



File: ENVA-30200-20/LAWGOL 05 02

Reference: 418109

November 5, 2025

SENT VIA EMAIL

Terence Hubbard
President, Impact Assessment Agency of Canada
22nd floor, Place Bell, 160 Elgin Street
Ottawa ON K1A 0H3
Terence.Hubbard@iaac-aeic.gc.ca

Dear Terence Hubbard:

I am writing to request substitution pursuant to the *Impact Assessment Act* (IAA) and in accordance with the Impact Assessment Cooperation Agreement Between Canada and British Columbia (B.C.) (the Cooperation Agreement) for the proposed Lawyers-Ranch Project (the Project). Thesis Gold Inc. (Thesis) proposes to construct and operate a gold-silver mining project that would mine five million tonnes of ore over a 14-20 year mine life. Thesis is located approximately 275 km north-east of Smithers, B.C., situated on Crown land.

On November 3, 2025, the Environmental Assessment Office (EAO) received the Initial Project Description for the Project. The Project, as a new mineral mine facility, meets the thresholds that require environmental assessment under the *Environmental Assessment Act* (2018) (the EA Act) Reviewable Projects Regulation, as its proposed production capacity exceeds 75,000 tonnes per year of mineral ore during operations.

I understand that Impact Assessment Agency of Canada (IAAC) also received an Initial Project Description for the Project on November 3, 2025, and that the Project is expected to meet the definition of a designated project under the IAA's Physical Activities Regulations. Those criteria are:

- Section 18 the construction, operation, decommissioning and abandonment of the following:

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- (c) a new metal mine with an ore production capacity of 5,000 tonnes per day or more; and
- (d) a new metal mill with an ore input capacity of 5,000 tonnes per day or more.

Coordination with the Impact Assessment Agency of Canada

I have been informed that the EAO and IAAC intend to jointly begin engagement with Indigenous peoples and the public shortly. In accordance with the Cooperation Agreement, I am submitting this request for substitution at this time to allow IAAC to consult the public and Indigenous peoples on the substitution request as part of the planned comment period. I understand that later in the planning phase, IAAC will decide whether a further impact assessment is required, and following that, the federal Minister of Environment and Climate Change (the Minister) will respond to this request for substitution.

As per the Cooperation Agreement, the EAO has been working closely with IAAC on a joint process for the EAO's Early Engagement and IAAC's Planning phase. This coordinated engagement helps facilitate a common process and seeks to issue joint documents where possible. The EAO is committed to this cooperative approach with IAAC throughout the review of the Project, and to collaborating on measures that meet our shared goals of maintaining strong environmental and social standards, supporting reconciliation with Indigenous peoples, and improving efficiency through eliminating duplication and improving decision timelines.

If substitution is approved by the Minister, the EAO commits to meet the legislative requirements of both Canada and B.C. and fulfil the conditions for substitution under the IAA set out in Section 7 of the Cooperation Agreement and any conditions the Minister may establish. The EAO will take into account the factors set out under subsection 22(1) of the IAA and fully assess the effects to areas of federal jurisdiction as defined in Section 2 of the IAA, when conducting the assessment and providing an Assessment Report with findings and conclusions to the Minister.

During the assessment, the EAO would seek, manage, and rely on the advice of members of the Technical Advisory Committee, including representatives from federal authorities, in establishing information requirements for the assessment, assessing the potential effects of the Project and assessing the adequacy of any proposed mitigation measures.

Conclusion and Next Steps

In accordance with the provisions of the IAA and the Cooperation Agreement, the

EAO requests that the Minister approve the substitution of B.C.'s assessment process for the Project, should a further federal impact assessment be required under the IAA.

Additionally, if the Minister approves the substitution request, consultation with Indigenous peoples, federal authorities, and engagement with the public will be carried out by the EAO in accordance with the Cooperation Agreement and the EA Act. The EAO will work with IAAC to coordinate engagement with Indigenous peoples. The EAO will also work with IAAC on the preparation of a permitting plan, including federal requirements, for the Project.

I look forward to hearing from you as soon as possible regarding the Minister's decision on this request for substitution.

Sincerely,

<Original signed by>

Alex MacLennan
Chief Executive Assessment Officer and Associate Deputy Minister
Environmental Assessment Office

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