

Harrison2, Lucy (IAAC/AEIC)

From: Crampton, Stefan (IAAC/AEIC)
Sent: February 4, 2020 4:40 PM
To: 'Baines David SPO'
Subject: RE: Early Draft of FRO Castle IPD and EEP

Categories: Done

Hi Dave,

The Impact Assessment Agency of Canada has reviewed the draft initial Project Description that Teck Coal Ltd. shared on January 16, 2020, with the goal of providing advice on whether the Castle Project (the Project) is likely to include a physical activity described in the *Physical Activities Regulations* (the Regulations) made pursuant to the *Impact Assessment Act* (2019). Upon review of your document, additional information is required in order to provide advice as to whether the Project meets the 50% threshold described in the Regulations.

As you are aware, item 19(a) in the Schedule to the Regulations reads as follows:

“The expansion of an existing mine, mill, quarry or sand or gravel pit in one of the following circumstances: in the case of an existing coal mine, if the expansion would result in an increase in the area of mining operations of 50% or more and the total production capacity would be 5 000 t/day or more after the expansion”.

The Regulations define the term “area of mining operations” as “the area at ground level occupied by any open-pit or underground workings, mill complex or storage area for overburden, waste rock, tailings or ore”. The calculation of increase in area of mining operations must look at the change in area of these components only. Depending on project-specific circumstances, this may include components of the existing mine that are under construction, constructed but not in operation, in operation, in the process of being decommissioned, or in care and maintenance. It may also include components for which regulatory approvals have been issued but construction has not yet started.

It appears as though the calculations utilized by Teck to calculate increase in area of mining operations for the Project looked at the total area of new disturbance, and compared it to the existing area permitted for mining operations by the Fording River Operations mine permit. Indeed, page 10 of the document states: “The Conceptual Project Footprint discussed in Section 4.1 suggests that the Project would require approximately 2,550 ha outside of the current FRO Mines Act C-3 Permit Boundary”. Footnote 6 on the same page notes that the “The FRO Mines Act C-3 boundary encompasses an area of 6,933 ha”. This approach is also clearly outlined in Table 11 on page 36, concluding that the Project would result in an expansion of + 36.5%.

Required Information: Provide revised calculations for increase in area of mining operations associated with the Project, utilizing only the components captured by the definition in the Regulations (see above). To calculate the increase in the area of mining operations, determine the area occupied by the components of the existing mine that are listed in the definition, determine the area of mining operations that would result from the proposed expansion, and then compare the two to estimate the percentage increase. The areas should be calculated on a two-dimensional basis.

It may be useful to tabulate the size of each of these components for the existing mine, and compare them to the size of the components that meet this definition associated with the Castle Project, to provide clarity in these calculations.

Should you require additional details regarding the above, please do not hesitate to contact me at the contact information below.

Thank you,

Stefan Crampton

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From: Baines David SPO <David.Baines@teck.com>

Sent: January 16, 2020 9:25 AM

To: Crampton, Stefan (IAAC/AEIC) <stefan.crampton@canada.ca>

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Subject: Early Draft of FRO Castle IPD and EEP

Stephan,

Thanks for the call yesterday. As discussed, I have sent you a OneNote link to an early draft version of the Fording River Operations Castle Project Initial Project Description and Early Engagement Plan. This is the same version that Teck shared with the KNC on December 18th 2019 and with EAO on January 7th 2020. This draft was developed prior to October 2019 to provide time for reviews prior to sharing externally.

Teck is sharing these documents with IAAC for information purposes and to help future conversations between IAAC and Teck. Please treat the documents as business confidential.

Teck anticipates changes to these documents based on:

- Official EAO guidance published on December 16, 2019 (after the document was written)
- Feedback from EAO and KNC anticipated by the end of January 2020.

I welcome any and all feedback from IAAC on these documents. Let me know if you have any questions or concerns about the documents (or the OneDrive message doesn't come through).

All the best,

Dave

Dave Baines

Senior Lead Regulatory Approvals
Teck Resources Limited

<personal information removed>