

Federal Authority Advice Record (FAAR)**FAAR Response must be submitted by February 3, 2026**

Lawyers-Ranch Project- Thesis Gold Inc. (proponent)

Registry File: 90103

Department/Agency	Health Canada (HC)
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1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

No

As relevant,

- a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required
 - b) Describe any associated Indigenous or public consultation, including timelines
 - c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required
 - d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide.
 - e) Indicate whether your department or agency has identified any power that it will not be exercising or may not be able to exercise to allow the project to be carried out, in whole or in part.
2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate¹ and the information in your possession, including the Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects of the project. For each key issue:
 - a) Specify the key issue (e.g., specific species and location)
 - b) Specify the project component or activity linked to the key issue

¹ Refer to the [Memoranda of Understanding with IAAC](#).

- c) Explain why it's a key issue based on:
 - i. biophysical effect pathway(s) from the specific project component or activity
 - ii. concern unique to the project or a priority within your mandate
 - iii. the issue being material² to decision making under the *Impact Assessment Act*
- d) Identify how the issue could be resolved, including through means other than an impact assessment
- e) Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

Lucille Lukey
Acting Regional Manager –
Environmental Health
Program
January 22, 2026

Name and title of
Departmental / Agency
Responder

² An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest

Table 1: Key Issues to inform the impact assessment process

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines/Application Information Requirements in a substituted assessment.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*.

Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	b) Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<p>Identify comments by organization and comment number.</p> <p>e.g.: IAAC-01</p>	<p>Specify the key issue (e.g., specific species and location).</p>	<p>Identify the project component or activity linked to the key issue.</p> <p>Be specific about the nature, scale, novelty and complexity or the component or activity.</p>	<p>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</p> <p>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</p>	<p>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</p>	<p>Describe why the key issue is material to decision-making as either:</p> <ul style="list-style-type: none"> an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including: <ul style="list-style-type: none"> federal experts' knowledge and experience with past project assessments; presence of sensitive species, habitats or human receptors (including Indigenous Peoples); novel or complex project activities, components or technologies; high uncertainties in effects or in the effectiveness of mitigation measures; unknown or unproven mitigation; or a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples. 	<p>Describe how the key issue could be resolved or addressed by:</p> <ul style="list-style-type: none"> Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has; Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province; Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or Commitments made by the proponent (e.g., in the Initial Project Description). 	<p>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</p> <p>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</p>
HC-01	Potential exposure of Indigenous peoples (during traditional activities and as off-duty	Activities throughout the life of the Project (e.g., construction and operations) will potentially emit and discharge contaminants into the environment where Indigenous	Project emissions could result in Indigenous peoples being exposed to COPCs through contact with environmental media (e.g., traditional foods, air, water, soil, sediment).	Under the <i>Impact Assessment Act</i> (IAA), Health Canada (HC) provides expert information and knowledge to support the	As per IAA Sections 2(e) and 2(f), adverse effects on the health of Indigenous peoples related to the Project falls within federal jurisdiction. The Initial Project Description (IPD) describes that the Project partially overlaps with traditional territories of Kwadacha Nation, Tsay	The IPD includes a commitment to assess and mitigate potential Project-related effects on valued components (VCs) such as Air Quality, Acoustics, and Indigenous Nations Culture, Interests, and Rights (Table 9-2). While some VCs may include aspects of human	1. The IPD indicates a Detailed Project Description (DPD) is contemplated. To assist HC in providing tailored advice, HC recommends the DPD include the distances of seasonal and permanent residences (in km) from any Project components. A map could also be used to show this information.

	<p>workers) to contaminants of potential concern (COPCs)</p>	<p>peoples may be exposed.</p> <p>Sources of Project-related emissions and discharges (COPCs not yet identified) include, but are not limited to, tailings, waste rock and ore storage areas, roads, diesel and gasoline engines, and Project-related activities such as blasting, digging and ore processing.</p>	<p>Examples of potential exposure routes include:</p> <ul style="list-style-type: none"> • Inhalation of COPCs in air contaminated via combustion, ore processing and/or dust. • Ingestion of COPCs in traditional foods contaminated via uptake of COPCs from Project-impacted water, soil and/or sediment. 	<p>assessment of impacts on Indigenous health.</p> <p>Potential exposure of Indigenous peoples to COPCs is commonly observed with mining projects and will be applicable to this Project.</p>	<p>Keh Dene Nation, Takla Nation, and Tahltan Nation. The closest Indigenous community of Kwadacha Nation is approximately 99 km east of the Project.</p> <p>The Project is in close proximity to provincial parks (approximately 1.5 km), and the area around the Project may be used for hunting, trapping, fishing and other recreational activities. Historical land uses by multiple First Nations are known to occur near the Lawyers property of the Project area. The IPD outlines a list of tenure and land holders that could be impacted by the Project (e.g., traplines, outfitters, recreation tenure, First Nations tenure).</p> <p>The potentially impacted First Nations have raised concerns and comments including but not limited to, potential impacts on hunting areas and culturally sensitive areas and cumulative impacts.</p>	<p>health, the IPD does not have a standalone Human Health VC where health-related effects associated with other VCs can be integrated and assessed collectively.</p> <p>The IPD also does not appear to have described potential mitigation measures related to human health. In order to understand the overall Project-related impacts on the health of Indigenous peoples, HC recommends that a Human Health Risk Assessment (HHRA) of potential Project impacts be undertaken as part of the Application. The results of the HHRA can also inform necessary Project-specific mitigation and monitoring measures.</p> <p>HC guidance can be found on IAAC's website (specifically the "Technical Considerations and References for the Preparation of Impacts Statement" page under Human Health).</p>	<p>Differentiate Indigenous from non-Indigenous residents where possible.</p> <ol style="list-style-type: none"> 2. To address the issue of contaminant exposure, HC recommends that an HHRA be undertaken. An HHRA can be used to identify relevant COPCs and exposure pathways and estimate the likelihood and severity of adverse health effects. 3. In addition to baseline contaminant levels in vegetation tissue that are already collected (IPD, Appendix B, PDF pp. 113-116), HC recommends that baseline levels in traditional foods commonly consumed by impacted Indigenous Peoples be collected and included as part of the HHRA. 4. The IPD includes a commitment to collaborate closely with Indigenous Nations. In keeping with this commitment, the collection of appropriate data for the HHRA through Indigenous engagement (where relevant) is recommended.
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Please insert additional rows as necessary.