effects to current land use and resources for traditional purposes. This section is in partial response to comments received from Skii km Lax Ha during the Working Group review of the AIR.	N/A
1/28/2014 10:20 AM	Phone	Skii km Lax Ha Lodge	Meeting to discuss Skii km Lax Ha Lodge next to the Bowser Camps and Brucejack Access Road, in close proximity to the Bowser Aerodrome. Discussed possible strategies to reduce noise levels and air pollution at the lodge if human health concerns are identified at the lodge due to noise and air quality.	N/A

Appendix A. Summary of Communications with Skii km Lax Ha (until March 31, 2014)

Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
1/29/2014 10:04 AM	Email	Response to Skii km Lax Ha comments on draft Aboriginal Consultation Report	Pretivm provided a letter to Skii km Lax Ha responding to comments received on the draft Interim Pre-Application Aboriginal Consultation Report.	N/A
2/6/2014 9:43 AM	Email	Current Use of Lands and Resources for Traditional Purposes	Pretivm provided Skii km Lax Ha with a new section of the Brucejack Application Information Requirements that speaks to an assessment of effects to current use of land and resources for traditional purposes.	N/A
2/11/2014 7:32 AM	Email	Skii km Lax Ha Navigation- Info Provided	Skii km Lax Ha provided requested information about navigation of waterbodies in the study area. Skii km Lax Ha used to travel from Stewart over ridge-tops and glaciers and navigation over small waterways such as Brucejack Creek and Lake. Skii km Lax Ha have used Bowser Lake, the upper Bowser River, and several tributaries during hunting trips.	N/A
2/14/2014 2:46 PM	Email	Brucejack Project Interim Pre- Application Aboriginal Consultation Report	Pretivm provided Skii km Lax Ha with a cover letter and the Brucejack Project Interim Pre-Application Aboriginal Consultation Report, which Pretivm revised following Skii km Lax Ha and NLG comments on a draft. This final version would be submitted to BC EAO and a subsequent Pre-Application Aboriginal Consultation Report would be circulated to Skii km Lax Ha for comment prior to submission of the Application for an EA/EIS.	N/A
2/21/2014	Meeting (Vancouver)	Project Plans	Pretivm provided an update on Project plans; discussion ensued.	N/A
3/3/2014 8:40AM	Phone	Navigability Survey	Phone call from Skii km Lax Ha to clarify information previously provided in the navigable waters survey. Skii km Lax Ha noted that when Brucejack Lake and Creek were frozen over they would have been crossed over in the winter time while journeying overland between Bowser Lake and the coast. However, no boats or canoes were used on these waterways.	N/A
3/27/2014 4:11PM	Email	Brucejack Study Areas	Pretivm provided Skii km Lax Ha with KMZ files of the Brucejack Project study areas as per request.	N/A

<sup>\*</sup>NOTE: Draft responses to these issues are included in the issues tracking table in Appendix E.

## Appendix B

Summary of Communications with Tahltan Nation (until March 31, 2014)

BRUCEJACK GOLD MINE PROJECT

**Pre-Application Aboriginal Consultation Report** 

Appendix B. Summary of Communications with Tahltan Nation (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
	l Council (TCC) 11/23/2011 2:00 PM	Meeting (Vancouver)	Project Introduction Meeting	Pretivm. Pretivm provided a presentation on the Project. Discussion ensued about Tahltan Nation Development Corporation (TNDC) and TCC concerns, as well as TCC revenue/employment opportunities.	Cumulative Effects- Eight new mines proposed in Tahltan territory; Traffic- Concern about number of trucks and traffic on Highway 37 from a safety perspective; and Traffic- Concern about number of trucks and traffic on Highway 37 from a wildlife perspective.
	10/25/2012 3:00 PM	Meeting (Vancouver)	Project Update Meeting	Pretivm provided an update on the Project Description to the TCC and the TNDC. Initial discussion centred on why TNDC was not working on the Project, followed by a presentation/discussion of work for the coming year. TNDC interested in road work.	N/A
	7/18/2013	Letter	Assessment Final Report-	Pretivm provided Tahltan with a package consisting of a cover letter, hard copy, and CD containing a digital copy of the Brucejack Gold Mine Project- Archaeological Impact Assessment Final Report- Heritage Inspection Permit 2011-0245.	N/A
	8/8/2013	Letter	Draft Aboriginal Consultation Plan	Pretivm mailed a copy of the draft Aboriginal Consultation Plan and a cover letter to TCC for comment.	N/A
	8/8/2013	Letter	Draft Aboriginal Consultation Plan	Pretivm sent by post originals of correspondence letter and draft Aboriginal Consultation Plan to TCC and THREAT.	N/A
	8/8/2013 2:23 PM	Email	Draft Aboriginal Consultation Plan	Pretivm provided the TCC with a copy of the draft Aboriginal Consultation Plan and two letters regarding the Brucejack Consultation Plan. The letter and plan were also mailed earlier that day.	N/A
	8/12/2013 10:38 AM	Email	Draft Ethnographic Report	Pretivm provided the TCC and THREAT with a draft ethnographic report and cover letter and invited comments.	N/A

Appendix B. Summary of Communications with Tahltan Nation (until March 31, 2014)

Aboriginal Group Name Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*	
Tahltan Central Council (TCC) (cont'd)					
9/4/2013 8:30 AM	Working Group Meeting (Smithers)	September 4, 2013- Working Group Meeting	Working Group; provide an overview of the proposed Brucejack Gold Mine Project, including the	design of the cumulative effects study; Project Roads- Brucejack Access Road should be	
12/16/2013 1:17 PM	Email	Draft Interim Pre- Application Aboriginal Consultation Report	Pretivm provided TCC with a draft Aboriginal Consultation Report for review and comment (comments requested by Jan. 3, 2014). The report was also provided to THREAT.	N/A	
11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited stakeholders to public open houses, held from Nov. 25-28, 2013.	N/A	
2/14/2014 2:34 PM	Email	Interim Pre-Application Aboriginal Consultation Report	Pretivm provided the TCC and THREAT with a cover letter and the Brucejack Project Interim Pre-Application Aboriginal Consultation Report, which Pretivm had previously circulated to TCC/THREAT for comment (comments pending). This final version would be submitted to BC EAO and a subsequent Pre-Application Aboriginal Consultation Report would be circulated to TCC for comment prior to submission of the Application for an EA/EIS.	N/A	
Tahltan Nation Development Corporation (TNDC)					
5/15/2012 2:00 PM	Meeting (Vancouver)	Project Update Meeting	Pretivm provided an update on exploration road and project construction to the TNDC in Vancouver. Discussion involved TNDC capabilities and opportunities for TNDC. TNDC interested in road work.	N/A	
5/24/2012	Meeting (Burns Lake)	Project Update Meeting	Pretivm provided an update on exploration road and project construction to the TNDC at Minerals North in Burns Lake. Discussion focused on opportunities for TNDC at Brucejack. TNDC interested in road work.	N/A	

Appendix B. Summary of Communications with Tahltan Nation (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Tahltan Nation	Development Corporation	on (TNDC) (cont'd)			
	6/11/2012 3:00 PM	Meeting (Vancouver)	Project Update Meeting	Pretivm provided an update on exploration road construction to the TNDC at Pretivm's office in Vancouver in the afternoon. Topics included opportunities for road work.	N/A
	10/25/2012 3:00 PM	Meeting (Vancouver)	Project Update Meeting	Pretivm provided an update on the Project Description to the TCC and the TNDC at Pretivm office in Vancouver. Initial discussion centred on why TNDC was not working on the Project, followed by a presentation/discussion of work for the coming year. TNDC interested in road work.	N/A
	1/27/2014	Meeting (Vancouver)	Update on Potential Work for TNDC	Discussion of future construction work for TNDC. TNDC will have an opportunity to perform work on the Wildfire hill stabilization if required as well as bid on any additional construction work upcoming in 2015. Pretivm noted that no significant construction work will be performed in 2014. Matrix introduced itself as suppliers of helicopter, logistics and camp services.	N/A
	3/11/2014 11:00 AM	Meeting (Vancouver)	Potential Contracting Opportunities	Discussion of proposed joint venture between TNDC and Nass Area Enterprises (NAE) and work they could do on the Project in the short term and long term. NAE repesentatives also in attendance.	Employment/Economic Opportunities- General Interest.
	3/24/2014 12:00 AM	Meeting (Vancouver)	2014 Work Plans	Discussion of 2014 work plans.	N/A
THREAT (Tahl	ltan Heritage Resources E	nvironmental Asses	ssment Team)		
•	7/18/2013	Letter	Archaeological Impact Assessment Final Report-	Pretivm provided THREAT with a package consisting of a cover letter, hard copy, and CD containing a digital copy of the Brucejack Gold Mine Project-Archaeological Impact Assessment Final Report-Heritage Inspection Permit 2011-0245.	N/A
	8/8/2013	Phone	Draft Aboriginal Consultation Plan	Pretivm phoned THREAT to inquire whether draft Consultation Plan (previously emailed) had been received. THREAT returned phone call to say they had not received email.	N/A
	8/8/2013	Letter	Draft Aboriginal Consultation Plan	Pretivm sent by post originals of correspondence letter and draft Consultation Plan to TCC and THREAT.	N/A

Appendix B. Summary of Communications with Tahltan Nation (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
THREAT (Tahl	tan Heritage Resources I	Environmental Asses	ssment Team) (cont'd)		
	8/8/2013 2:17 PM	Email	Draft Aboriginal Consultation Plan	Pretivm provided THREAT with the draft Aboriginal Consultation Plan and two copies (Aug. 2, 2013 and Aug. 8, 2013) of a cover letter regarding the Brucejack Consultation Plan that had also been sent to TCC.	N/A
	8/12/2013 10:38 AM	Email	Draft Ethnographic Report	Pretivm provided the TCC and THREAT with a draft ethnographic report and cover letter and invited comments.	N/A
	9/3/2013	Phone	Tahltan review of Consultation Plan, site visit, and EA agreement	Pretivm phoned THREAT to request status of Tahltan review of the Aboriginal Consultation Plan. THREAT expects to submit comments to BC EAO by the end of the week (end of Sept. 6) on the Plan. THREAT will be attending working group meetings. THREAT will contact Pretivm to discuss setting up an EA Agreement between Tahltan and Pretivm, as the \$5K of existing funding from government is insufficient to cover costs of Tahltan participation in the EA review.	N/A
	10/21/2013 11:29 AM	Email	O	Pretivm sent THREAT a short questionnaire regarding navigability of waters in the Brucejack Project area.	N/A
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited stakeholders to public open houses, held from Nov. 25-28, 2013.	N/A
	12/16/2013 1:22 PM	Email	Draft Interim Pre-Application Aboriginal Consultation Report	Pretivm provided THREAT with a draft Aboriginal Consultation Report for review and comment (comments requested by Jan. 3, 2014). The report was also provided to TCC.	N/A
	1/16/2014 10:21 AM	Email	Draft Interim Pre-Application Aboriginal Consultation Report	Pretivm contacted THREAT to inquire about status of THREAT's comments on the draft Aboriginal Consultation Report, and whether more time was required.	N/A
	1/16/2014 12:07 PM	Email	Draft Interim Pre-Application Aboriginal Consultation Report	THREAT notified Pretivm that they required more time to review Draft Aboriginal Consultation Report.	N/A
	1/16/2014 12:10 PM	Email	Draft Interim Pre-Application Aboriginal Consultation Report	Pretivm thanked THREAT for their email, and informed them that they would notify the BC EAO that THREAT needed more time to review Draft Aboriginal Consultation Report.	N/A

#### Appendix B. Summary of Communications with Tahltan Nation (until March 31, 2014)

Aboriginal		Communication				
Group Name	Communication Date	Method	Communication Subject	Communication Summary	Issues Raised*	
THREAT (Tahltan Heritage Resources Environmental Assessment Team) (cont'd)						
	2/14/2014 2:34 PM	Email	Brucejack Project Interim	Pretivm provided the TCC and THREAT with a cover	N/A	
			Pre-Application Aboriginal	letter and the Brucejack Project Interim Pre-		
			Consultation Report	Application Aboriginal Consultation Report, which		
				Pretivm had previously circulated to TCC/THREAT		
				for comment (comments pending). This final version		
				would be submitted to BC EAO and a subsequent Pre-		
				Application Aboriginal Consultation Report would be		
				circulated to TCC for comment prior to submission of		
				the Application for an EA/EIS.		

<sup>\*</sup>NOTE: Draft responses to these issues are included in the issues tracking table in Appendix E.

## Appendix C

Summary of Communications with Nisga'a Nation (until March 31, 2014)

BRUCEJACK GOLD MINE PROJECT

**Pre-Application Aboriginal Consultation Report** 

Appendix C. Summary of Communications with Nisga'a Nation (until March 31, 2014)

Aboriginal		Communication	Communication Collins		T 19.1 19
Group Name	Communication Date ge Government (Kincolith	Method	Communication Subject	Communication Summary	Issues Raised*
Gingoix villaș	11/19/2013 5:38 PM	Email	Community Notification for Open House	Pretivm requested assistance from the Gingolx Village Government in promoting the New Aiyansh open house, and provided a promotional poster for distribution.	N/A
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited representatives of Gingolx Village Government to public open houses, held from Nov. 25-28, 2013.	N/A
Gitlaxt'aamiks	s Village Government (Ne	w Aiyansh)			
	4/1/2011	Letter	Information package mailed to Nisga'a	Mailed copies of exploration road Access Plan with Wildlife Habitat Value Assessment and Protection Plan, preliminary designs for Bell Irving and Wildfire Bridges, and spatial data (shape files) sent as per request from NLG.	N/A
	11/19/2013 5:28 PM	Email	Community Notification for Open House	Pretivm inquired whether Gitlaxt'aamiks Village Government would be able to help promote the Nov. 25, 2013 open house in Gitlaxt'aamiks, and provided a poster for distribution.	N/A
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited representatives of Gitlaxt'aamiks Village Government to public open houses, held from Nov. 25-28, 2013.	N/A
	11/20/2013 3:45 PM	Email	Community Notification for Brucejack Gold Mine Open House	Pretivm provided Gitlaxt'aamiks Village Government with poster promoting Gitlaxt'aamiks open house.	N/A
	11/20/2013 4:58 PM	Email	Community Notification for Brucejack Gold Mine Open House	Gitlaxt'aamiks Village Government confirmed that notice promoting open house had been sent to community members.	N/A
	1/22/2014 10:00 AM	Interview (Gitlaxt'aamiks)	ESCIA Interview Gitlaxt'aamiks	ESCIA interview held in the council chambers of the Gitlaxt'aamiks Village Government from 10am to about 3:30pm.	Consultation- Concern about low level of attendance by Nisga'a at the Nov. 25, 2013 Open House in New Aiyansh; Employment/Economic Opportunities- General Interest; Employment/Economic Opportunities- Select the union for contracting so Nisga'a Villages can start speaking with them proactively; and Wildlife - General Interest.
Gitwinksihlkv	w Village Government (Ca 11/19/2013 5:34 PM	<b>anyon City)</b> Email	Community Notification for Open House	Pretivm requested assistance from the Gitwinksihlkw Village Government for promoting the open house, and provided a poster for distribution.	N/A

Appendix C. Summary of Communications with Nisga'a Nation (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Gitwinksihlk	w Village Government (C 11/20/2013 2:46 PM	Canyon City) (cont'd) Email	Invitation to an Open	Pretivm invited representatives of Gitwinksihlkw	N/A
	11/ 20/ 2013 2.40 1 101	Eman	House on the Brucejack Gold Mine Project	Village Government to public open houses, held from Nov. 25-28, 2013.	Ny X
Laxgalts'ap Vi	llage Government (Greei	nville)			
	11/19/2013 5:36 PM	Email	Community Notification for Open House	Pretivm inquired whether the Laxgalts'ap Village Government would be able to assist promoting the open house in New Aiyansh, and provided a promotional poster for distribution.	N/A
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited representatives of Laxgalts'ap Village Government to public open houses, held from Nov. 25-28, 2013.	N/A
	1/23/2014 1:00 PM	Interview (Laxgalts'ap)	ESCIA Interview- Laxgalts'ap Village Government	Interview from 1pm to 3pm with Laxgalts'ap Village Government.	N/A
Nass Area Ent	erprises (NAE)				
	3/15/2013 9:30 AM	Meeting (Vancouver)	Project Update Meeting with NAE	Pretivm provided a presentation on the Project followed by a discussion about opportunities for NAE to get involved in Brucejack Project.	N/A
	5/30/2013 10:00 AM	Meeting	Project Update Meeting with NAE	Discussion focused on project updates and work opportunities. Arranged a site visit for week of June 17, 2013. Discussed potential opportunities for NAE.	N/A
	6/12/2013	Meeting (Vancouver)	Project Update Meeting with NAE	Meeting to discuss work opportunities for NAE on exploration road and a site visit for June 18, 2013.	N/A
	6/19/2013 10:30 AM	Site Tour	Brucejack Site Visit -NAE	Met NAE representative at Wildfire Camp at 10:30 am. Drove exploration road and discussed opportunities for Nisga'a involvement on road work. Arrived Bowser camp at 1 pm. NAE and Pretivm representatives took helicopter into Brucejack camp. Underground tour with NAE representative and PVG Warwick Board member.	N/A
	3/11/2014 11:00 AM	Meeting (Vancouver)	Potential Contracting Opportunities	Discussion of proposed joint venture between NAE E and Tahltan Nation Development Corporation (TNDC) Ir and work they could do on the Project in the short term and long term. TNDC representatives also in attendance.	mployment/Economic Opportunities- General nterest.

Appendix C. Summary of Communications with Nisga'a Nation (until March 31, 2014)

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Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Nisga'a Lisims	Government (NLG) 2/4/2011	Letter	Mineral Exploration Program and Proposed Road	Letter from Pretivm informing NLG that Pretivm has purchased the mineral claims that comprise the Bowser Property from Silver Standards Resources. Pretivm indicated their plan to continue the Wildlife Habitat Value Assessment and Protection Plan studies begun by Silver Standard. Pretivm plans to continue the agreement with the Skii km Lax Ha, who assist in documenting archaeological sites.	N/A
	4/1/2011	Letter	Proposed Road Construction	Letter notifying NLG that the Access Plan with Wildlife Habitat Value Assessment and Protection Plan had been completed for the proposed road from Highway 37 to the the Project. A CD containing the files and spatial data was also transmitted.	N/A
	11/8/2011 10:00 AM	Meeting (Vancouver)	Consultation Meeting	Formal presentation by Pretivm followed by questions from NLG resulting in discussion about Pretivm's relationship to Seabridge Gold, concerns about tailings management, Pretivm's intention with regards to the Snowfield property, environmental concerns, NFA, communication policy, Nisga'a involvement in the Project.	formal Nisga'a communications protocol;
	4/4/2012 1:30 PM	Meeting (Vancouver)	Consultation Meeting	After formal presentation, discussion between NLG and Pretivm regarding project timelines, locations, review and consultation process, NFA, employment opportunities.	N/A
	11/30/2012 9:30 AM	Meeting (Vancouver)	Update Meeting	Meeting between NLG and Pretivm, including presentation of Project. Following presentation NLG and Pretivm discussed consultation and communications protocol, EA process, possible meeting in New Aiyansh in January. NLG encouraged Pretivm to provide all baseline material to NLG directly. NLG's consultants, LGL, would be interested in participating in a site tour.	Consultation- Establishment of, and adherence to, a formal Nisga'a communications protocol; and Consultation- Pretivm to provide baseline material to NLG directly (not via provincial and federal governments).

Appendix C. Summary of Communications with Nisga'a Nation (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Nisga'a Lisims	Government (NLG) (con	t'd)			
	2/19/2013 9:30 AM	Meeting (Gitlaxt'aamiks)	Project Update Meeting- Nisga'a Executive	Pretivm presented company update, followed by discussion on EA process, capacity funding to allow participation in EA process, benefits agreement negotiation (EA process and benefits agreement negotiations would run in parallel). Paragraph 8(i) of the NFA requires Assessor to take into account any agreement between NLG and proponent, need for a non-disclosure agreement.	N/A
	3/11/2013	Email	NDA provided to Nisga'a	Pretivm forwarded draft non-disclosure agreement to NLG for review.	N/A
	7/18/2013	Letter	Assessment Final Report-	Pretivm provided NLG with a package consisting of a cover letter, hard copy, and CD containing a digital copy of the Brucejack Gold Mine Project-Archaeological Impact Assessment Final Report-Heritage Inspection Permit 2011-0245.	N/A
	8/28/2013 11:47 AM	Email	Brucejack Gold Mine Consultation Plan	Pretivm contacted NLG to inquire about progress on the review and consideration of the previously sent Draft Aboriginal Consultation Plan. Pretivm inquired whether NLG would be commenting on the draft plan before September 3, 2013, or whether Pretivm should inform the EAO that the NLG require more time to prepare a response.	N/A
	9/3/2013 2:48 PM	Email	Brucejack Project ESCIA Report	Pretivm provided NLG with a letter outlining plans for the ESCIA pursuant to Chapter 10, paragraph 8(f) of the Nisga'a Final Agreement. The letter was a follow up to a scope of work proposed on April 29th, 2013. Pretivm advised NLG that its consultant would be starting work immediately in accordance with the work plan, including re-analyzing previously collected socio-economic data. Pretivm requested permission for its consultant to approach NLG and village governments for potential interviews, meetings or other forms of communication.	N/A

Appendix C. Summary of Communications with Nisga'a Nation (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Nisga'a Lisims	Government (NLG) (con 9/4/2013 8:30 AM	nt'd) Working Group Meeting (Smithers)	September 4, 2013- Working Group Meeting	The first working group meeting was held in Smithers. The goals of the meeting were to build a common understanding of the EA process and the role of the Working Group; provide an overview of the proposed Brucejack Gold Mine Project, including the transmission line along Bowser River to the Long Lake transmission line, the selected VCs and the draft AIR; to provide an overview of the Proponent's baseline study results; to determine how working group members would like to be engaged on technical project issues, and whether technical sub-working groups would be beneficial. NLG representatives in attendance.	harvesting- present and future) is an impact to treaty rights regardless of consumption; Fish- A water quality incident could affect Sockeye Salmon in Bowser Lake; Human Health- Consider a food web study in Nass area to ensure impacts are captured; Hydrology- Potential impacts on the Knipple Glacier and the watershed due to glacial melt and vehicle
	10/11/2013 11:00 AM	Phone	ESCIA interviews setup	Teleconference to discuss the Economic, Social, and Cultural Impact Assessment (ESCIA) report being carried out in accordance with Chap 10, para. 8(f) of the Nisga'a Final Agreement (NFA). Discussed scope of work, method, need for and focus of interviews to fill gaps and update socio-economic settings info.	ESCIA- Interest in case studies that discuss Aboriginal experiences with mining in BC; and ESCIA- Interest in cumulative incremental effects and associated mitigation and management measures.
	10/21/2013 11:29 AM	Email	O	Pretivm sent NLG a short questionnaire regarding navigability of waters in the Brucejack Project area.	N/A
	10/22/2013 2:15 PM	Email	Brucejack Project ESCIA	Pretivm requested NLG assistance in identifying potential interview candidates for ESCIA research, and provided a memo and outline of the proposed questions. The research program would focus on the following areas: housing and community infrastructure, education services and facilities, emergency services, and social and health services.	N/A
	11/1/2013	Phone	ESCIA interviews setup	Pretivm left voicemail messages with each individual to follow up on letter and memo sent mid-October requesting list of possible interviewees and contact details. Memo included list of potential interview questions for NLG consideration and feedback.	N/A

Appendix C. Summary of Communications with Nisga'a Nation (until March 31, 2014)

Aboriginal		Communication			
Group Name	Communication Date	Method	Communication Subject	Communication Summary	Issues Raised*
Nisga'a Lisims	Government (NLG) (cont	t'd)			
	11/1/2013	Phone	ESCIA interviews setup	Teleconference to discuss and exchange questions with respect to the research and delivery of the Brucejack Economic, Social, and Cultural Impact Assessment report being carried out in accordance with Chap 10, para. 8(f) of the NFA. Discussed scope of work, method, need for and focus of interviews to fill gaps and update socio-economic settings info.	N/A
	11/1/2013 10:00 AM	Phone	ESCIA interviews setup	Pretivm left voicemail messages with NLG to follow up on letter and memo sent mid-October requesting list of possible interviewees and contact details. Memo included list of potential interview questions for NLG consideration and feedback.	N/A
	11/8/2013 10:00 AM	Phone	ESCIA interviews setup	Pretivm left voicemail messages with NLG to follow up on letter and memo sent mid-October requesting list of possible interviewees and contact details. Memo included list of potential interview questions for NLG consideration and feedback.	N/A
	11/13/2013	Phone	ESCIA interviews setup	Phone call to discuss and identify potential key informant interviewees per ESCIA scope of work.	N/A
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited representatives of NLG to public open houses, held from Nov. 25-28, 2013.	N/A
	11/20/2013 4:47 PM	Email	Brucejack Gold Mine Project Open House- Gitlaxt'aamiks- Nov. 25	Pretivm contacted NLG to request assistance promoting the Gitlaxt'aamiks open house, and provided a promotional poster for distribution.	N/A

Appendix C. Summary of Communications with Nisga'a Nation (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Nisga'a Lisims	Government (NLG) (cont 11/25/2013 4:30 PM	Open House (Gitlaxt'aamiks)	Gitlaxt'aamiks/New Aiyansh DAIR Open House	One of five open houses in northwest BC hosted by BC EAO and attended by Pretivm. Pretivm displayed nine posters describing the Project and baseline studies being conducted for the EA. BC EAO displayed two posters describing the EA process and opportunities for public comment. Pretivm provided a formal dinner in Gitlaxt'aamiks. Approximately 40 people attended. A question and answer period took place following the dinner. Pretivm also displayed an 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, and provided feedback forms and an anonymous box for the public to comment on the Project and evaluate the open house format.	project to the Nass River and Nass Area (general public); Accidents & Malfunctions- Accidental spills of hazardous materials on the Brucejack Access Rd. and resulting environmental contamination (general public); Consultation- Better outreach required to notify more Nisga'a citizens about community meetings and

Appendix C. Summary of Communications with Nisga'a Nation (until March 31, 2014)

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Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Nisga'a Lisims	Government (NLG) (cont' 12/16/2013 12:54 PM	d) Email	Draft Interim Pre- Application Aboriginal Consultation Report	Pretivm provided NLG with a draft Aboriginal Consultation Report for review and comment (comments requested by Jan. 3, 2014).	N/A
	1/16/2014 11:45 AM	Email	Draft Aboriginal Consultation Report	Pretivm contacted NLG legal counsel to inquire about the status of NLG's potential comments on the draft Aboriginal Consultation Report, and whether more time was required.	N/A
	1/16/2014 1:47 PM	Email	Draft Aboriginal Consultation Report	Pretivm thanked NLG for email, and notified that they would inform the BC EAO that NLG required more time to review Draft Aboriginal Consultation Report.	N/A
	1/20/2014 12:51 PM	Email	Brucejack interviews	Pretivm inquired about an NLG representative's availability for a meeting.	N/A
	2/5/2014	Meeting (Vancouver)	PVG Update	Pretivm provided an update on the Project.	N/A
	2/11/2014 11:45 AM	Email	Nisga'a ESCIA Raw Date, etc.	Pretivm contacted NLG to request raw data from prior ESCIA interviews be sent to Pretivm, along with the one comment on the draft Aboriginal Consultation Report. Pretivm also inquired about non-confidential information that NLG wished to share with Pretivm.	N/A
	2/11/2014 5:58 PM	Email	Nisga'a ESCIA Raw Date; Comment on Draft Aboriginal Consultation Report	NLG provided Pretivm with previous KSM reporting related to Nisga'a interests (Statistical Report, Focus Group Report, and Business Survey Statistical Report). NLG also provided one comment based on their review of the Draft Interim Pre-Application Aboriginal Consultation Report.	N/A
	2/14/2014 2:37 PM	Email	, ,	Pretivm provided NLG with a cover letter and the Brucejack Project Interim Pre-Application Aboriginal Consultation Report, which Pretivm revised following NLG and Skii km Lax Ha comments on a draft. This final version would be submitted to BC EAO and a subsequent Pre-Application Aboriginal Consultation Report would be circulated to NLG for comment prior to submission of the Application for an EA/EIS.	N/A
	2/25/2014 9:09 AM	Email	Information Request	NLG informed Pretivm that they had forwarded Pretivm's request for statistical information on make- up of Nisga'a villages to someone else within NLG.	N/A

Appendix C. Summary of Communications with Nisga'a Nation (until March 31, 2014)

Aboriginal		Communication			
Group Name	Communication Date	Method	Communication Subject	Communication Summary	Issues Raised*
Nisga'a Lisims	Government (NLG) (con	t'd)			
	2/25/2014 11:41 AM	Email	Brucejack - Water Quality Sampling below the Knipple Glacier	Pretivm responded to an issue raised by NLG at the September 4th Working Group meeting regarding baseline water quality data collection from the outflow of Knipple Glacier. Pretivm provided a letter detailing work conducted at that location in response to NLG's interest in samples from that location.	N/A
	3/24/2014 10:51AM	Email	Additional Baseline Information	Responding to earlier inquiries by Pretivm, NLG provided access information for reports related to fish and fish habitat that may overlap with the Brucejack Project area.	N/A
Wilp Wilxl'lsk	whl Nisga'a Institute				
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited stakeholders to public open houses, held from Nov. 25-28, 2013.	N/A

<sup>\*</sup>NOTE: Draft responses to these issues are included in the issues tracking table in Appendix G.

### Appendix D

Summary of Communications with Métis and Non-Section 11 Order Aboriginal Groups (until March 31, 2014)

BRUCEJACK GOLD MINE PROJECT

**Pre-Application Aboriginal Consultation Report** 

Appendix D. Summary of Communications with Métis and Non-Section 11 Order Aboriginal Groups (until March 31, 2014)

Aboriginal		Communication			
Group Name	Communication Date	Method	Communication Subject	Communication Summary	Issues Raised*
British Colum	bia Aboriginal Mine Trai 11/20/2013 2:46 PM	ining Association Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited stakeholders to public open houses, held from Nov. 25-28, 2013.	N/A
Gitanmaax Bar	nd Council				
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited stakeholders to public open houses, held from Nov. 25-28, 2013.	N/A
Gitanyow Ban	d Council				
	7/18/2013	Letter		Pretivm provided Gitanyow Band Council (care of Gitanyow Hereditary Chiefs-GHC) with a package consisting of a cover letter, hard copy, and CD containing a digital copy of the Brucejack Gold Mine Project-Archaeological Impact Assessment Final Report-Heritage Inspection Permit 2011-0245.	N/A
Gitanyow Fish	neries Authority (GFA)				
	3/28/2012 10:30 AM	Meeting (Gitanyow)	Update Meeting	Update meeting with presentation by Pretivm and follow-up discussion. Gitanyow suggested there be a funding agreement to support meetings, requested quarterly meetings, would like a Communications Protocol with Pretivm, expressed concerns over truck traffic on Hwy. 37, and asked for a meeting prior to the submission of the Project Description. They asked for Pretivm to share meeting notes, and were interested in a site visit at a future date.	See issues raised by GHC, March 28, 2012 entry below.
	7/13/2012 10:00 AM	Meeting (Vancouver)	Update Meeting	Meeting between Pretivm, GHC, and GFA. Pretivm gave a presentation on the Project, followed by questions and comments from Chiefs and Pretivm President. Pretivm proposed a site tour.	Employment/Economic Opportunities- Concern Gitanyow won't be hired if another Aboriginal group is preferentially hired.
	8/21/2012 10:30 AM	Site Tour	Project Site Tour- Gitanyow Fisheries Authority	Pretivm provided GFA with a tour of the Project site. Helicopter departed from Gitanyow, flew up Hwy 37 and then along the access road to the camp, landing at 12:30pm. Tour of the property included the core shack and visit with Gitanyow employees. Departed at 3pm, arriving back in Gitanyow at 4pm.	Cumulative Effects- Resulting from increased traffic on Highway 37.
	11/6/2012 3:00 PM	Meeting (Vancouver)	Update Meeting	Pretivm presented the project description to GFA on the Project Description in Vancouver. Cumulative effects were the focus of discussion.	Cumulative Effects- Resulting from increased traffic on Highway 37.

Appendix D. Summary of Communications with Métis and Non-Section 11 Order Aboriginal Groups (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Gitanyow Fisl	heries Authority (GFA) (co 11/20/2013 2:46 PM	ont'd) Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited GFA representatives to public open houses, held from Nov. 25-28, 2013.	N/A
Gitanyow Her	reditary Chiefs (GHC)				
	10/13/2011	Letter	Introductory Letter to Chief Glen Williams	Introduction of Pretivm and an overview of the Brucejack Project to Chief Glen Williams. Request for meeting the week of November 14th - 18th 2011 to introduce the company and Project.	N/A
	11/15/2011 10:00 AM	Meeting (Gitanyow)	Project Introduction Meeting- Gitanyow	Pretivm provided a presentation on the Project (copies of the presentation were also distributed to meeting participants).	Cumulative Effects- General; Cumulative Effects- Moose mortality as a result of traffic- consider Banff-style wildlife crossings; Employment/Economic Opportunities- Gitanyow have capacity to conduct wildlife and fish surveys and have trained environmental coordinators; Fish and Fish Habitat- Sockeye spawning is vital to Gitanyow; Human Health- Medicinal plants, berries, fish, wildlife and water are vital to Gitanyow food security; Socio-economic- Gitanyow does not want "socio-economic" data to be lumped into general socio-economic study; and Wildlife- Consider Banff-style wildlife crossings (assuming Hwy 37 but not clear).
	3/28/2012 10:30 AM	Meeting (Gitanyow)	Update Meeting	Update meeting with presentation by Pretivm and follow-up discussion. Gitanyow suggested there be a funding agreement to support meetings, requested quarterly meetings, would like a Communications Protocol with Pretivm, expressed concerns over truck traffic on Hwy. 37, and asked for a meeting prior to the submission of the Project Description. They asked for Pretivm to share meeting notes, and were interested in a site visit at a future date.	Consultation- Interest in quarterly meetings to discuss

Appendix D. Summary of Communications with Métis and Non-Section 11 Order Aboriginal Groups (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
	editary Chiefs (GHC) (co	nt'd)			
·	7/13/2012 10:00 AM	Meeting (Vancouver)	Update Meeting	Meeting between Pretivm and GHC. Pretivm gave a presentation on the Project, followed by questions and comments from Chiefs and Pretivm President. Pretivm proposed a site tour.	
	8/21/2012 10:30 AM	Site Tour	Site Tour	Pretivm provided Gitanyow Fisheries Authority with a tour of the Project site. Helicopter departed from Gitanyow, flew up Hwy 37 and then along the access road to the camp, landing at 12:30pm. Tour of the property included the core shack and visit with Gitanyow employees. Departed at 3pm, arriving back in Gitanyow at 4pm. Skii km Lax Ha representatives working at the exploration camp also participated in the tour.	Cumulative Effects- Resulting from increased traffic on Highway 37.
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited GHC representatives to public open houses, held from Nov. 25-28, 2013.	N/A
Gitksan Gover	nment Commission				
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited Gitksan Government Commission representatives to public open houses, held from Nov. 25-28, 2013.	N/A
Gitksan Water	shed Authorities (GWA)				
	11/29/2012 1:30 PM	Meeting (Hazelton)	Meeting-Gitxsan Watershed Committee and Pretivm	Meeting between Pretivm and GWA. Began with introductions and Pretivm presentation of Project Description, followed by questions and comments and a closing prayer.	N/A
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited GWA representatives to public open houses, held from Nov. 25-28, 2013.	N/A
Gitsegukla Ele	mentary School				
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited stakeholders to public open houses, held from Nov. 25-28, 2013.	N/A
Gitxsan Chiefs	' Office (GCO)				
	10/13/2011	Letter	Introductory Letter	Introduction of Pretivm and an overview of the Brucejack Project to Chief Sebastian. Request for meeting the week of November 14th - 18th 2011 to introduce the company and Project.	N/A

Appendix D. Summary of Communications with Métis and Non-Section 11 Order Aboriginal Groups (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Gitxsan Chiefs	s' Office (GCO) (cont'd) 11/16/2011 10:00 AM	Meeting (Hazelton)	Project Introduction Meeting	Pretivm gave a presentation on the Project including the exploration program, exploration road construction, and the conceptual development plan to the GCO in Hazelton. Pretivm answered questions about and discussed the Project.	Consultation- Request for regular update meetings with Pretivm; Education/Training- Gitxsan may be able to deliver training locally for mining related jobs; preference for training to be available locally; Education/Training- Interest in mining-related training opportunities; Education/Training- Potential interest in Pretivm participating in career fairs; Employment/Economic Opportunities- GCO want to see development, investment, and employment; Project Roads- General comment about controlling access on exploration roads; Rights and Title- Treaty Creek is a very sensitive boundary for Gitxsan; Tailings Management- Sub-aqueous deposition of tailings in Brucejack Lake (water contamination); and Water Quality- General.
	3/28/2012 1:30 PM	Meeting (New Hazelton)	Update Meeting	Project update meeting between Pretivm Gitxsan Development Corporation (GDC), and GCO. Began with introduction and Pretivm presentation, followed by questions and comments, including topics related to water, wildlife, training and employment, and Project footprint. Meeting concluded with traditional gift and closing.	Consultation- GCO would like Pretivm to consider a basic protocol for a relationship as Project moves forward including support to attend consultation meetings; Consultation- Interested in Project-related benefits; Consultation- Would like to tour the site; Education/Training- Consider offering training in Hazelton in conjunction with NWCC; Education/Training- Interested in wildlife monitoring and training; Employment/Economic Opportunities- Gitxsan Development Corporation interested in exploring business opportunities; Employment/Economic Opportunities- Interested in training and employment outreach; Traditional Knowledge/Use- Concern about "traditional animals and plants"; Water Quality- General; Wildlife- Effects of transportation on wildlife (unspecified).

Appendix D. Summary of Communications with Métis and Non-Section 11 Order Aboriginal Groups (until March 31, 2014)

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Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Gitxsan Chiefs	' Office (GCO) (cont'd)				
	8/22/2012 9:00 AM	Site Tour	Site Tour- GCO, Skeena Fisheries, MARR, SKLH	Pretivm provided a site tour for members of the GCO, Skeena Fisheries Commission, and MARR. Helicopter left from New Hazelton, travelled along Hwy 37 then along the access road to the Project site (arrived 10am). Toured the site including the core shack and departed at noon. Also discussed development plans and potential to use Gitxsan Development Corporation. Skii km Lax Ha representatives working at the exploration camp also participated in the tour.	N/A
	9/13/2012 4:27 PM	Email		Pretivm requested permission to use the shapefiles of the Gitxsan Traditional Territory obtained for use on another project for the proposed Brucejack Gold Mine Project.	N/A
	9/14/2012 9:00 AM	Phone	Gitxsan Traditional Territory Shapefiles Permission	Pretivm phoned GCO to request permission to use previously provided Gitxsan traditional territory shapefiles. GCO agreed that the shapefiles could be used as per previous agreement on how they could be used for another mining project.	N/A
	9/14/2012 9:36 AM	Email		GCO attached the Gitxsan Territory map for Pretivm's use. No changes to be made without prior consent of the GCO and respective chiefs.	N/A
	7/18/2013	Letter	-	Pretivm provided GCO with a package consisting of a cover letter, hard copy, and CD containing a digital copy of the Brucejack Gold Mine Project-Archaeological Impact Assessment Final Report-Heritage Inspection Permit 2011-0245.	N/A
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited GCO representatives to public open houses, held from Nov. 25-28, 2013.	N/A
Gitxsan Develo	opment Corporation				
	3/28/2012 1:30 PM	Meeting (New Hazelton)	Update Meeting-Gitxsan- Pretivm	Project update meeting between Pretivm and Gitxsan. Began with introduction and Pretivm presentation, followed by questions and comments, including topics related to water, wildlife, training and employment, and Project footprint. Meeting concluded with traditional gift and closing.	Consultation- Would like to tour the site; and Employment/Economic Opportunities- Gitxsan Development Corporation interested in exploring business opportunities.
	wet'in Education Facility 11/20/2013 2:46 PM	/ Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited stakeholders to public open houses, held from Nov. 25-28, 2013.	N/A

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Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Kispiox Band	Council				
	11/20/2013 2:46 PM	Email	Invitation to an Open House on the Brucejack Gold Mine Project	Pretivm invited band council representatives to public open houses, held from Nov. 25-28, 2013.	N/A
Métis Nation I	British Columbia (MNBC	)			
	12/20/2012	Letter	Introduction of the Brucejack Project	Pretivm submitted a letter to the Tri-River Métis Association introducing the Brucejack Project and offering to share the project description and answer any questions.	N/A
	12/20/2012	Letter	Introduction of the Brucejack Project	Pretivm provided the Northwest BC Métis Association with a letter introducing the Brucejack Project, and offered to provide project description and answer any questions.	N/A
	12/20/2012 9:58 AM	Email	Introduction of the Brucejack Project	Pretivm provided the MNBC with copies of letters introducing the Brucejack Project, sent to the Northwest BC Métis Association and the Tri-Rivers Métis Association.	N/A
	11/21/2013 12:56 PM	Email	Invitation to an open House on the Brucejack Gold Mine Project	Pretivm notified MNBC of the upcoming series of Draft AIR Open Houses in NW 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 formal letter to the President, which included a brief Project update and notification of the public comment period on the Draft AIR.	N/A
	12/18/2013 3:21 PM	Email	Brucejack Project Métis Interests Report	Pretivm provided MNBC (cc. Tri-River Métis Association and Northwest BC Métis Association) with a desktop study of possible Métis interests done for the Project. Sources reviewed for the study included the BC Métis Mapping Research Project. Comments on, and additional information for, the report were welcome (requested by January 31, 2014).	N/A
	1/21/2014 11:00 AM	Email		Pretivm followed up, on behalf of Pretivm, with the Métis Nation of BC (MNBC) regarding feedback on the Métis Interests Desktop Study. Pretivm requested that the MNBC provide feedback within the next two to three weeks if possible.	N/A
	1/28/2014 11:39 AM	Email	Métis Desktop Study for the Brucejack Gold Mine Project	Pretivm followed up on previous email regarding timelines for comment on the Brucejack Gold Mine Project: Métis Interests Desktop Study.	N/A

Appendix D. Summary of Communications with Métis and Non-Section 11 Order Aboriginal Groups (until March 31, 2014)

Aboriginal Group Name C	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
	tish Columbia (MNBC) /29/2014 12:59 AM	(cont'd) Email		MNBC replied to Pretivm that they had some comments drafted on the Métis Interests Desktop Study, but needed to review them before sending it back.	N/A
2/	/11/2014 4:20 PM	Email	1 ,	Pretivm inquired whether MNBC had had a chance to review the draft comments from the Métis Nation Desktop Study.	N/A
2/	/12/2014 2:59 PM	Email		MNBC provided comments on the Métis Desktop Study for the Brucejack Project.	Aboriginal-Concern about the sources used in the Métis Desktop Study (MNBC).
2/	/20/2014 3:43 PM	Email		Pretivm thanked MNBC for their feedback on the Métis Desktop Study, and advised that Pretivm will be responding.	N/A
2/	/25/2014 10:50 AM	Email	Métis Nation BC Comments on Métis Interests Desktop Study	Pretivm responded to MNBC's concern about access issues regarding use of the MNBC Historic Document Database. An attached letter provided more detail about how information was obtained for the desktop study of Métis interests for the Brucejack Gold Mine Project, notably through publicly available sources. Changes would be made to the report based on MNBC's concerns.	N/A
3/	/3/2014	Phone	Métis Nation BC Comments on Métis Interests Desktop Study	Pretivm called MNBC and left a message as a follow-up to Pretivm's Feb. 25, 2014 letter.	N/A
3/	/12/2014 11:36 AM	Email	Métis Nation BC Comments on Métis Interests Desktop Study	Pretivm followed up with MNBC regarding comments on the Metis Interests Desktop Report, and expressed interest in setting up an introductory telephone conversation to discuss any concerns and comments.	N/A
3/	/21/2014 3:00 PM	Phone	Métis Nation BC Comments on Métis Interests Desktop Study	MNBC called to follow-up on an email/phone conversation related to the Metis Interests Desktop Study and data sources that were accessed. MNBC is satisifed with Pretivm's repsonse and Pretivm inquired whether MNBC had additional input they would like to share for the Metis Interests Desktop Study. A MNBC researcher would look into it.	N/A

Appendix D. Summary of Communications with Métis and Non-Section 11 Order Aboriginal Groups (until March 31, 2014)

Aboriginal Group Name	Communication Date	Communication Method	Communication Subject	Communication Summary	Issues Raised*
Northwest BC	Métis Association 12/20/2012	Letter	Introduction of the Brucejack Project	Pretivm provided the Northwest BC Métis Association with a letter introducing the Brucejack Project, and offered to provide project description and answer any questions.	N/A
	11/21/2013 12:57 PM	Email	Invitation to an open House on the Brucejack Gold Mine Project	Pretivm notified Northwest BC Métis Association of the upcoming series of Draft AIR Open Houses in NW 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 formal letter to the President, which included a brief Project update and notification of the public comment period on the Draft AIR.	N/A
	12/18/2013 3:21 PM	Email	Brucejack Project Métis Interests Report	Pretivm provided Métis Nation BC (cc. Tri-River Métis Association and Northwest BC Métis Association) with a desktop study of possible Métis interests done for the Project. Sources reviewed for the study included the BC Métis Mapping Research Project. Comments on, and additional information for, the report were welcome (requested by January 31, 2014).	N/A
Skeena Fisher	ies Commission				
	8/22/2012 9:00 AM	Site Tour	Site Tour- GCO, Skeena Fisheries, MARR, SKLH	Pretivm provided a site tour for members of the GCO, Skeena Fisheries Commission, and MARR. Helicopter left from New Hazelton, travelled along Hwy 37 then along the access road to the Project site (arrived 10am). Toured the site including the core shack and departed at noon. Also discussed development plans and potential to use GDC.	N/A
Tri-River Méti					
	12/20/2012	Letter	Introduction of the Brucejack Project	Pretivm submitted a letter to the Tri-River Métis Association introducing the Brucejack Project and offering to share the project description and answer any questions.	N/A

Appendix D. Summary of Communications with Métis and Non-Section 11 Order Aboriginal Groups (until March 31, 2014)

Aboriginal	Communication			
Group Name Communication Date	Method	Communication Subject	Communication Summary	Issues Raised*
Tri-River Métis Association (cont'd)				
11/21/2013 12:57 PM	Email	Invitation to an open House on the Brucejack Gold Mine Project	Pretivm notified Tri-River Métis Association of the upcoming series of Draft AIR Open Houses in NW 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 formal letter to the President, which included a brief Project update and notification of the public comment period on the Draft AIR.	N/A
12/18/2013 3:21 PM	Email	Brucejack Project Métis Interests Report	Pretivm provided Métis Nation BC (cc. Tri-River Métis Association and Northwest BC Métis Association) with a desktop study of possible Métis interests done for the Project. Sources reviewed for the study included the BC Métis Mapping Research Project. Comments on, and additional information for, the report were welcome (requested by January 31, 2014).	N/A
Wilp GwinNitxw				
7/18/2013	Letter	Archaeological Impact Assessment Letter to Wilp GwinNitxw	Pretivm sent letter with hard copy and CD of the Brucejack Gold Mine Project - Archaeological Impact Assessment, Final Report - Heritage Inspection Permit 2011-01245 to Wilp GwinNitxw.	N/A
			(Package was returned as undelivered to Wilp GwinNitxw)	
Wilp Spookw/Guuhadakw/Yagosip				
10/16/2013	Letter	Heritage Inspection Permit	The Archaeological Impact Assessment Final Report-Heritage Inspection Permit 2011-0245 mailed to Wilp Spookw/Guuhadakw/Yogosip was returned to Pretivm as unclaimed, prompting a letter of inquiry from Pretivm. Pretivm requested clarification if communication should be directed to another contact.	N/A
Wilp Wilxl'lskwhl Nisga'a Institute				
11/20/2013 2:46 PM	Email	Gold Mine Project	Pretivm invited stakeholders to public open houses, held from Nov. 25-28, 2013.	N/A

<sup>\*</sup>NOTE: Draft responses to these issues are included in the issues tracking table in Appendix H.

## Appendix E Skii km Lax Ha Issues Tracking Table (until March 31, 2014) BRUCEJACK GOLD MINE PROJECT **Pre-Application Aboriginal Consultation Report**

### Appendix E. Skii km Lax Issues Tracking Table (until March 31, 2014)

Issue	Pretivm Response*
	A separate subsection on the effects to Skii km Lax Ha rights and title, and related interests (Section 26.X.X), is found in Chapter 26, First Nations Interests. Chapter 25, Current Aboriginal Use discusses current Aboriginal use. The chapter is organized by land use activity with Skii km Lax Ha specific information discussed for each land use activity.
Aboriginal- Draft AIR does not clearly lay out how the Skii km Lax Ha will be engaged to help interpret the impact on use of land and impact to rights.	Pretivm will organize a workshop with Skii km Lax Ha once the Current Aboriginal Use chapter has been drafted. This response will need to be updated following that workshop.
Aboriginal- Interested in discussing proposed mitigations with the proponent.	Pretivm will organize a workshop with Skii km Lax Ha once the Current Aboriginal Use chapter has been drafted. This response will need to be updated following that workshop.
EA Methodology- Difference between commercial and non-commercial land-use as it applies to First Nations traditional land use and where in EA would the latter be considered.	Effects to commercial and non-commercial land use, excluding Aboriginal land use, are assessed in Chapter 24 of the Application/EIS, "Commercial and Non-commercial Land Use." Consideration of First Nations land use is assessed in Chapter 25 of Application/EIS, "Current Use of Lands and Resources for Traditional Purposes" in accordance with feedback provided by the Skii km Lax Ha in previous consultation, as well as requirements under section 5(1)(c) of the Canadian Environmental Assessment Act (2012) and sections 9.1.3 and 10.1.3 of the EIS Guidelines for the Brucejack Project.
EA Methodology- Interested in discussing the definitions of the significance ratings.	Pretivm is willing to consult on this matter and will contact the Skii km Lax Ha to arrange this.
EA Methodology- Rationale for excluding an assessment of exploration road construction.	The exploration access road was permitted and constructed as part of the exploration phase of the Project. A screening level effects assessment was completed and provided to the Canadian Environmental Assessment Agency (CEA Agency) to support the permitting process of the exploration access road. The scope of the assessment of the Application/EIS includes the construction, operation, closure, and post-closure phases of the Project and does not include the exploration phase of the Project. Upgrades to the road required to support operational traffic of the Project and use of the access road from construction through post-closure will be considered in the Application/EIS.
EA Methodology- Where in Application will current use of lands and resources, including economic losses to Aboriginal groups, be captured.	Consideration of First Nations land use is assessed in Chapter 25 of Application/EIS, "Current Use of Lands and Resources for Traditional Purposes." Potential economic losses to Aboriginal groups from changes to current use of lands and resources are assessed in this chapter. Potential economic effects to Aboriginal groups not related to land and resource uses are assessed in the Chapter 19, "Assessment of Potential Economic Effects". How these potential effects relate to factors under section 5(1)(c) of CEAA 2012 are discussed further in Chapter 26, Asserted or Established Aboriginal Rights and Interests.
Education/Training- Interest in training to create a skilled labour force to take advantage of employment opportunities.	Pretivm will adopt a number of policies or company strategies that consider the needs of workers from regional and Aboriginal communities and are aimed at increasing the level of employment participation in the Project. Workforce training will play an essential role especially in the economic Regional Study Area (RSA). A Workforce Training Strategy will be implemented with a strategy on training and skill development offered to Project employees across departments, including on-the job training, in order to support on-going enhancement of worker skillsets and internal job advancement (Section 19.5.1. of Chapter 19, Assessment of Potential Economic Effects).
Project Design- Preference for burning waste wood at Brucejack site.	The Waste Management Plan (Section X of Chapter 27, Environmental Management and Monitoring Plans) refers to the disposal of waste lumber that cannot be re-used by means of burning it in on-site incinerators. An exception is pressure-treated lumber containing hazardous compounds, which will be removed from site for disposal in an appropriately permitted facility.

### Appendix E. Skii km Lax Issues Tracking Table (until March 31, 2014)

Issue	Pretivm Response*
Traditional Knowledge/Use- Confidentiality concerns related to sensitive information in TK/TU Study.	No TK/TU information gathered to date from Skii km Lax Ha has been identified by Skii km Lax Ha as sensitive or requiring confidentiality. Pretivm understands the sensitive nature of some TK/TU information and will consider any requests from Skii km Lax Ha to treat any sensitive TK/TU information appropriately.
Wildlife - Increase in bear and martin sightings near camps as a result of cooking odors in camp.	A Waste Management Plan (Chapter 27, Environmental Management and Monitoring Plans) will outline appropriate garbage and waste management activities, which will mitigate the potential for bears to become attracted to camp cooking odours. An "Environmental Management Plan for Bear, Marten, and Camp Hygiene" has been developed to minimize wildlife-human interaction and attraction to site during Pretivm exploration activities. This plan was provided to the Skii km Lax Ha for review and comment. The goal of waste and wildlife attractant management is to minimize the potential for human-wildlife interactions through the control of wastes and potential wildlife attractants in the Project area. All staff will receive training during an initial orientation and thereafter on an annual basis, which will include a presentation on potential problem wildlife and what staff can do to prevent interactions.
Wildlife- Observed impacts to bear and marten during the summer as a result of (unspecified) Project activity.	As a result of concerns raised by the Skii km Lax Ha, an initial draft "Environmental Management Plan for Bear, Marten, and Camp Hygiene" was developed to minimize wildlife-human interaction and attraction to the Project area. This document was sent to Skii km Lax Ha for review and feedback. Pretivm has considered and incorporated comments received from Skii km Lax Ha on the draft plan.
Wildlife- Plow escape openings for moose in snow banks along access road where the road curves.	Pretivm agrees with the comment raised regarding locations of escape openings for moose along the access road. The Wildlife Management and Monitoring Plan (Section 27.21 of Chapter 27, Environmental Management and Monitoring Plans of the Application/EIS) includes a commitment stating that refuge areas will be ploughed along the road during winter; further, gaps in snow banks on roads will be created at optimal spacing to allow an escape for wildlife, preferably on corners to allow moose to escape.

<sup>\*</sup>NOTE: Responses are currently in draft form and will be updated for inclusion in the final issues tracking tables that will appended to the Information Distribution and Consultation Chapter of the Application/EIS. Numerical references to specific chapters and/or sections of the Application/EIS are likely to change.

Reference

2012. Canadian Environmental Assessment Act, 2012, SC. C. 19. S. 52.

# Appendix F Tahltan Nation Issues Tracking Table (until March 31, 2014) BRUCEJACK GOLD MINE PROJECT **Pre-Application Aboriginal Consultation Report**

Appendix F. Tahltan Nation Issues Tracking Table (until March 31, 2014)

Issue	Pretivm Response*	Issue Raised By
Traffic-Concern about number of trucks and traffic on Highway 37 from a wildlife perspective.	The effects of increased traffic along Highway 37 on moose and grizzly bears are assessed in the Cumulative Effects Assessment section of the Wildlife Effects Assessment chapter (Section 18.9 of Chapter 18, Assessment of Potential Wildlife Effects) in the Application/EIS. Cumulative residual effects on wildlife (Section 18.9.5 of Chapter 18) include: 1) disruption of movement, direct mortality, and indirect mortality for moose; 2) disruption of movement, direct mortality, indirect mortality, and attractants for grizzly bear; 3) sensory disturbance and indirect mortality for mountain goat; 4) attractants for American marten; and, 5) direct mortality and indirect mortality for western toad. An analysis was conducted for each species to characterize the cumulative residual effects, significance, likelihood and confidence (Section 18.9.5 of Chapter 18). The cumulative residual effect of increased traffic along Highway 37 is considered to be not significant. Pretivm is participating in a regional traffic impact study along Hwy 37 being chaired by the BC EAO.	TCC
Cumulative Effects- Would like to be involved in the design of the cumulative effects study.	Management of cumulative effects is the responsibility of all contributors to a cumulative effect. Pretivm is open to discussions on this subject and will defer to the BC EAO and the CEA Agency to guide the establishment of future subworking groups on cumulative effects as required. A regional traffic impact study that is being chaired by the BC EAO has been initiated to consider cumulative effects along Hwy 37; Pretivm is a committed participant to this cumulative impact study.	TCC
Project Roads- Brucejack Access Road should be included within the scope of the EA.	Upgrades to the existing exploration access road and use throughout the construction and operation phases of the Project are included in the scope of the project to be assessed.	TCC
Project Roads- Comparative analysis of impacts of building a new access road and upgrading the existing exploration road, including effects to moose.	Ground access to the mine Knipple Transfer Area are considered in Chapter 4 (Alternatives Analysis), including a screening level comparison of upgrading the existing exploration access road, constructing a new access road extending north for the Granduc area in the Upper Bowser River Valley, and barging across Bowser Lake. Options other than upgrading the existing exploration access road were identified to be unfeasible from an economic and/or technical perspective.	TCC
Wildlife- Cumulative impacts to moose, especially as a result of the access road.	The effects of traffic along the access road on moose are assessed in the Wildlife Effects Assessment chapter (Section 18.6.1 of Chapter 18) in the Application/EIS. Residual effects on moose (Section 18.7.1 of Chapter 18) include: disruption of movement, direct mortality, and indirect mortality. An analysis was conducted for each species to characterize the residual effects, significance, likelihood and confidence. The residual effect of disruption of movement, direct mortality, and indirect mortality due to the Project (including the access road) is considered to be not significant.	TCC
Cumulative Effects- Eight new mines proposed in Tahltan territory.	Past, present and reasonably foreseeable future projects with the potential to interact with the Brucejack Gold Mine Project are listed in section 6.9.1 in Chapter 6, Assessment Methodology. The projects that are considered include a variety of proposed mining, hydroelectric, gas transmission line, pipeline and LNG projects. Some of these proposed projects such as the Red Chris Project, Northwest Transmission Line, Forrest Kerr Hydroelectric Power Facility, KSM Project, and the Arctos Anthracite Coal Project are within, or overlap Tahltan traditional territory. Potential cumulative effects between potential residual effects of the Brucejack Project and these regional projects are -considered in each predictive study and effects assessment chapter, as well the Federal Cumulative Effects Assessment (Chapter 34 of the Application/EIS).	TCC, THREAT

<sup>\*</sup>NOTE: Responses are currently in draft form and will be updated for inclusion in the final issues tracking tables that will appended to the Information Distribution and Consultation Chapter of the Application/EIS. Numerical references to specific chapters and/or sections of the Application/EIS are likely to change.

# Appendix G Nisga'a Nation Issues Tracking Table (until March 31, 2014) BRUCEJACK GOLD MINE PROJECT **Pre-Application Aboriginal Consultation Report**

Appendix G. Nisga'a Nation Issues Tracking Table (until March 31, 2014)

Issue	Pretivm Response*	Issue Raised By
Aboriginal- Any impact to traditional foods (e.g. fish harvesting- present and future) is an impact to treaty rights regardless of consumption.	Potential effects to traditional foods are assessed in Chapter 21, Assessment of Potential Health Effects and summarized in Chapter 25, Current Use of Land and Resources for Traditional Purposes. Impacts to traditional foods as they relate to treaty rights will be discussed in Chapter 27, Assessment of Nisga'a Nation Treaty Rights, Interests, and Information Requirements. Impacts to harvesting are discussed in Chapter 25. There are no anticipated effects to fish and cultural plant harvesting in the Nass Area and effects to moose, grizzly bear and mountain goat are not anticipated to be significantly affected.	NLG
Consultation- Concern about low level of attendance by Nisga'a at the Nov. 25, 2013 Open House in New Aiyansh.	Pretivm placed notices 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, Terrace Standard, and Interior News. Pretivm notified NLG and the four village governments of the open house in New Aiyansh and provided advertising materials for posting in the villages including small posters. Pretivm will continue to work with NLG and village governments for better outreach in advance of the next anticipated open house, which will be likely be following submission of the Application/EIS.	Gitlaxt'aamiks Village Government
Consultation- Establishment of, and adherence to, a formal Nisga'a communications protocol.	A Communications Protocol was signed by Pretivm and NLG in February 2013.	NLG
Consultation- Pretivm to provide baseline material to NLG directly (not via provincial and federal governments).	Baseline reports have been distributed to the BC EAO Project Working Group, of which NLG is a member. Pending the signing of a Funding Agreement with NLG Pretivm will provide the material directly to NLG.	NLG
Consultation- Would like the Preliminary Economic Assessment (PEA) to be presented to NLG.	Pretivm presented the PEA results in a meeting with NLG on April 4, 2012 in Vancouver, BC.	NLG
Employment/Economic Opportunities- General Interest.	Pretivm will implement an Engagement Strategy under which regular and formal communications will take place with local and Aboriginal governments within the Regional Study Area (RSA) and Local Study Area (LSA) to describe economic details of the Project such as employment statistics, procurement spends, including a break-down of LSA spends, and types of goods and services purchased. Information will assist communities in their economic planning activities. Further, expected Project benefits relate to Project regional spending and employment, as well as spending and employment in BC and Canada (Section 1.9 of Chapter 1, Project Overview). Indirect and induced Project benefits such as increase in household income, higher GDP/output, and supplier industries to benefit from the Project are also assessed.	Gitlaxt'aamiks Village Government
Employment/Economic Opportunities- Select the union for contracting so Nisga'a Villages can start speaking with them proactively.	Pretivm will assist in connecting the relevant individuals within Nisga'a Nation and First Nations with external organizations including contractors and other potential suppliers to the Project. This is to facilitate the development of relationships between Aboriginal workers and businesses, and between Aboriginal businesses and non-Aboriginal businesses. It is not appropriate for Pretivm to preferentially encourage the development of relationships with specific unions; rather, the Engagement Strategy will foster the development of relationships among all interested and active participants with an interest in benefiting from the Project, as appropriate.	Gitlaxt'aamiks Village Government
Employment-Economic Opportunities- NLG would like to be involved in all stages of the Project from construction, to maintenance, to reclamation.	Pretivm is committed to developing an IBA with NLG.	NLG
ESCIA- Interest in case studies that discuss Aboriginal experiences with mining in BC.	Case studies are included Appendix 2 of the Nisga'a Economic, Social, Cultural Impact Assessment (ESCIA) report. The case studies include a summary of publically available information on mines in BC that have established a variety of agreements with First Nations in recent years. Examples are presented from projects such as the Eskay Creek Mine, the proposed Kemess North Project, the Huckleberry Mine expansion project and others. Appendix 2 provides a discussion of the growing role of Impact Benefit Agreements (IBAs) and other types of agreements that are used to formalize relationships between project proponents and local Aboriginal groups in BC.	NLG

Issue	Pretivm Response*	Issue Raised By
ESCIA- Interest in cumulative incremental effects and associated mitigation and management measures.	Consideration of cumulative incremental effects is defined in the Nisga'a ESCIA Guidelines (NLG 2010) which outlines NLG's expectations for fulfilment of the requirements of Chapter 10, paragraph 8(f) of the Nisga'a Final Agreement. The consideration of cumulative incremental effects attempts a more dynamic consideration of the effects of the Project in the context of changing conditions brought on by other developments taking place in the region. Cumulative incremental effects are discussed mainly in Section 5: Economic Impact Assessment and Section 8: Scenarios of Cumulative Incremental Effects of the Nisga'a ESCIA report. Scenarios of cumulative incremental effects are derived from economic modeling of three different scenarios of regional economic development that consider conditions of low, medium, and high levels of project development. Mitigation and management measures to address issues and effects identified in the ESCIA report will be included with those developed for and presented in the Application/EIS.	NLG
Fish and Fish Habitat- A water quality incident could affect Sockeye Salmon in Bowser Lake.	Pretivm acknowledges the importance of Sockeye Salmon in Bowser Lake. Sockeye Salmon are known to be present in Bowser Lake (see Table 15.3-3 in Chapter 15, Assessment of Potential Fish and Fish Habitat Effects). The proposed Project will not affect Sockeye Salmon in the Bowser River and Lake watersheds, nor any other watershed with Sockeye Salmon within the regional study area. Significant effects on Sockeye Salmon spawning or rearing (e.g., fish habitat loss) habitat are not predicted due to access road upgrades or use with the proposed mitigation measures (Section 15.6.1 to 15.6.4 of Chapter 15). Significant effects on Sockeye Salmon populations are habitat due a spill are not predicted because of the spill prevention measures proposed and spill response plan (Sections 31 and 15.5.1). Effects on Sockeye Salmon populations and habitat downstream in Bowser Lake, due to a change in water quality, are not predicted to occur because tailings are proposed to be deposited in Brucejack Lake, which is located in the Unuk River watershed. Furthermore, the mine site discharge pathway is towards Brucejack Lake, which is not hydrologically connected to the Nass River or Bowser Lake watersheds; therefore, there would not be any effects on the downstream receiving environment as a result of the discharge of tailings.	NLG
Fish and Fish Habitat- Nisga'a fish for spring salmon in Bowser Lake.	Pretivm acknowledges the importance of Nisga'a Chinook Salmon fishing in Bowser Lake. Chinook Salmon are known to be present in Bowser Lake (see Table 15.3-3 in Chapter 15, Assessment of Potential Fish and Fish Habitat Effects). The proposed Project will not affect Chinook Salmon in the Bowser River and Lake watersheds, nor any other watershed with Chinook Salmon within the regional study area. Effects on Chinook Salmon spawning or rearing (e.g., fish habitat loss) habitat are not predicted due to access road upgrades or use with the proposed mitigation measures (Section 15.6.1 to 15.6.4 of Chapter 15). Effects on Chinook Salmon populations and habitat downstream in Bowser Lake are not predicted to occur because tailings are proposed to be deposited in Brucejack Lake, which is located in the Unuk River watershed. Furthermore, the mine site discharge pathway is towards Brucejack Lake, which is not hydrologically connected to the Nass River or Bowser Lake watersheds; therefore, there would not be any effects on the downstream receiving environment as a result of the discharge of tailings.	NLG
Human Health- Consider a food web study in Nass area to ensure impacts are captured.	Country foods are included in the human health impact assessment both for baseline conditions (Appendix 21-A of Chapter 21) and for predicted Project-related potential effects (Chapter 21). The approach for the assessment of human health due to consumption of country foods was based on Health Canada guidelines for assessing food issues in environmental impact assessment (Health Canada 2010a, 2010c, 2010b, 2010d). The country foods baseline study area was chosen based on the proposed infrastructure footprint, Project development, physical barriers, and watershed boundaries (see Appendix 21-A, Section 5). The country foods baseline LSA was adopted as the country foods effects assessment LSA. For further information on the country foods baseline study area, please refer to Appendix 21-A, Section 5. The Nass Area is to the southeast of the country foods LSA. The extent of any potential Project related changes in the quality of country foods are expected to remain within the country foods LSA. Therefore no Project related human health effects due to consumption of country foods from the Nass area are expected.	NLG

Appendix G. Nisga'a Nation Issues Tracking Table (until March 31, 2014)

Issue	Pretivm Response*	Issue Raised By
Hydrology- Potential impacts on the Knipple Glacier and the watershed due to glacial melt and vehicle traffic.	Glaciers were considered as a sub-component of surface water hydrology in the EIS/Application (Section 10.4.1). Glacier ablation, which is of primary concern, was selected as an indicator for this sub-component. Potential effects of the Project, including debris and increased dust, on Knipple Glacier have been characterized qualitatively. The potential effects of the access road debris on the glaciohydrology of the Knipple Glacier are assessed in Appendix 10-D. Based on a first approximation analysis of the glaciohydrology, the changes in the summer ablation of Knipple Glacier due to the access road are less than 1% of the baseline summer ablation values. Increased fugitive dustfall levels were estimated due to their potential effect on albedo, and in turn, on glacier melt. The air quality dispersion model (Chapter 7) predicted increased dustfall levels covering approximately 3 km of the southeast end, and 200 m of the northwest end, of Knipple Glacier. The dustfall level on these segments of Knipple Glacier is predicted to be up to 0.95 mg/dm²/day (Chapter 7). Compared to the baseline level of 0.71 gm/dm²/day, this is approximately an increase of 34%, but it is still lower than the objectives of 1.7 to 2.9 mg/dm²/day stated in the provincial objectives (BC MOE 1979).	NLG
Project Roads- Brucejack Access Road should be included within the scope of the EA.	Upgrades to the existing exploration access road and use throughout the construction and operation phases of the Project are included in the scope of the project to be assessed.	NLG
Water Quality- Add Knipple Creek to baseline water quality program (related to concerns related to glacial melt and potential sedimentation).	Knipple Creek was added to the baseline water quality program in September of 2013, referred to as "Knipple Glacier Outflow" in both the Cumulative Water Quality and Aquatic Resources Baseline Reports, appended to Chapters 13 (Assessment of Potential Surface Water Quality Effects) and 14 (Assessment of Potential Aquatic Resources Effects) respectively. In 2013, Knipple Glacier Outflow was sampled monthly from September to November and will be sampled monthly in 2014. Additionally, samples were collected at three points along Knipple Glacier itself to determine any effects from the existing road. Water quality parameters measured include: general physicochemistry (total suspended solids, pH), nutrients, anions and metals (total and dissolved).	NLG
Water Quality- Concern about potential for leach tailings to affect Bowser Lake.	Pretivm acknowledges the importance of water quality within the Bowser River. Changes in water quality are not predicted to occur as tailings and waste rock are proposed to be deposited in Brucejack Lake, which is located in the Unuk River watershed. Furthermore, the mine site discharge pathway is towards Brucejack Lake, which is not hydrologically connected to the Bowser Watershed; therefore, there would not be any effects to the Bowser River or Bowser Lake as a result of tailings discharge.	NLG
Wildlife- Cumulative impacts to moose, especially as a result of the access road.	The effects of traffic along the access road on moose are assessed in the Wildlife Effects Assessment chapter (Section 18.6.1 of Chapter 18) in the Application/EIS. Residual effects on moose (Section 18.7.1 of Chapter 18) include: disruption of movement, direct mortality, and indirect mortality. An analysis was conducted for each species to characterize the residual effects, significance, likelihood and confidence. The residual effect of disruption of movement, direct mortality, and indirect mortality due to the Project (including the access road) is considered to be not significant.	NLG
Wildlife- General interest.	Please refer to Chapter 18, Assessment of Potential Wildlife Effects for information on the wildlife effects assessment. Wildlife VCs included in the Application/EIS are moose, mountain goat, grizzly bear, American marten, hoary marmot, bats, migratory waterbirds, migratory landbirds, raptors, amphibians (western toad). Rationale for inclusion and exclusion of wildlife VCs in the effects assessment is provided in Tables 18.4-2 and 18.4-3 of Chapter 18. Wildlife management plans are included in Section X of Chapter 29, Environmental Management and Monitoring Plans.	Gitlaxt'aamiks Village Government

\*NOTE: Responses are currently in draft form and will be updated for inclusion in the final issues tracking tables that will appended to the Information Distribution and Consultation Chapter of the Application/EIS. Numerical references to specific chapters and/or sections of the Application/EIS are likely to change.

#### Reference

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Health Canada. 2010a. Federal Contaminated Site Risk Assessment in Canada, Part V: Guidance on Human Health Detailed Quantitative Risk Assessment for Chemicals (DQRA chem).

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## Appendix H

Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until March 31, 2014)

BRUCEJACK GOLD MINE PROJECT

**Pre-Application Aboriginal Consultation Report** 

Appendix H. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until March 31, 2014)

Issue	Pretivm Response*	Issue Raised By
Aboriginal- Concern about the sources used in the Métis Desktop Study.	Pretivm acknowledges Métis Nation BC's (MNBC) concern about the potential inappropriate access of the MNBC Historic Document Database. Information included in the Métis Interests Desktop Study (a draft of which was provided to MNBC for comment) was derived from publicly available sources, including the KSM Project: Métis Interests Desktop Study (Rescan 2013), and was not a result of direct access to the MNBC Historic Document Database. Pretivm is amending the report to reflect the appropriate data source attribution. Further, a review of all sources, including the BC Métis Federation, the MNBC Consultation Guidelines, and MNBC Natural Resources Act will be completed in light of MNBC's comments.	Métis Nation BC
Consultation- Consider a funding agreement with Gitanyow Hereditary Chiefs (GHC) to facilitate Gitanyow participation in consultation activities (GHC to provide budget for Pretivm to review).	GHC raised this issue in a meeting with Pretivm on March 28, 2012. On July 4 2013, the BC EAO issued a Section 11 Order under the British Columbia Environmental Assessment Act confirming Pretivm's obligations to consult with Aboriginal groups. The Order listed Nisga'a Nation, Tahltan Nation, and Skii km Lax Ha as requiring consultation by Pretivm. The BC EAO states in the Section 11 Order (Section 13) that it will consult with Gitanyow Wilp Wii'litsxw through the GHC. Prior to this direction from BC EAO, Pretivm met with the GHC on November 15th 2011, March 28th, 2012, and July 13th 2012 to discuss the Project and Gitanyow interests that could be potentially affected by the Project. Pretivm also provided GHC representatives with a tour of the site on August 21st, 2012. Pretivm will consult further with GHC should Gitanyow specific issues arise requiring further discussion and consideration.	GFA, GHC
Consultation-The Gitxsan Chiefs Office (GCO) would like Pretivm to consider a basic protocol for a relationship as Project moves forward including support to attend consultation meetings.	GCO raised this issue in a meeting with Pretivm on March 28, 2012. On July 4 2013, the BC EAO issued a Section 11 Order under the <i>British Columbia Environmental Assessment Act</i> (2002) confirming Pretivm's obligations to consult with Aboriginal groups. The Order listed Nisga'a Nation, Tahltan Nation, and Skii km Lax Ha as requiring consultation by Pretivm. Prior to this direction from BC EAO, Pretivm met with the GCO on November 16th 2011 and March 28, 2012 to discuss the Project and Gitxsan interests that could be potentially affected by the Project. Pretivm also provided GCO representatives with a tour of the site on August 22nd, 2012. Pretivm invited GGO representatives to any of the Draft AIR open houses held November 25th-28th in northwest BC. Pretivm will consult further with GCO should Gitxsan specific issues arise requiring further discussion and consideration.	GCO
Consultation- GHC would like a meeting prior to submission of Project Description to BC EAO.	GHC raised this issue at a meeting with Pretivm on March 28th, 2012. Pretivm met with GHC again on July 13th, 2012, and provided GHC representatives with a site tour on August 21, 2012. Pretivm submitted the Project Description to BC EAO on January 5, 2013.	GHC
Consultation- Interest in quarterly meetings to discuss project progress and communicate concerns and interests.	GHC raised this issue in a meeting with Pretivm on March 28, 2012. On July 4 2013, the BC EAO issued a Section 11 Order under the British Columbia Environmental Assessment Act confirming Pretivm's obligations to consult with Aboriginal groups. The Order listed Nisga'a Nation, Tahltan Nation, and Skii km Lax Ha as requiring consultation by Pretivm. The BC EAO states in the Section 11 Order (Section 13) that it will consult with Gitanyow Wilp Wii'litsxw through the GHC. Prior to this direction from BC EAO, Pretivm met with the GHC on November 15th 2011, March 28th, 2012, and July 13th 2012 to discuss the Project and Gitanyow interests that could be potentially affected by the Project. Pretivm also provided GHC representatives with a tour of the site on August 21st, 2012. Pretivm invited GHC to attend any of the Draft AIR Open Houses November 25th to 28th in northwest BC.	GHC

Appendix H. Métis and Non-Section	n 11 Order Aboriginal Groups	<b>Issues Tracking Table (until March 31, 2014)</b>

Issue	Pretivm Response*	Issue Raised By
Consultation- Interested in Project-related benefits.	Pretivm will adopt a number of policies or company strategies that consider the needs of workers from regional and Aboriginal communities and are aimed at increasing the level of employment participation in the Project. Workforce training will play an essential role especially in the economic Regional Study Area (RSA). A Workforce Training Strategy will be implemented with training and skill development offered to Project employees across departments, including on-the job training, in order to support on-going enhancement of worker skillsets and internal job advancement (Section 19.5.1. of Chapter 19, Assessment of Potential Economic Effects). Further, Nisga'a Nation and local First Nations will be engaged to participate in demand-driven development of training programs for Aboriginal workers. Pretivm will partner with Aboriginal communities through the pursuit of Impact Benefit Agreements (IBAs) or other forms of agreements to work with First Nations and Nisga'a Nation to address some of the systemic barriers their community members face with respect to gaining higher levels of education attainment and employment. Pretivm will also implement several plans/strategies such as an Engagement Strategy, a Workforce Sourcing Plan and workforce training programs, which collectively will play an essential role in ensuring that Nisga'a Nation and local First Nations are presented with training and employment opportunities.	GCO
Consultation- Request for regular update meetings with Pretivm.	On July 4 2013, the BC EAO issued a Section 11 Order under the <i>British Columbia Environmental Assessment Act</i> (2002) confirming Pretivm's obligations to consult with Aboriginal groups. The Order lists Nisga'a Nation, Tahltan Nation, and Skii km Lax Ha as requiring consultation by Pretivm. Prior to this direction from BC EAO, Pretivm met with the GCO on November 16th 2011 and March 28, 2012 to discuss the Project and Gitxsan interests that could be potentially affected by the Project. Pretivm also provided GCO representatives with a tour of the site on August 22nd, 2012. Pretivm invited GGO representatives to any of the Draft AIR open houses held November 25th-28th in northwest BC. Pretivm will consult further with GCO should Gitxsan specific issues arise requiring further discussion and consideration.	GCO
Consultation- Would like to tour the site.	Pretivm provided GCO representatives with a tour of the site on August 22nd, 2012.	GCO, Gitxsan Development Corporation (GDC)
Consultation- Would like to tour the site.	Pretivm provided GHC representatives with a tour of the site on August 21st, 2012.	GHC
Cumulative Effects- Moose mortality as a result of traffic- consider Banff-style wildlife crossings.	Mitigations such as wildlife crossings and management of the highways are outside of the scope of the EA, and falls under the jurisdiction of the BC Ministry of Transportation. Pretivm is participating in a regional traffic impact study along Hwy 37 being chaired by the BC EAO.	GHC
Cumulative Effects- Resulting from increased traffic on Highway 37.	The effects of increased traffic along Highway 37 on moose and grizzly bears are assessed in the Cumulative Effects Assessment section of the Wildlife Effects Assessment chapter (Section 18.9 of Chapter 18, Assessment of Potential Wildlife Effects) in the Application/EIS. Cumulative residual effects on wildlife (section 18.9.4 of Chapter 18) include disruption of movement, sensory disturbance, direct mortality, and indirect mortality for moose, Grizzly Bear, mountain goat, and Western Toad. An analysis was conducted for each species to characterize the cumulative residual effects, significance, likelihood and confidence (section 18.9.5 of Chapter 18). The cumulative residual effect of increased traffic along Highway 37 is considered to be not significant.  Daily average vehicle traffic is estimated to be approximately 10 return trips per day, or 20 one-way trips. Vehicles will range in size from small personal vehicles to 40 tonne transport trucks in B-train configuration. Traffic estimates for the Project are described in Section 5.13 of Chapter 5, Project Description, of the Application/EIS. This is considered to be a relatively small proportion of total vehicle traffic along Highway 37. Traffic related issues along Highway 37 are outside the scope of the Project effects assessment; however, Pretivm is participating in a Highway 37 Advisory Group chaired by the BC EAO.	
Education/Training- Consider offering training in Hazelton in conjunction with NWCC.	Pretivm will partner with local education institutions and local Nisga'a and First Nation communities to facilitate training and education for skills relevant to the Project. Activities may include the provision of scholarships and financial contributions for individuals who are looking to pursue mining-related education and training.	GCO, GDC

Appendix H. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until March 31, 2014)

Issue	Pretivm Response*	Issue Raised By
Education/Training-Gitxsan may be able to deliver training locally for mining related jobs; preference for training to be available locally.	Pretivm will partner with local education institutions and local Nisga'a and First Nation communities to facilitate training and education for skills relevant to the Project. Activities may include the provision of scholarships and financial contributions for individuals who are looking to pursue mining-related education and training.	GCO
Education/Training-Interest in mining-related training opportunities.	Pretivm will adopt a number of policies or company strategies that consider the needs of workers from regional and Aboriginal communities and are aimed at increasing the level of employment participation in the Project. Workforce training will play an essential role especially in the economic RSA. A Workforce Training Strategy will be implemented with a strategy on training and skill development offered to Project employees across departments, including on-the job training, in order to support on-going enhancement of worker skillsets and internal job advancement (Section 19.5.1. of Chapter 19, Assessment of Potential Economic Effects). Activities may include the provision of scholarships and financial contributions for individuals who are looking to pursue mining-related education and training. 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.	GCO
Education/Training- Potential interest in Pretivm participating in career fairs.	Pretivm will be participating in a career fair in Gitanyow on April 25, 2014 at GHCO's request.	GCO
Employment/Economic Opportunities-Concern Gitanyow won't be hired if another Aboriginal group is preferentially hired.	Pretivm is committed to providing employment opportunities to individuals from several Aboriginal groups. Pretivm will adopt a number of strategies that consider the needs of workers from Aboriginal communities and are aimed at increasing the level of employment participation in the Project among those who currently experience economic inequality. A Workforce Sourcing Plan will provide the first opportunity for employment to residents of local communities (see Section 19.3.2 of Chapter 19, Economic Effects Assessment), followed by the region and the province (Section 19.5.1 of Chapter 19). Hiring practices will follow BC and federal legislation and regulations with a focus on hiring local and regional residents, but not to the exclusion of others.	GFA, GHC
Employment/Economic Opportunities- GCO want to see development, investment, and employment.	Pretivm will implement an Engagement Strategy under which regular and formal communications will take place with local and Aboriginal governments within the RSA and LSA to describe economic details of the Project such as employment statistics, procurement spends, including a break-down of LSA spends, and types of goods and services purchased. Information will assist communities in their economic planning activities. Further, expected Project benefits relate to Project regional spending and employment, as well as spending and employment in BC and Canada (Section 1.9 of Chapter 1, Project Overview). Indirect and induced Project benefits such as increase in household income, higher GDP/output, and supplier industries to benefit from the Project are also assessed.	GCO
Employment/Economic Opportunities- General Interest.	The Project will provide substantial employment and numerous business opportunities. Through this, it will contribute to household income, and regional and provincial GDP, as well as regional, provincial and federal tax revenue. All Project benefits are described in detail in Section 1.9 of Chapter 1 (Project Overview) of Application/EIS. In general, the Project is expected to create 3,912 person-years of direct (on-site), indirect and induced employment in BC during Construction (estimated duration of 2 years), which will contribute approximately \$308 million to household income. The provincial GDP is expected to benefit by \$395 million, whereas regional, provincial and federal government revenue will increase by approximately \$64 million. During Operations (estimated duration of 22 years), approximately 28,956 person-years of direct (on-site), indirect and induced employment is expected to be created in BC with household income of \$2,331 million. Provincial GDP is expected to increase by \$2,914 million, whereas regional, provincial and federal tax revenue will increase by approximately \$527 million. Construction and Operation of the Project will bring jobs mainly in construction and mining; however, other industries in BC will also benefit, including, but not limited to: professional, scientific, and technical services, accommodation and food services, manufacturing, transportation, warehousing, wholesale and trade.	GFA, GHC

Issue	Pretivm Response*	Issue Raised By
Employment/Economic Opportunities- Gitxsan Development Corporation interested in exploring business opportunities.	The Project will encourage the involvement of local and regional businesses interested in the opportunities to directly and indirectly supply the Project to maximize the benefits within the region. Suppliers will be selected based on location, quality, price, and delivery (among other criteria) with the standards for purchasing determined during the initial stages of the Project. Pretivm is developing a Procurement Strategy to encourage the procurement of goods and services from both local and Aboriginal-owned suppliers, where such goods and services are competitive in quality and price. Some of the companies that are expected to benefit include long-haul and heavy-haul trucking companies, scheduled and charted cargo service located in nearby communities such as Terrace, Smithers and Dease Lake, or barge service that is available from the Port Metro Vancouver, Price Rupert Port or the Port of Stewart. Rail is being considered for shipping from Terrace to Eastern Canada. Other local companies could include businesses in safety services, catering, janitorial, electrical, mechanical, and similar. However, at this point, the specifics of sourcing services locally are not yet known, as this will be determined by the level of interest among regional businesses and their ability to serve the mining sector.	GCO, Gitxsan Development Corporation
Employment/Economic Opportunities- Interested in training and employment outreach.	Pretivm will implement Workforce Sourcing Plan that will provide the first opportunity for employment to residents of the LSA communities, followed by the RSA and the province. Hiring practices will follow BC and federal legislation and regulations with a focus on hiring local and regional residents, where possible, in consultation with local Aboriginal groups and local communities. The Proponent will adopt a number of strategies that consider the needs of workers from regional and Aboriginal communities and are aimed at increasing the level of employment participation in the Project. Strategies will also consider the needs of workers from regional and Aboriginal communities and are aimed at increasing the level of employment participation in the Project. Workforce training will play an essential role especially in the region. A Workforce Training Strategy will be considered with a strategy on training and skill development offered to Project employees across departments, including on-the job training, in order to support on-going enhancement of worker skillsets and internal job advancement (Section 19.5.1. of Chapter 19, Assessment of Potential Economic Effects). Activities may include the provision of scholarships and financial contributions for vulnerable individuals who are looking to pursue mining-related education and training.	GCO, Gitxsan Development Corporation
Fish and Fish Habitat-Sockeye spawning is vital to Gitanyow.	Pretivm acknowledges that Sockeye Salmon spawning is vital to Gitanyow First Nation. Sockeye Salmon are present within the following baseline fish and fish habitat study area watersheds: Bell-Irving River, Bowser River, Bowser Lake, Todedada Creek, and Unuk River. Bowser Lake is known to have a substantial Sockeye Salmon population (see Section 15.3.4.3 in Chapter 15, Assessment of Potential Fish and Fish Habitat Effects). The Bowser Lake Sockeye Salmon population is one of the four main stocks in the Nass system (BC MOE 2008). The Bowser Lake Sockeye Salmon population makes up approximately 8% of the Nass River stock (English, Mochizuki, and Robichaud 2012). The proposed Project will not affect Sockeye Salmon in the Bowser River and Lake watersheds, nor any other watershed with Sockeye Salmon within the regional study area. Effects on Sockeye Salmon spawning (e.g., fish habitat loss) habitat are not predicted due to access road upgrades or use with the proposed mitigation measures (Sections 15.6.1 to 15.6.4 of Chapter 15). Effects on Sockeye Salmon populations and habitat downstream of the Mine Site, due to discharge from Brucejack Lake, are not predicted to occur in the Unuk River (Section 15.6.3 of Chapter 15). The provincial water quality guidelines for the protection of aquatic life are predicted to be achieved prior to entering the fish-bearing receiving environments (Section 15.6.3 of Chapter 15). Similarly, effects on Sockeye Salmon populations and habitat downstream in Bowser Lake are not predicted to occur because tailings are proposed to be deposited in Brucejack Lake, which is located in the Unuk River watershed. Furthermore, the mine site discharge pathway is towards Brucejack Lake, which is not hydrologically connected to the Nass River or Bowser Lake watersheds so there would not be any effects on the downstream receiving environment in relation to the discharge of tailings.	GHC

Appendix H. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until March 31, 2014)

Issue	Pretivm Response*	Issue Raised By
Human Health- Medicinal plants, berries, fish, wildlife and water are vital to Gitanyow food security.	A country foods baseline assessment report was completed for the Application/EIS (Appendix 21-A). In addition, an assessment of potential health effects (Chapter 21) includes an assessment for the potential Project-related effects on country food quality. Country foods included moose, snowshoe hare, grouse, Dolly Varden/bull trout, and berries. The country foods LSA was based on the outer limits of the proposed infrastructure, development, physical barriers, and watershed boundaries. Within the country foods study area, anticipated effects include (summary of effects provided here once completed. It is to be noted that the LSA for country foods and drinking water does not overlap with Gitanyow traditional territory. Project effects to country foods or drinking water quality are note expected outside of the LSA. Therefore, no human health effects from country foods or drinking water to Gitanyow are anticipated.	GHC
Project Design- Designing for ground stability in the advent of potential earthquakes.	The project will be designed and constructed to current engineering best practices with regards to resiliency in the event of any anticipated earthquakes.	GCO
Project Roads- General comment about controlling access on exploration roads.	The existing exploration access road (from Highway 37 to the Project site) is controlled at its intersection with Highway 37. The control point comprises a permanently staffed facility where each vehicle movement through the control point is checked and recorded. This level of access control will be maintained throughout the Construction and Operation phases of the Project. Access control will be maintained during the Closure and Post-closure phases, but permanent staffing will be scaled down appropriately.	GCO
,	The existing exploration access road (from Highway 37 to the Project site) is controlled at its intersection with Highway 37. The control point comprises a permanently staffed facility where each vehicle movement through the control point is checked and recorded. This level of access control will be maintained throughout the Construction and Operation phases of the Project. Access control will be maintained during the Closure and Post-closure phases, but permanent staffing will be scaled down appropriately. As per Pretivm's Sustainability Policy, Pretivm aim to preferentially hire qualified personnel from local communities.	GCO
Socio-economic- Gitanyow does not want "socio-economic" data to be lumped into general socio-economic study.	Where possible, the socio-economic study is disaggregated at a community level. However, often information or microdata at a community level is not available and only aggregate data for a larger urban centre, Regional District, region, or province is provided. Consequently, certain information is considered at a broader collection of communities and inferences are made with respect to individual communities when possible. Potential economic effects are assessed in Chapter 19, and potential social effects in Chapter 20.	GHC
Tailings Management- Sub-aqueous deposition of tailings in Brucejack Lake (water contamination).	Brucejack Lake is the proposed site of sub-aqueous waste rock and tailings disposition. Any potential effects on surface water quality from sub-aqueous tailings deposition are predicted to be localized to Brucejack Lake (see Chapter 13, Assessment of Potential Surface Water Quality Effects, for further details). Further, water quality predictions are being modeled for Brucejack Lake and the immediate downstream receiving environment (Chapter 13). The water quality model included tailings/waste rock deposition. The results of the water quality model are predicted to conclude that there will be no change in water quality of downstream receiving waters (Brucejack Creek). Further, all points of discharge will be monitored and mitigated as required by standards outlined in the MMER (MMER; SOR/2002-222) and EMA permits.	GCO

Issue	Pretivm Response*	Issue Raised By
Traditional Knowledge/Use-Concern about "traditional animals and plants."	Concerns regarding "traditional animals and plants," particularly regarding the effects of the Project on those animals and plants, are addressed in Chapter 18, Assessment of Potential Wildlife Effects, and Chapter 16, Assessment of Potential Terrestrial Ecology Effects. "Culturally Important Plants" have been included as a Valued Component (VC) in Chapter 16 and have been assessed separately from other ecosystems. VC's included for assessment in Chapter 18 include those that, among other reasons, are, or were, important to Aboriginal groups for harvesting or spiritual purposes. Potential effects to wildlife include habitat loss/degradation, disruption of movement, sensory disturbances, direct and indirect mortality, and effects from attractants and chemical hazards. Potential effects to culturally important plants include plant habitat loss and degradation (dusting, invasive plants, etc.). Effects to hunting/trapping and plant gathering opportunities and practices, partly as a result of effects to wildlife and culturally important plants, are addressed in Chapter 25 (Current Aboriginal Use). Any Project related effects on country foods are considered minor or negligible. Based on the quantitative screening level risk assessment conducted, limited to no human health risk is expected from consumption of country foods. Calculated hazard quotient for selected contaminants of potential concern were below threshold values, indicating negligible/low project related human health effects due to country foods consumption (see Chapter 21 of the EA for further information).	GCO, GDC
Traffic-Concern about number of trucks and traffic on Highway 37 from a wildlife perspective.	The effects of increased traffic along Highway 37 on moose and grizzly bears are assessed in the Cumulative Effects Assessment section of the Wildlife Effects Assessment chapter (Section 18.9 of Chapter 18, Assessment of Potential Wildlife Effects) in the Application/EIS. Cumulative residual effects on wildlife (Section 18.9.5 of Chapter 18) include: 1) disruption of movement, direct mortality, and indirect mortality for moose; 2) disruption of movement, direct mortality, indirect mortality, and attractants for grizzly bear; 3) sensory disturbance and indirect mortality for mountain goat; 4) attractants for American marten; and, 5) direct mortality and indirect mortality for western toad. An analysis was conducted for each species to characterize the cumulative residual effects, significance, likelihood and confidence (Section 18.9.5 of Chapter 18). The cumulative residual effect of increased traffic along Highway 37 is considered to be not significant. Pretivm is participating in a regional traffic impact study along Hwy 37 being chaired by the BC EAO.	GFA, GHC
Water Quality- General.	Surface Water Quality was screened for inclusion as receptor value component (VC) as result of the scoping process as described in section 6.4.1. (Chapter 6, Assessment Methodology). Concerns regarding surface water quality are addressed in Chapter 13, Assessment of Potential Surface Water Quality Effects. The assessment considered a range of spatial scales from local (i.e., immediately downstream of Brucejack Lake) to regional (i.e., Unuk River at the international border). Identified potential effects to surface water quality include changes to surface water quality due to erosion and sedimentation, metal leaching/Acid Rock Drainage (ML/ARD), nitrogen loading from leaching of blasting residues, dust deposition, planned discharges, groundwater interactions and seepage as well as spills and hazardous waste. Outside the mine site area, any Project related effects on surface water quality are considered minor or negligible (see sections 13.5.1, 13.6.1, Chapter 13, for further information). Within the Mine Site area, water quality effects are expected to be limited to Brucejack Lake, based on predictive water quality modelling as well as qualitative assessment. Active monitoring of near field and far-field receiving environments, as well as water courses adjacent to ancillary Project components, will be designed and executed as to detect any potential changes in water quality as part of the Aquatics Environment Effects Monitoring and Management Program (see Chapter 27, Environmental Management and Monitoring Plans). Adaptive management and mitigation measures will be implemented to manage any potential effects on surface water quality, as required (Chapter 27).	GCO
Water Quality- Mine seepage contaminating surrounding and downstream water.	Water quality predictions were modeled for Brucejack Lake and the immediate downstream receiving environment (Chapter 13, Assessment of Potential Surface Water Quality Effects). The water quality model included groundwater seepage/interactions as well as waste rock and tailings deposition. The results of the water quality model conclude that there will be no change in water quality of downstream receiving waters (Brucejack Creek) and no effects on water quality on surrounding waters from seepage. Therefore, no water quality changes are predicted to occur in surrounding, mid or far field-receiving environments (Section 13.5.2 and 13.5.3, Chapter 13).	Gitksan Watershed Authorities

#### Appendix H. Métis and Non-Section 11 Order Aboriginal Groups Issues Tracking Table (until March 31, 2014)

Issue	Pretivm Response*	Issue Raised By
Wildlife- Consider Banff-style wildlife crossings	Mitigations such as wildlife crossings and management of the highways are outside of the scope of the EA, and falls under the	GHC
(assuming Hwy 37 but not clear).	jurisdiction of the BC Ministry of Transportation.	
Wildlife- Effects of transportation on wildlife	The effects of increased traffic along Highway 37 on moose and grizzly bears are assessed in the Cumulative Effects	GCO, GDC
(unspecified).	Assessment section of the Wildlife Effects Assessment chapter (Section 18.9 of Chapter 18, Assessment of Potential Wildlife	
	Effects) in the Application/EIS. Cumulative residual effects on wildlife (Section 18.9.5 of Chapter 18) include: 1) disruption of	
	movement, direct mortality, and indirect mortality for moose; 2) disruption of movement, direct mortality, indirect mortality,	
	and attractants for grizzly bear; 3) sensory disturbance and indirect mortality for mountain goat; 4) attractants for American	
	marten; and, 5) direct mortality and indirect mortality for western toad. An analysis was conducted for each species to	
	characterize the cumulative residual effects, significance, likelihood and confidence (Section 18.9.5 of Chapter 18). The	
	cumulative residual effect of increased traffic along Highway 37 is considered to be not significant.	

<sup>\*</sup>NOTE: Responses are currently in draft form and will be updated for inclusion in the final issues tracking tables that will appended to the Information Distribution and Consultation Chapter of the Application/EIS. Numerical references to specific chapters and/or sections of the Application/EIS are likely to change.

#### References

2002a. Environmental Assessment Act, RSBC. C. 43.

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## Appendix I

Feedback and Responses on Draft Pre-Application Aboriginal Consultation Report

BRUCEJACK GOLD MINE PROJECT

**Pre-Application Aboriginal Consultation Report** 

Appendix I. Feedback and Responses on Draft Pre-Application Aboriginal Consultation Report\*

Comment #	Reviewer	Date	Report Section	Comment	Pretivm Response
1	Skii km Lax Ha	14-May-14	Appendix E	Skii km Lax Ha looks forward to the workshop Pretivm proposed to hold with Skii km Lax Ha on the interpretation of the impact on use of land and impact to rights. Skii km Lax Ha notes that this meeting should take place prior to submission of the EAC Application.	On May 7, 2014 Pretivm provided Skii km Lax Ha with a memo summarizing draft results of the assessment of potential effects of the Project on Skii km Lax Ha rights and interests. Discussions over email between Pretivm and Skii km Lax Ha ensued and on May 14, 2014 the two parties met. The purpose of the meeting was for Pretivm to provide a Project update as well as to discuss feedback from Skii km Lax Ha. Another meeting is currently being arranged to discuss further.
2	Skii km Lax Ha	14-May-14	Appendix E	Skii km Lax Ha looks forward to the workshop Pretivm proposed to hold with Skii km Lax Ha on proposed mitigations. Skii km Lax Ha notes that this meeting should take place prior to submission of the EAC Application.	See response to comment 1.
3	Skii km Lax Ha	14-May-14	Appendix E	Skii km Lax Ha looks forward to reviewing Chapter 26 of the Application/EIS, Asserted or Established Aboriginal Rights and Interests.	Comment noted. On May 7, 2014 Pretivm provided Skii km Lax Ha with a memo summarizing draft results of the assessment of potential effects of the Project on Skii km Lax Ha rights and interests. Discussions over email between Pretivm and Skii km Lax Ha ensued and on May 14, 2014 the two parties met. The purpose of the meeting was for Pretivm to provide a Project update as well as to discuss feedback from Skii km Lax Ha. The Application/EIS will be made available to Skii km Lax Ha via the Working Group during the screening review.
4	Skii km Lax Ha	14-May-14	Appendix E	Skii km Lax Ha regards all of its TK/TLU information as proprietary, especially information about its relationships to land and resources that is represented and displayed on maps. SKLH requests that Pretivm not include Skii km Lax Ha maps supplied to them in public submissions.	Pretivm followed up with Skii km Lax Ha to discuss this comment. Skii km Lax Ha confirmed the maps, with some revisions (which were made), and the TK report can be included/appended to the Application/EIS.
5	Skii km Lax Ha	14-May-14	Appendix E	Skii km Lx Ha wishes to continue to have input into environmental mitigation and management plans (EEMPs).	Skii km Lax Ha will have the opportunity to review EMMPs via its participation in the Working Group.

<sup>\*</sup> NOTE: This table only tracks feedback received from Aboriginal groups and Nisga'a Nation (in this case, only Skii km Lax Ha) on a draft version of the Pre-Application Aboriginal Consultation Report and Pretivm's responses to the feedback. A full record of Pretivm's engagement with Skii km Lax Ha, Tahltan Nation, and Nisga'a Nation to elicit feedback on this report is included in the communication summary tables for each Aboriginal group, which will be appended to Chapter 3, Information Distribution and Consultation, of the Application/EIS. A paragraph summarizing Pretivm's consultation efforts with the three Aboriginal groups is included on page 1-5 of the main report.