



BRUCEJACK MINE
2023 CEAA Annual Report

March 2024

 **Newmont**[™]

PRETIUM RESOURCES INC.

A wholly-owned indirect subsidiary of Newmont Corporation



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BRUCEJACK MINE **2023 CEAA Annual Report**

Date: March 2024

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EXECUTIVE SUMMARY

Pretium Resources Inc. (Pretium) a wholly owned indirect subsidiary of Newmont Corporation (Newmont) received the Canadian Environmental Minister's Decision Statement on July 30, 2015 for the Brucejack Mine, an underground gold mine located 65 km north of Stewart, British Columbia (BC). Construction activities commenced on September 5, 2015, with commercial operation achieved on July 1, 2017. 2023 was the sixth full calendar year of gold production.

Pursuant to Condition 10 of the Decision Statement, the Implementation Schedule was provided to the Nisga'a Nation, Tahltan Nation, Tsetsaut/Skii km Lax Ha, and the Canadian Environmental Assessment Agency (CEAA) in August 2015, with updates on February 24, 2017, March 13, 2019, March 29, 2021, and March 12, 2023.

At the mine site, fish and fish habitat protection during 2023 continued to be achieved through use of the water treatment plant and three turbidity curtains at the outlet of Brucejack Lake. Tailings were generated in 2023 and deposited as a thickened slurry on the bottom of the Waste Rock and Tailings Storage Facility (WRTSF). Waste rock from underground activities in 2023 was deposited subaqueously into the WRTSF. Effluent monitoring continued as per BC *Environmental Management Act* Permit 107835 and the Metal and Diamond Mining Effluent Regulations (MDMER). The MDMER Second Biological Monitoring Study Plan was filed with Environment and Climate Change Canada on February 3, 2020. Field sampling for the MDMER Second Biological Monitoring Study was completed in August 2020. The Brucejack Mine MDMER Environmental Effects Monitoring (EEM) Second Interpretive Report was submitted on July 12, 2021. Environment and Climate Change Canada (ECCC) provided comments on the Second Interpretive Report in January 2022. Pretium submitted an Addendum and Response to ECCC with comments on March 13, 2023. The MDMER Third Biological Monitoring Study Design was submitted to ECCC on March 14, 2023, and final report will be submitted in July 2024.

To protect western toad (*Anaxyrus boreas*) during migration, five toad tunnels and a modified bridge were installed along the Brucejack Access Road in 2016 and 2017. Toad use of the tunnels and the modified bridge was monitored with remote trail cameras and ground surveys in 2023 between July 15 and September 29. Monitoring surveys have now been conducted for toadlet migration periods over the last eight years.

Air quality management during 2023 focused on measures to reduce fugitive dust. Tsetsaut/Skii km Lax Ha relocated their lodge in 2017; monitoring of air quality has continued at the new lodge location. The 2023 air quality report on monitoring at the lodge will be sent to Nisga'a Nation and Tsetsaut/Skii km Lax Ha in March, 2024.

Pretium continued to maintain a security gate at the start of the Brucejack Access Road during 2023. The "No Hunting, No Fishing, No Trapping Policy" remained in place. Screening for firearms and fishing equipment continued at the security facility located at km 1 of the Brucejack Access Road.

Measures to protect wildlife along the Brucejack Access Road are enhanced by posting wildlife related signage, including for toad tunnels locations and speed limits; through education programs; and by reducing high snowbanks at intervals along the road. Reducing high snowbanks allows large ungulates the opportunity to escape rather than being trapped on the road and potentially endangered by vehicle traffic.

No archaeological sites were discovered during 2023 activities.

Record keeping continued during 2023 using the systems established in 2015.

Pretium consulted with the Nisga'a Nation, Tahltan Nation and Tsetsaut/Skii km Lax Ha during 2023. This occurred through the BC Environmental Assessment Office, BC Ministry of Environment and Climate Change Strategy, BC Ministry of Energy, Mines and Low Carbon Innovation, and BC Ministry of Forests for applications to amend Effluent Discharge Permit 107835, Environmental Assessment Certificate #M15-01, and Mines Act Permit M-243. Effluent Discharge Permit 107835 was amended to allow discharge from a third Filterboxx C75 wastewater treatment unit, while amendments to EAC #M15-01 and Mines Act Permit M-243 were associated with expansions of the Certified Project Description boundary and Permitted Mine Area boundary, respectively. Air Permit 107025 has been under review and amendment is to follow in 2024. During 2023, Pretium environmental department met three times with the Nisga'a Nation to share information on mine operations and authorization related matters. In 2023, Pretium social performance department had over sixty plus engagements with the Nisga'a Nation, Tahltan, and Tsetsaut/Skii km Lax Ha members, which comprised community events, meetings, career fairs, recruitment sprints and attendance at cultural celebrations. Consultation with Aboriginal groups also occurred through referral of other applications and reports, including:

- 2022 Economic and Social Effects Mitigation Plan (ESEMP) Annual Report;
- 2022 Annual Report for *Mines Act* Permit M-243 and *Environmental Management Act* Permits PE-107835 and PA-107025;
- 2022 CEAA Annual Report;
- 2022 air quality monitoring results for the Tsetsaut/Skii km Lax Ha lodge;
- 2022 Brucejack Access Road SUP S25923 Maintenance Plan and Works Summary; and
- via the Wildlife Advisory Committee annual meeting, including through distribution of meeting materials requested by committee members.

Pretium worked closely with local and regional communities during 2023 to provide information and to maximize benefits associated with employment, training, and business opportunities. Pretium is in regular contact with employment representatives from Aboriginal groups to communicate job postings, provide information about required skills and experience, and organize recruitment events. Pretium continues to work with Aboriginal groups to identify training needs and opportunities, as well as opportunities for Aboriginal owned businesses to provide goods and services. As of December 2023, Pretium's workforce at the mine totalled 1,201 people, including 741 people employed directly by Pretium and 460 employed through contractors. Procon, with 355 people employed at the mine, is the single largest contractor and responsible for underground mining. Of Pretium's direct hires, 42% resided in northwest BC and 28% self-identified as Aboriginal.

RESUME

Le 30 juillet 2015, Pretium Resources Inc. (Pretium) une filiale indirecte à part entière de la Newmont Corporation (Newmont), la déclaration de décision de la ministre de l'Environnement du Canada relativement au projet de mine Brucejack, une mine d'or souterraine située à 65 km au nord de Stewart en Colombie-Britannique (C.-B.). Les travaux de construction ont débuté le 5 septembre 2015 et l'exploitation commerciale a débuté le 1^{er} juillet 2017. L'année 2023 est donc la sixième année civile complète de production d'or pour cette mine.

Conformément à la Condition 10 de la déclaration de décision, le calendrier de mise en œuvre a été remis à la nation Nisga'a, la nation Tahltan, la nation Tsetsaut/Skii km Lax Ha et l'Agence canadienne d'évaluation environnementale (ACEE) en août 2015, avec des mises à jour le 24 février 2017, le 13 mars 2019, le 29 mars 2021, et le 12 mars 2023.

Sur le site de la mine, la protection du poisson et de l'habitat du poisson a continué d'être assurée en 2023 par l'usine de traitement des eaux de l'exploitation et par les trois rideaux de confinement installés au point de décharge du lac l'Installation d'entreposage des stériles et des résidus (IESR). Les résidus produits en 2023 ont été déposés sous forme de boues épaisses au fond du lac IESR. Les roches stériles (en quantité très limitée) provenant du développement en surface et des travaux souterrains en 2022 ont été placées dans les eaux du lac Brucejack. La surveillance des effluents s'est poursuivie en vertu du permis 107835 de l'*Environmental Management Act* de la C.-B. et du *Règlement sur les effluents des mines de métaux et des mines de diamants* (REMM). Le plan pour la deuxième étude de suivi biologique en vertu du REMM a été déposé auprès d'Environnement et Changement climatique Canada le 3 février 2020. Les travaux d'échantillonnage sur le terrain pour la deuxième étude de suivi biologique en vertu du REMM ont été complétés en août 2020. Le deuxième rapport d'interprétation de la surveillance des effets environnementaux (SEE) à la mine Brucejack en vertu du REMM a été soumis le 12 juillet 2021. Environnement et Changement climatique Canada (ECCC) a fourni des commentaires sur le deuxième rapport d'interprétation en janvier 2022. Pretium a soumis un addendum et réponses aux commentaires d'ECCC en mars 2023. La conception de la troisième étude de surveillance biologique du MDMER a été soumise à ECCC le 14 mars 2022 et le rapport final sera soumis en juillet 2024.

Afin de protéger le crapaud de l'Ouest (*Anaxyrus boreas*) durant sa migration, cinq tunnels à amphibiens et un pont modifié ont été aménagés le long de la route d'accès Brucejack en 2016 et en 2017. L'utilisation des tunnels et du pont par les amphibiens a été surveillée en 2023 à l'aide de caméras de suivi à distance et de relevés de terrain entre le 15 juin et le 29 juillet et entre le 5 septembre et le 29 septembre. Des enquêtes de suivi pour les périodes de migration des jeunes crapauds ont été réalisées chaque année depuis maintenant huit ans.

La gestion de la qualité de l'air en 2023 était axée sur des mesures visant à réduire les poussières diffuses. La nation Tsetsaut/Skii km Lax Ha a déplacé son pavillon en 2017 et la surveillance de la qualité de l'air se poursuit au nouvel emplacement. Le rapport sur la qualité de l'air de 2023 concernant la surveillance au chalet sera envoyé à la Nation Nisga'a et à Tsetsaut/Skii km Lax Ha en mars 2024.

Pretium a maintenu une barrière de sécurité à l'entrée de la route d'accès Brucejack durant l'année 2023. La consigne 'Interdiction de chasser, de pêcher et de piéger' reste en vigueur. L'examen visant à déceler toute arme à feu et tout matériel de pêche s'est poursuivi au point de sécurité situé au kilomètre 1 de la route d'accès.

Les mesures de protection de la faune tout au long de la route d'accès Brucejack ont été renforcées par l'ajout de panneaux d'information sur la faune, incluant l'emplacement des tunnels à amphibiens et les limites de vitesse, par la mise en œuvre de programmes d'éducation et par la réduction à intervalles réguliers des bancs de neige élevés le long de la route. Réduire les bancs de neige élevés permet notamment aux grands ongulés de fuir plutôt que de rester piégés sur la route et potentiellement mis en danger par la circulation des véhicules.

Aucun site archéologique n'a été découvert durant les activités de 2023.

L'enregistrement des données s'est poursuivi en 2023 suivant les systèmes établis en 2015.

Tout au long de l'année 2023 Pretium a consulté les représentants des nations Nisga'a, Tahltan et Tsetsaut/Skii km Lax Ha. Ces consultations ont eu lieu par l'entremise du BC Environmental Assessment Office (Bureau d'évaluation environnementale de la C.-B.), du BC Ministry of Environment and Climate Change StratBC Eney (Ministère de l'environnement et de la stratégie en changement climatique de la C.-B., du Ministère de l'énergie, des mines, et des innovations à faibles émissions de carbone), et du BC Ministry of Forests, de la C.-B. dans le cadre de demandes de modification du permis 107835 relatif aux rejet d'effluente, du certificat d'évaluation environnementale M15-01, et du permis M-243 délivré en vertu de la *Loi sur les mines*. Le permis 107835 relatif aux rejet d'effluente a été modifiée pour permettre la décharge d'un troisième unité de traitement des eaux usées Filterboxx C75, alors que les demandes de modification du certificat d'évaluation environnementale M15-01 et du permis M-243 délivré en vertu de la *Loi sur les mines* ont été associés à des extensions de la limite de la description de projet certifiée et de la limite de la zone minière autorisée, respectivement. Le permis d'air 107025 a fait l'objet d'un examen, et des modifications sont prévues en 2024. En 2023, le département environnemental de Pretium s'est réuni trois fois avec la Nation Nisga'a pour partager des informations sur les opérations minières et les questions liées aux autorisations. En 2023, le département des performances sociales de Pretium a réalisé plus de soixante engagements avec la Nation Nisga'a, les Tahltan, ainsi que les membres de Tsetsaut/Skii km Lax Ha. Ces engagements comprenaient des événements communautaires, des réunions, des salons de l'emploi, des opérations de recrutement et la participation à des célébrations culturelles. Les réuni deux fois en 2022. Les groupes autochtones ont également été consultés par le biais d'autres demandes et rapports, y compris:

- le rapport annuel 2022 sur le Plan d'atténuation des effets économiques et sociaux (PAEES) ;
- le rapport annuel 2022 pour le permis M-243 délivré en vertu de la *Loi sur les mines* et les permis PE-107835 et PA-107025 délivrés en vertu de l'*Environmental Assessment Act* ;
- le rapport annuel ACEE 2021 ;
- le rapport 2022 des résultats de la surveillance de la qualité de l'air pour le pavillon Tsetsaut/Skii km Lax Ha ;
- le Plan d'entretien et résumé des travaux en 2022 pour route d'accès Brucejack en vertu du permis d'utilisation spéciale S25923 ; et lors de la réunion annuelle du Wildlife Advisory Committee (Comité consultatif sur la faune), y compris par la distribution de documents de réunion demandés par les membres du comité.

Pretium a collaboré étroitement avec les communautés locales et régionales au cours de l'année 2023 afin de fournir des informations et de maximiser les avantages liés à l'emploi, à la formation et aux opportunités commerciales. Pretium communique régulièrement avec les représentants responsables de l'emploi des groupes autochtones pour leur transmettre des offres d'emploi, les informer sur les compétences et l'expérience requises, et pour organiser des activités de recrutement. Pretium

continue de travailler avec les groupes autochtones afin d'établir les besoins et les occasions de formation et de voir comment les entreprises de différents groupes autochtones pourraient offrir leurs biens et services. Au décembre 2023, le personnel de Pretium à la mine comprenait 1201 travailleurs, incluant 741 employés directs et 741 sous-traitants. Procon est le plus gros sous-traitant avec 355 personnes employées à la mine et responsables des travaux souterrains. Parmi les employés directs de Pretium, 42 % sont originaires du nord-ouest de la C.-B. et 28 % ont déclaré être Autochtones.

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Appendix A Brucejack Mine Project: Implementation Activities Undertaken (as per CEAA
Decision Statement Condition 2.5.1)

GLOSSARY AND ABBREVIATIONS

AEMP	Aquatic Effects Monitoring Plan
BC	British Columbia
CO	Carbon Monoxide
EAC	BC Environmental Assessment Certificate
ECCC	Environment and Climate Change Canada
EEM	Environmental Effects Monitoring
EMS	Environmental Management System
IBA	Impact Benefit Agreement
L3 OF	Reference point Lake 3 Outfall
MDMER	Metal and Diamond Mining Effluent Regulations (SOR/2002-222)
MERS	Mine Effluent Reporting System
NO₂	Nitrogen dioxide
PASS	Passive Air Sampling System
PM_{2.5}	Particulate matter size less than 2.5 microns diameter
PM₁₀	Particulate matter size less than 10 microns diameter
Pretium	Pretium Resources Inc. (Pretium) a wholly-owned indirect subsidiary of Newmont Corporation (Newmont)
SO₂	Sulphur dioxide
SOP	Standard operating procedure
QA/QC	Quality assurance/quality control
WMP	Wildlife Management Plan

1 INTRODUCTION

The Brucejack Mine is an underground gold-silver mine located approximately 65 km north of Stewart, British Columbia (BC) (Figure 1). Current permitted production totals 18.5 million tonnes of mineralized material at an average annual rate of 1,387,000 tonnes on a calendar year basis, i.e., an average rate of approximately 3,800 tonnes per day over a minimum 14-year mine life.

Pretium Resources Inc. (Pretium) received a BC Environmental Assessment Certificate (EAC #M15-01) on March 26, 2015 and a *Canadian Environmental Assessment Act, 2012* Minister's Decision Statement, issued under Section 54, on July 30, 2015. All the provincial and federal permits required to construct, operate, and decommission the mine have been received. Surface construction activities began at the Brucejack Mine site on September 5, 2015, and commercial production was achieved on July 1, 2017. 2023 was the sixth full calendar year of gold production.

This report has been developed to meet Decision Statement Condition 2.5: “the Proponent shall, from the reporting year where construction starts, submit to the Agency an annual report.” The report is structured such that each heading addresses an annual reporting requirement as defined within the subheadings of Condition 2.5.

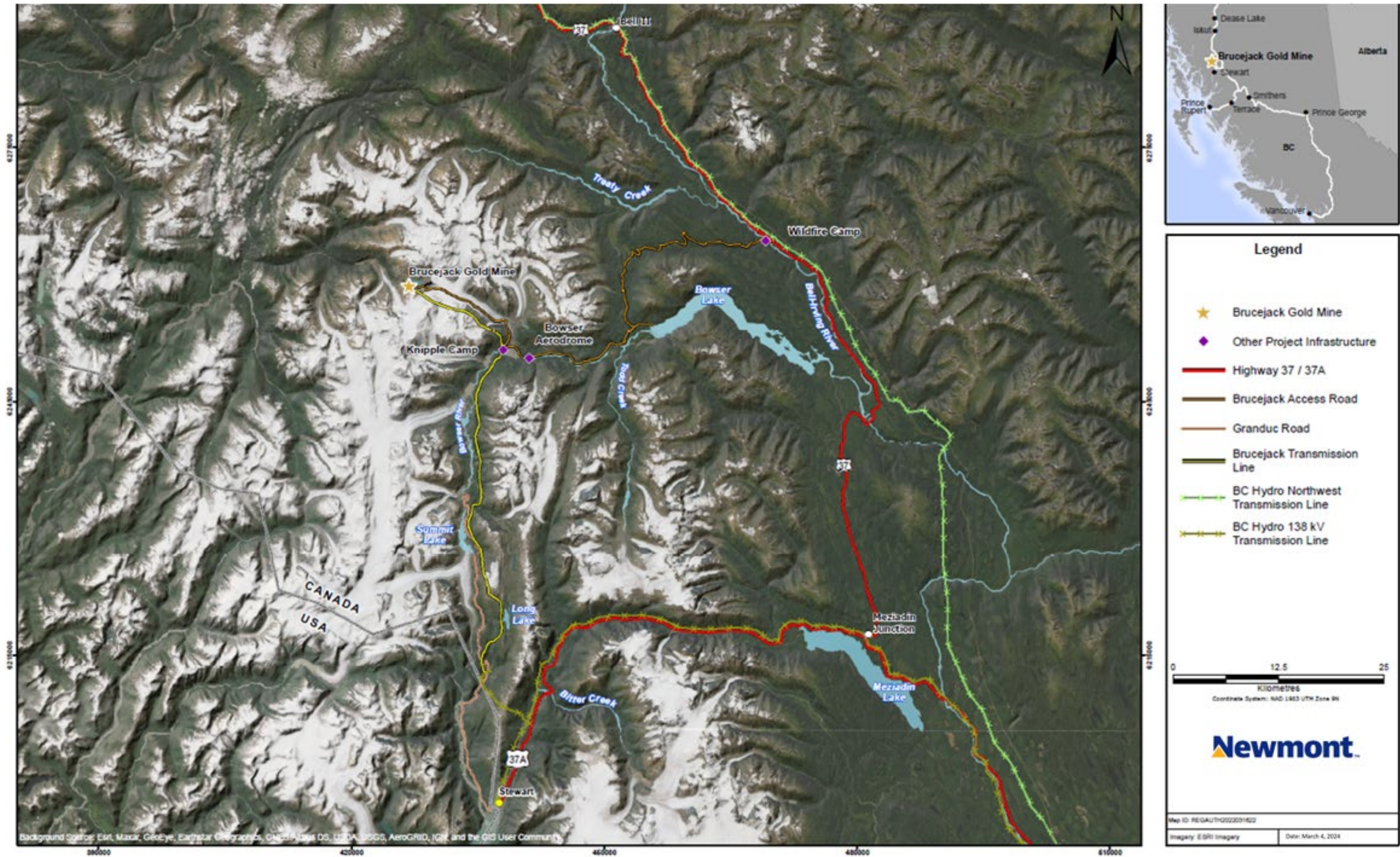


Figure 1: Brucejack Mine Location Map

2 CONDITION 2.5.1: UPDATE ON IMPLEMENTATION OF DECISION STATEMENT CONDITIONS

Condition 2.5.1: The proponent shall document in the annual report implementation activities undertaken in the reporting year for each of the conditions set out in this Decision Statement.

Refer to Appendix A for the table titled *Brucejack Mine Project: Implementation Activities Undertaken (as per CEAA Decision Statement Condition 2.5.1)* for a compilation of implementation activities that took place during 2023.

3 **CONDITION 2.5.2: INFORMED TECHNOLOGY AND KNOWLEDGE**

Condition 2.5.2: The proponent shall document in the annual report how it has considered and incorporated the factors set out in condition 2.1 in the implementation of the conditions set out in this Decision Statement.

Condition 2.1: The Proponent shall, throughout all phases of the Designated Project, ensure that its actions in meeting the conditions set out in this Decision Statement are informed by the best available information and knowledge, including community and Aboriginal traditional knowledge, are based on validated methods and models, are undertaken by qualified individuals, and have applied the best available economically and technologically feasible measures.

In 2023, Pretium continued to engage the services of numerous reputable consulting companies and entities (e.g., Lorax Environmental Services Ltd., ERM Consultants Canada Ltd., WSP, SRK Consulting, Onsite Engineering Ltd., Northwest Invasive Plants Council, Integral Ecology Group, Northwest Response and Environmental Services Ltd. Nautilus Environmental Company Inc., ALS, Norlabs, and Bureau Veritas Canada) to provide the qualified professionals (e.g., R.P.Bio., P. Ag., P. Eng., P. Geo., P. Chem.).

Additionally, qualified persons are used to implement all activities according to the requirements. For example, in 2023 these activities included aquatic effects sampling and preparation of the 2023 Aquatics Resources Monitoring Report (ERM 2023a); invasive plant species survey and control (Northwest Invasive Plant Council contractor); review of ongoing water quality monitoring in Brucejack Creek conducted in accordance with established management plans by experienced Pretium scientific staff (Lorax Environmental); review and technical oversight of ongoing geochemistry and hydrogeological program monitoring by experienced Pretium scientific staff (Lorax Environmental); review of data collected for monitoring ambient air quality parameters at the Tsetsaut/Skii km Lax Ha Lodge and reported by experienced Pretium scientific staff (ERM); providing advice on aspects of wildlife monitoring, including monitoring of Little Brown Myotis (*Myotis lucifugus*) and Northern Myotis (*Myotis septentrionalis*) (ERM); oversight for monitoring and sample collection from groundwater monitoring wells (Lorax Environmental); review of groundwater well monitoring results (Lorax Environmental); toxicity testwork on aquatic organisms (Nautilus Environmental); annual inspection, engineering oversight and/or reviews for engineering aspects such as subaqueous deposition of waste rock and tailings and surface water management (Golder Associates Ltd./WSP, SRK Consulting, Knight Piesold Ltd.); and engineer of record support for the Brucejack Access Road (Onsite Engineering Ltd.).

Pretium consulted with the Nisga'a Nation, Tahltan Nation and Tsetsaut/Skii km Lax Ha during 2023. This occurred through the BC Environmental Assessment Office, BC Ministry of Environment and Climate Change Strategy, BC Ministry of Energy, Mines and Low Carbon Innovation, and BC Ministry of Forests, for applications to amend Effluent Discharge Permit 107835, Environmental Assessment Certificate #M15-01, and *Mines Act* Permit M-243. Effluent Discharge Permit 107835 was amended to allow discharge from a third Filterboxx C75 wastewater treatment unit, while amendments to EAC #M15-01 and *Mines Act* Permit M-243 were associated with expansions of the Certified Project Description boundary and Permitted Mine Area boundary, respectively. Air Permit 107025 has been under review and amendment is to follow in 2024. During 2023, Pretium met three times with the Nisga'a Nation to share information on mine operations and authorizations related matters. In 2023,

Brucejack's social performance department has had over sixty plus engagements with the Nisga'a Nation, Tahltan, and Tsetsaut/Skii km Lax Ha members, which comprised of engagements such as community events, meetings, career fairs, recruitment sprints and attendance at cultural celebrations. Also, monthly employment opportunities are shared with Nisga'a Nation, Tahltan, NEST, and Tsetsaut/Skii km Lax Ha. Pretium's CBA's, with its First nation Partners, guide the best approach to providing long-term benefits that reflect their interests and particular circumstances. Consultation with Aboriginal groups also occurred through referral of other applications and reports, including the 2023 Economic and Social Effects Mitigation Plan (ESEMP) Annual Report (Pretium, 2023f); 2022 Annual Report for *Mines Act* Permit M-243 and *Environmental Management Act* Permits PE-107835 and PA-107025 (Pretium, 2023c); 2022 CEAA Annual Report (Pretium, 2023e); 2022 Air Quality Monitoring Results report for the Tsetsaut/Skii km Lax Ha lodge (Pretium, 2023a); 2022 Brucejack Access Road SUP S25923 Maintenance Plan and Works Summary (Pretium, 2023d); and through the Wildlife Advisory Committee annual meeting, including through distribution of meeting materials requested by committee members.

4 CONDITION 2.5.3: CONSIDERATIONS FROM CONSULTATION

The proponent shall document in the annual report for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent has considered any views and information that the Proponent received during or as a result of the consultation.

The following sections identify the Decision Statement conditions that required consultation, and how the Proponent has considered the views and information received as per the requirements set out in Condition 2.2:

- *2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views on the subject of the consultation;*

Written notice of the opportunity to provide comments was provided via email to the Nisga'a Nation, Tahltan Nation and Tsetsaut/Skii km Lax Ha regarding various reports filed to comply with conditions of permits and other authorizations. Those reports included the 2022 Economic and Social Effects Mitigation Plan Annual Report (Pretium 2023f), 2022 Air Quality Monitoring Results for the Tsetsaut/Skii km Lax Ha Lodge (Pretium 2023a), 2022 Annual Glacier Ablation Monitoring Report (Pretium 2023b), 2022 Annual Report for *Mines Act* Permit M-243 and *Environmental Management Act* Permits 107835 and 107025 (including updated management plans; Pretium 2022c), 2021 CEAA Annual Report (Pretium 2023e), 2022 Brucejack Access Road SUP S25923 Maintenance Plan and Works Summary (Pretium 2023d), and through the Wildlife Advisory Committee annual meeting. In addition, multiple written requests for comments from Aboriginal groups were sent throughout the review processes for applications to amend Effluent Discharge Permit 107835, Air Permit 107025, Environmental Assessment Certificate #M15-01 and *Mines Act* Permit M-243 Amendments to Effluent Discharge Permit 107835 were associated with the authorization of a third Filterboxx C75 wastewater treatment unit, while amendments to EAC #M15-01 and *Mines Act* Permit M-243 were associated with expansions of the Certified Project Description boundary and Permitted Mine Area boundary, respectively.

Consultation with Aboriginal groups occurred during 2023 for revisions to the Wildlife Management Plan. The Plan was updated in 2023 and is included in Appendix 3 of the 202 Annual Report for *Mines Act* Permit M-243 and *Environmental Management Act* Permits PE-107835 and PA-107025 (Pretium, 2023). Updated versions of the Economic and Social Effects Mitigation Plan, Health Services and Monitoring Plan, Chemical and Materials Storage Handling Plan, Traffic and Access Management Plan, Heritage Management Plan, Invasive Management Plan, Vegetation Management Plan, Water Management Plan – Operations, Maintenance and Surveillance Manual (OMS Manual), Metal Leaching and Acid Rock Drainage Management Plan, Wildlife Management Plan, Chromium Management Plan, Mountain Goat Management Plan, Nitrogen Management Plan, Refuse and Incinerator Management Plan, Subsidence Monitoring and Management Plan, Ground Control Management Plan, and Geohazards Management Plan were included as part of the 2022 Annual Report for *Mines Act* Permit M-243 and *Environmental Management Act* Permits 107835 and 107025 (Pretium 2023c) referral.

- *2.2.2 provide sufficient information and a reasonable period of time to permit the party or parties being consulted to prepare their views;*

Documents or copies of plans and permit applications were distributed electronically, and all parties were given a minimum of 30 days to respond to the requests for comment.

- 2.2.3 provide a full and impartial consideration of any views presented by the party or parties being consulted; and
- 2.2.4 advise the party or parties that have provided comments on how the views and information received have been considered by the Proponent.

Responses received from the parties being consulted and Pretium responses are summarized relative to relevant Decision Statement condition in Sections 4.2 through 4.7 below.

4.1 CONDITION 2.4.2

Discuss consultation activities relative to Condition 2.4.2: Where the results of the monitoring and analysis indicate issues with respect to accuracy of the environmental assessment and/or the effectiveness of any mitigation measures that may lead to adverse environmental effects, identify the means by which the Proponent determines whether additional mitigation measures are required, including the need for consultation with other parties in reaching that determination.

There were no exceedances of MDMER water quality authorized limits of deleterious substances in 2023. There were no non-compliances with BC *Environmental Management Act* Effluent Discharge Permit 107835 during 2023. There was also one discharge rate and particulate matter exceedance under BC *Environmental Management Act* Air Discharge Permit 107025 during 2023 which resulted from partially plugged spray nozzles, damper on the outlet required adjustment, and dirty water supply to the scrubber inside the mill building. Filters and nozzles were installed to prevent plugging, therefore restoring particulate matter removal. The damper on the outlet was adjusted from 100% open to 80% open, which reduced fan suction, and eliminated water leaving the outlet of the scrubber. And water supply for the scrubber was switched from process water to fresh water, further preventing sediment plugging at the sprayer nozzles. The measured mass loading rate was below authorized limit, the air discharge limit exceedance did not increase any impacts to the receiving environment relative to existing permit conditions. The current treatment method still has the capacity to effectively treat the increased air flow.

Pretium submitted the “Brucejack Gold Mine MDMER Second Interpretive Report, July 2021” (ERM 2021) to Environment and Climate Change Canada (ECCC) on July 12, 2021. ECCC provided comments and action items back to Pretium on January 20, 2022. These action items were addressed in the memo “Brucejack Mine MDMER – EEM Second Interpretive Report (Cycle 2) Addendum and Response to ECCC Comments” (ERM 2023b). The Third Interpretive Report will be submitted in July 2024.

No other monitoring required by the Decision Statement identified the need for adjustment to mitigation measures, thus there were no other relevant consultation requirements in 2023.

4.2 CONDITIONS 5.2 AND 5.4

Discuss consultation activities relative to Condition 5.2: The Proponent shall, in consultation with the Nisga’a Nation and Tsetsaut/Skii km Lax Ha, monitor and assess any changes to ambient air quality at the Tsetsaut/Skii km Lax Ha Lodge that result from the Designated Project during all phases for particulate matter (10 microns in diameter or less) and fine particulate matter (2.5 microns in diameter or less) using the Canadian Ambient Air Quality Standards of the Canadian Council of Ministers of the Environment as a benchmark, as well as for nitrogen oxide, sulphur dioxide and carbon monoxide.

Ambient air quality monitoring at the Tsetsaut/Skii km Lax Ha Lodge was conducted throughout 2023. As in past years, monitoring at the lodge was conducted using a passive air sampling system (PASS) and portable air quality analyzers (3M EVM-7 and MetOne Instruments E-BAM 9800). Ambient Nitrogen Dioxide (NO₂) and Sulphur Dioxide (SO₂) were measured monthly with the PASS sampler, while on a quarterly basis the EBAM 9800 was used for monitoring particulate matter fractions (PM₁₀, PM_{2.5}) and the 3M EVM-7 monitored carbon monoxide (CO). The annual report of 2023 air quality monitoring results at the Tsetsaut/Skii km Lax Ha Lodge is provided to the Nisga'a Nation and Tsetsaut/ Skii km Lax Ha in March 2024.

Annual average concentrations during 2023 for NO₂, SO₂, and CO at the Tsetsaut/Skii km Lax Ha Lodge were well below their respective benchmarks. The CO data in Q1 was hindered by an inadequately configured instrumentation setup. The 2023 annual average concentrations of SO₂ and NO₂ were comparable to the 2021 data. Results for all four quarters for PM₁₀ and PM_{2.5} were below their respective benchmarks.

Discuss consultation activities relative to Condition 5.4: The Proponent shall develop and implement, in consultation with the Nisga'a Nation and Tsetsaut/Skii km Lax Ha, a follow-up program based on the monitoring specified in condition 5.2 to evaluate the effectiveness of mitigation measures identified under condition 5.1. The follow-up program shall start with construction and ceases at the end of the decommissioning phase.

During the permitting process in 2015, Pretium consulted the Nisga'a Nation and Tsetsaut/Skii km Lax Ha as part of the BC Mine Development Review Committee on the development of the Air Quality Monitoring Plan. Ambient air quality monitoring results from 2016 – 2023 were below Canadian Ambient Air Quality Standards of the Canadian Council of Ministers of the Environment benchmarks. The report regarding 2022 monitoring results at the Lodge was provided to the Nisga'a Nation and Tsetsaut/Skii km Lax Ha for review. Responses were received from Nisga'a Nation regarding the 2022 Air Quality Monitoring Results Tsetsaut / Skii km Lax Ha Lodge. Subsequently, Pretium responded to two rounds of questions and comments on April 13, 2023, and May 6, 2023. Any future request for consultation on results of monitoring will be followed up by Pretium.

In July 2017, Bowser Camp was deactivated and re-established as Bowser West Camp in the westernmost corner of Bowser License of Occupation (SK920922). Tsetsaut/Skii km Lax Ha also moved their Lodge to Bowser West site in 2017, however, there has been no observed occupancy since 2018. During 2019 and 2020 Bowser West Camp was deactivated with the only remaining activities being road maintenance, equipment storage, and mineral exploration crew use for drill core logging and sampling. This continued through 2023. A cement batch plant was also temporarily mobilized to Bowser in 2023.

4.3 CONDITION 5.3

Discuss consultation activities relative to Condition 5.3: The Proponent shall develop and implement, in consultation with the Nisga'a Nation and Tsetsaut/Skii km Lax Ha, a mechanism for receiving noise complaints due to noise caused by the Designated Project during all phases, and respond in a timely manner to any noise complaint received.

A Noise Complaint Form was developed by Pretium and provided to the Nisga'a Nation and Tsetsaut/Skii km Lax Ha for their review and input on September 2, 2015. The form was revised based

on comments received from the Tsetsaut/Skii km Lax Ha on September 2, 2015 and reissued shortly thereafter. No other comments and no noise complaints were received in 2023.

4.4 CONDITIONS 6.6 AND 6.7

(Condition 6.6) Discuss consultation activities relative to Condition 6.6: The Proponent shall, following consultation with Tsetsaut/Skii km Lax Ha, provide access to the Project Area to the Tsetsaut/Skii km Lax Ha for traditional purposes, to the extent that such access is safe.

The Traffic and Access Management Plan, which states that “Persons authorized to use the Brucejack Access Road will include First Nations people conducting traditional use activities under authorization of their Nation’s government”, was reviewed during the *Mines Act/Environmental Management Act* Permits Application review process in 2015, at which time comments from the Tsetsaut/Skii km Lax Ha were received and reflected in the Traffic and Access Management Plan which has been implemented through 2022. No requests for site access related to traditional use activities occurred in 2023.

(Condition 6.7) Discuss consultation activities relative to Condition 6.7: The Proponent shall, following consultation with the Nisga’a Nation, provide access to the Project Area for the Nisga’a Nation to exercise rights under the Nisga’a Final Agreement, to the extent that such access is safe.

The Traffic and Access Management Plan, which states that “Persons authorized to use the Brucejack Access Road will include First Nations people conducting traditional use activities under authorization of their Nation’s government”, was reviewed during the *Mines Act/Environmental Management Act* Permits Application review process in 2015. No comments were received from the Nisga’a Nation during this review, nor following its referral in draft via the 2018 Annual Report for *Mines Act* Permit M-243 and *Environmental Management Act* Effluent Permit 107835 and Air Permit 107025 (Pretium 2019) in March 2019 following update of the plan in December 2018. Wildlife related revisions to the Traffic and Access Management Plan were discussed during the 2019 Wildlife Advisory Committee meeting. No requests for site access related to traditional use activities occurred in 2020, 2021, 2022 or 2023.

4.5 CONDITION 6.8

Discuss consultation activities relative to Condition 6.8: Develop and implement, in consultation with the Nisga’a Nation and Tsetsaut/Skii km Lax Ha, a follow-up program to determine the effectiveness of the mitigation measures used to avoid mortality of fauna, including ungulates and furbearers, along the access road and to verify the accuracy of the environmental assessment.

During the permitting process in 2015, Pretium consulted the Nisga’a Nation and the Tsetsaut/Skii km Lax Ha on the development of the Wildlife Management Plan (WMP). Pretium proposed that a Wildlife Advisory Committee would be an appropriate venue for discussion of the effectiveness of mitigation measures, wildlife mortalities, accuracy of impacts to wildlife and potential additional mitigation measures. As per the WMP, Pretium established a Wildlife Advisory Committee with Nisga’a Nation, Tahltan Nation, Tsetsaut/Skii km Lax Ha, and BC Ministry of Forests. Committee meetings were held in April 2016, May 2017, June 2019, June 2020, July 2021, July 2022 and October 2023. Committee member conflicting schedules precluded a meeting in 2018.

Prior to each meeting, participants were provided a draft agenda for comment and additions, copies of documents for review at the meeting and a PowerPoint presentation of material to be presented

and discussed at the meeting. Meeting notes, including action items, were distributed to all committee members following each meeting.

During the 2023 Brucejack Wildlife Advisory Committee (WAC) meeting, committee members discussed action items from the 2022 WAC meeting, the new camp upgrades, the acquisition of Newcrest by Newmont, improvements made to Wildfire hill, electric fencing around portions of lower elevation camps, wildlife around camps, western toad monitoring, as well as wildlife monitoring observations, and mortalities along the access road.

Wildlife mortalities are discussed with Aboriginal groups attending the WAC. The effectiveness of mitigation plans and potential adaptive management measures remain as a subject for discussion with Aboriginal groups attending the WAC meetings.

4.6 CONDITION 7.1

Discuss consultation activities relative to Condition 7.1: Develop and implement, in consultation with Aboriginal groups, an archaeological and heritage resources management plan for the Designated Project prior to construction.

The Heritage Management Plan, and associated Heritage Chance Find Procedure, was reviewed by Aboriginal groups during the 2015 *Mines Act/Environmental Management Act* Permits Application (Pretium 2015) review process and completed in 2015. No comments were received. During construction activities in 2017 crews were made aware of and trained to use the Chance Find Procedure. No new archaeological or heritage resources were identified during construction activities in 2022. However, in 2023 two bones were found during excavation of a utility trench at Knipple Camp. Pretium immediately stopped excavation activities, engaged QP ERM Archaeologist for advice on the find, and filled out a Chance Find Report Form in the field in accordance with the Heritage Management Plan. ERM archaeologist confirmed that one bone was not human and likely a canid bone and the other bone was a rib from a large mammal. Excavation continued outside a 5-metre exclusion zone with an Environmental Monitor present. Once the bones were collected for analysis, removed, including photos of the trench, ERM QP advised the exclusion zone to be removed and digging continue with an Environmental Monitor present. Both bones were sent away for radiocarbon dating and results will be shared in the 2024 annual report once completed.

All three Aboriginal groups were consulted on a new Heritage Inspection Permit application that was submitted for the area encompassing the Brucejack Mine and ancillary infrastructure during 2020; no comments were received. The Aboriginal groups were also notified in advance of the most recent ground based archaeological impact assessment conducted in August 2023 along the Brucejack Access Road. This was for new areas of proposed additional disturbance, where communication towers are proposed to be sited. In July and August 2023 Environmental Resource Management (ERM) consultants conducted a preliminary field reconnaissance of proposed radio communications towers. These areas were assessed to have low potential for archaeology due to limited sediment development and moderate steeply sloped terrain. Surface exposures were examined throughout the assessment areas and found negative for cultural material. No additional cultural material was identified in 2023.

4.7 CONDITIONS 9.2 AND 9.4

Discuss consultation activities relative to Condition 9.2: The Proponent shall, prior to construction, consult with Aboriginal groups to identify potential accidents and malfunctions that may result in an adverse environmental effect, and on the measures to be applied to prevent such accidents and malfunctions.

Discuss consultation activities relative to Condition 9.4: Develop and implement a communication plan, in consultation with Aboriginal groups that shall include:

9.4.1: The types of accidents or malfunctions requiring a notification by the Proponent to the respective Aboriginal groups;

9.4.2: The manner by which Aboriginal groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Aboriginal groups to assist in the response to the accident or malfunction; and

9.4.3: The contact information of the representatives of the Proponent that the Aboriginal groups may contact and of the respective Aboriginal groups to which the Proponent provides notification.

Pretium sent a letter on September 4, 2015, to Aboriginal groups regarding Conditions 9.2 and 9.4.

Specifically, the letter stated that Pretium considered the consultation undertaken during the 2015 *Mines Act/Environmental Management Act* Permits Application (Pretium 2015) review process to have by and large fulfilled the Condition 9.2 requirement to consult with Aboriginal groups to identify potential accidents and malfunctions that may result in an adverse environmental effect, and on the measures to be applied to prevent such accidents and malfunctions. Though Pretium did encourage Aboriginal groups to review the materials provided in the letter regarding accidents and malfunctions and invited suggestions for change or additions to the plan or further consultation on the matters, Pretium has received no responses to date.

With regards to development and implementation of a communications plan concerning accidents and malfunctions (Condition 9.4), the September 2015 letter from Pretium suggested to the Tsetsaut/Skii km Lax Ha and the Tahltan Nation that the methods of notification and contact information included in the Aboriginal Consultation Plan (developed in consultation with these groups) be used. For the Nisga'a Nation, Pretium suggested that the Impacts and Benefits Agreement (IBA) between Pretium and Nisga'a Lisims Government provide the platform for fulfilling Condition 9.4. In 2017 an IBA was reached with the Tahltan Central Government and that agreement provides the platform for fulfilling Condition 9.4.

Regarding notification to Aboriginal groups about types of accidents and malfunctions, Condition 9.4.1, Pretium provided in the September 2015 letter a table of types of accidents and malfunctions, and associated risk and mitigation strategies to prevent the accident or malfunction. The table was intended as a basis for discussion of notification. Pretium also asked Aboriginal groups for suggestions on how they would like to assist in response to an accident or malfunction, as per Condition 9.4.2. To date Pretium has received no responses from any of the Aboriginal groups to this letter.

Tsetsaut/Skii km Lax Ha participated in company risk assessment meetings in prior years in Pretium's Vancouver office, follow-up meetings by conference calls and until late 2018 in monthly Joint Occupational Health and Safety Committee meetings at the mine site.

In 2023, no accidents or malfunctions occurred that had the potential to cause adverse environmental effects. There was, likewise, no additional consultation with Aboriginal groups on this topic.

5 CONDITION 2.5.4: FOLLOW-UP PROGRAMS

Condition 2.5.4: The proponent shall document in the annual report the results of the follow-up program requirements identified in conditions 3.4, 5.4, and 6.8.

5.1 CONDITION 3.4: WATER QUALITY AND FISH AND FISH HABITAT FOLLOW-UP PROGRAM

The Proponent shall develop and implement a water quality and fish and fish habitat follow-up program that shall include:

3.4.1 Monitoring the quality of water flowing from Brucejack Lake into Brucejack Creek to verify the accuracy of the water quality and fish and fish habitat predictions in the environmental assessment; and

3.4.2 Determining whether mitigation measures implemented to protect the quality of water flowing from Brucejack Lake into Brucejack Creek and downstream fish and fish habitat are effective.

Water flowing from Brucejack Lake (WRTSF) to Brucejack Creek continued to be monitored as per MDMER regulations and Appendix A of Effluent Discharge Permit 107835, as well as the Aquatic Effects Monitoring Plan, during the 2023 reporting period. No exceedances of MDMER were recorded.

The MDMER First Biological Monitoring Study was conducted in 2017 and the interpretive report was filed with Environment and Climate Change Canada (ECCC) in July 2018. ECCC provided comments on the first interpretive report on April 5, 2019. The comments were considered during development of the Second Biological Monitoring Study that was filed on February 3, 2020. Field sampling for the MDMER Second Biological Monitoring Study was completed in August 2020. The Second Interpretive Report was submitted on July 12, 2021. ECCC provided comments and action items back to Pretium on January 20, 2022. These action items were addressed in the memo “Brucejack Mine MDMER – EEM Second Interpretive Report (Cycle 2) Addendum and Response to ECCC Comments” (ERM 2023b). The MDMER Third Biological Monitoring Study Design was submitted to ECCC on March 14, 2023, and final report will be submitted in July 2024.

Water quality monitoring continues at the discharge compliance point and reference sample locations for the environmental effects monitoring. Toxicity tests results for *Daphnia magna* and Rainbow trout, along with effluent quality results, indicate mitigation measures implemented to protect the quality of water flowing from Brucejack Lake into Brucejack Creek and downstream are effective in protecting fish and fish habitat.

5.2 CONDITION 5.4: TSETSOUT/SKII KM LAX HA LODGE AMBIENT AIR QUALITY MONITORING FOLLOW UP PROGRAM

The Proponent shall develop and implement, in consultation with the Nisga'a Nation and Tsetsaut/Skii km Lax Ha, a follow-up program based on the monitoring specified in condition 5.2 to evaluate the effectiveness of mitigation measures identified under condition 5.1. The follow-up program shall start with construction and ceases at the end of the decommissioning phase.

Monthly passive monitoring of sulphur dioxide (SO₂) and nitrogen dioxide (NO₂) as well as quarterly ambient particulate and carbon monoxide (CO) sampling, was completed during 2023 at the Tsetsaut/Skii km Lax Ha Lodge located near km 52 of the Brucejack Access Road. The Tsetsaut/Skii km Lax Ha Lodge is not known to have been occupied since late 2018.

Annual average concentrations during 2023 for NO₂, SO₂, and CO at the Tsetsaut/Skii km Lax Ha Lodge were well below their respective benchmarks and comparable to 2022 concentrations. The CO data in Q1 was hindered by an inadequately configured instrumentation setup. The 2023 results for PM₁₀ and PM_{2.5} were below their respective benchmarks.

5.3 CONDITION 6.8: EFFECTIVENESS OF MITIGATION MEASURES TO AVOID MORTALITY OF FAUNA FOLLOW UP PROGRAM

The Proponent shall develop and implement, in consultation with the Nisga'a Nation and Tsetsaut/Skii km Lax Ha, a follow-up program to determine the effectiveness of the mitigation measures used to avoid mortality of fauna, including ungulates and furbearers, along the access road and to verify the accuracy of the environmental assessment.

During the permitting process in 2015, Pretium consulted the Nisga'a Nation and the Tsetsaut/Skii km Lax Ha on the development of the Wildlife Management Plan (WMP). The monitoring activities outlined in the WMP were ongoing in 2023 as summarized below.

Access Road Monitoring

Wildlife monitoring along the Brucejack Access Road is based on incidental wildlife observations recorded through various means (i.e., call-ins, observation forms, reporting during daily meetings). Incidental wildlife observations are not indicative of actual animal numbers. There are repeated observations by different people of the same animals on the same day or over a short period of time. Sightings are naturally weighted toward larger, more charismatic, and more visible species.

Wildlife sighting locations provide a general indication of larger species presence in the vicinity of the Brucejack Access Road and assist in directing mitigation efforts for wildlife and informing actions for safety of personnel.

The most common incidental wildlife observations reported in 2023 were (all reports – 638):

- 202 Black bear (32% of reports);
- 86 Moose (13% of reports);
- 49 Mountain goat (8% of reports);
- 22 Wolf (3% of reports);
- 26 Fox (4% of reports); and
- 25 Grizzly bear (4% of reports)

In comparison, the most common incidental wildlife observations reported in 2022 were:

- 132 Black bear (30% of reports);
- 103 Moose (23% of reports);
- 65 Mountain goat (4% of reports);
- 57 Wolf (3% of reports);

- 23 Fox (1% of reports); and
- 15 Grizzly bear (1 % of reports)

The animals indicated above are the ones most often seen and reported, the numbers seem to show reasonable parallels year over year.

From 2015 through 2023, black bears have been observed to be distributed along the Brucejack Access Road from its intersection with Highway 37 to km 58, with occasional sightings in the vicinity of the mine site. They are mainly observed in spring (44%) and summer (53%), with the vast majority of total sightings split between Bell Irving River valley and east of Knipple Lake.

Most Grizzly bear observations (64%) were in summer, with the remainder in fall and spring. There were no instances that occurred where animals showed any evidence of habituation.

Electrified fences currently surround areas that have animal attractants at the Brucejack mine and camps located below timberline (Wildfire and Knipple) and are activated during the spring through fall period.

Sightings of moose are concentrated (88%) along Bowser River valley from Brucejack Access Road km 35 and extending to km 55 immediately east of Knipple Camp. The remainder were observed between Highway 37 and km 35 of the Brucejack Access Road. Most moose sightings are in winter along the Bowser River valley, east of the Bowser Aerodrome (km 50).

Historically sightings of mountain goats were limited to between km 40 and 70 of the Brucejack Access Road (BJAR), with most of the 2023 sightings occurring at or around the 59.9 km marker on the BJAR. Many of these sightings are of the same group of animals that would spend considerable time in that location for much of the early summer. It is suspected that animals choose this site because it provides a number of nutrient resources.

Wolves have been observed at multiple locations along the lower Brucejack Access Road, usually from around the Km 30 until below Knipple camp with no sightings recorded between Knipple camp and Brucejack camp.

Building and Waste Management Monitoring

Internal environmental audits on buildings and the mine site area were routinely conducted by Pretium Waste Management and Environmental Department personnel during 2023. These audits included checks following the requirements of applicable Environmental Management Plans (EMPs) (e.g., Wildlife Management Plan and Waste Management Plan), and other relevant regulatory requirements.

Incidental Wildlife Monitoring

Incidental wildlife observations are recorded through various means (i.e., call-ins, observation forms, reporting during daily meetings). Personnel (including all contractors and visitors to site) are trained on the importance of reporting wildlife observations during new employee orientations and this practice is emphasized periodically at daily safety meetings. Signage is posted at various sites reminding people to report wildlife observations. Drivers call out wildlife sightings over the radio to raise awareness to other drivers.

There were 23 reported wildlife observations in 2023 within the mine site area (mine infrastructure within the mining leases), exclusive of the Brucejack Access Road section to the head of Knipple Glacier. A total of 5 species were recorded, including red foxes, grizzly bear, black bear, wolverine and hoary marmot. Wildlife observations along the Brucejack Access Road during 2023 are described above in the Access Road Monitoring subsection.

There were no observations of bats in the underground mine workings during 2023.

Pre-clearing Surveys

Pre-clearing surveys were conducted out for three projects during the summer of 2023. The first project involved the removal of danger trees close to the BJAR, identify as potentially hazardous by a certified arborist. A QP biologist assessed the area for bird nest, wildlife trees, and raptor nest. The second project focused on the construction of a bridge at Km 50 to replace the existing structure, straightening the road alignment. A survey for breeding birds and nesting activity was conducted before any site disturbance, and the biologist remained present during construction, especially for the work close to the stream. The third pre-clearing activity, conducted in late fall, involved surveying areas for active dens near the road. Vegetation along the roadside was trimmed to create escape ways for ungulates, preventing entrapment during winter snow clearing operations.

Transmission Line

A visual inspection of the transmission line was conducted in 2023 by Pretium Maintenance Department personnel, who visually inspect the line annually during a temporary shutdown. There were no reports of nests or bird mortalities.

Mountain Goat and Avalanche Monitoring

There are several areas around the mine and along the Brucejack Access Road that require avalanche control. Pretium Mountain Safety personnel complete an Avalanche Control Pre-blast Checklist, which includes scanning the area for mountain goats and other large mammals prior to commencing avalanche control. No wildlife was observed within avalanche zones during avalanche control work in the 2023 winter season. Details of avalanche control, monitoring methods and observability are presented to the Wildlife Advisory Committee annually.

Toad Tunnel Monitoring

Mitigation measures for protection of western toad (*Anaxyrus boreas*) along the Brucejack Access Road during the annual toad migration period are comprised of five toad tunnels and a modified bridge that were installed in 2016 and 2017. Monitoring toad use of the tunnels and the modified bridge has been conducted annually since 2017, including during 2023. Monitoring is conducted through use of remote trail cameras and by ground surveys. Trail cameras indicate a variety of small wildlife use the tunnels, with occasional images of young toads. As toadlets are difficult to see in camera images, toadlet numbers are likely under-counted. Ground surveys in 2023 between June 29 and October 5 noted the following for western toad:

- at 23.4 km tunnel 3 toads were observed;
- at 23.8 km tunnel 2 toads were observed;
- at 25.7 km tunnel 157 toads were observed at the tunnel;

- at 25.85 km tunnel 243 toads were observed at the tunnel;
- at 26 km tunnel 418 toads were observed at the tunnel; and
- at 42 km modified bridge no toads were observed using the crossing.

Western toad observation tallies for 2023 echoed the trend of previous years, with most individuals being encountered at the Km 25.85 and Km 26 tunnels. It is likely that these tunnels facilitate the dispersion of the same population and indicate that they are performing their intended function. However, as noted above, the camera images and ground surveys do not capture total numbers and represent a sample of the total that would have passed through the tunnels. The observed use of the tunnels and the annual reoccurrence of toad migration at these tunnel locations under the road suggest that the mitigation measures in place are effective and are helping to maintain the local population at these sites. Nature is variable and year on year variance in observations is an expected outcome.

Incidents (including Wildlife Collisions/ Mortalities)

Along with the various sightings of wildlife, there were some incidences that were reported. Some of these incidences were caused by natural phenomena such as predation (wolf kill about 300m off the road at the Km 27 marker) and a young moose found dead in the water at km 44 with no sign of human impact.

There were some occurrences that were reported of wildlife sightings in and around the camps, including one fox at Brucejack camp as well as some early spring black bears at Knipple camp, where the bears were spending extended time grazing on the new emergent greenery around the camp periphery. There was also one incident of a grizzly bear that located a water bottle out of a recycle bin that had been left outside the electric fence. Recycling bin was immediately removed, and no food reward was evident, so the bear left camp and did not return.

There were a small number of wildlife mortalities (3) that occurred on the BJAR and involved porcupines and grouses; these species are unfortunately involved in a higher proportion of road mortalities due to their slow locomotion and courtship behaviours, respectively. Wildlife mortalities recorded in the mine site area (area within the mining leases) in 2023 included one fox that was accidentally struck by a vehicle at night.

There have been no grizzly bear mortalities along the Brucejack Access Road or mine site to date as a result of mine-related activities since construction began in 2015, which is less than forecasted in the environmental assessment (Pretium 2014). Mitigation measures in effect for large ungulates and bears are considered largely effective. While predictions of mortalities of small furbearers were not included in the environmental assessment, camp hygiene and waste handling practices have resulted in few instances of mortality of small furbearers and therefore are considered to be effective.

6 **CONDITION 2.5.5: ADDITIONAL MITIGATION MEASURES IMPLEMENTED**

Condition 2.5.5: The proponent shall document in the annual report any additional mitigation measures implemented or proposed by the Proponent, as determined under condition 2.4.

Condition 2.4: The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:

2.4.1. Undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);

2.4.2. Where the results of the monitoring and analysis indicate issues with respect to the accuracy of the environmental assessment and/or the effectiveness of any mitigation measures that may lead to adverse environmental effects, identify the means by which the Proponent determines whether additional mitigation measures are required, including the need for consultation with other parties in reaching that determination; and

2.4.3. If additional mitigation measures are required pursuant to condition 2.4.2, implement and monitor these additional mitigation measures pursuant to condition 2.4.1.

No additional mitigation measures were identified or proposed in 2023 as a result of the follow-up programs identified in Conditions 3.4, 5.4, or 6.8 of the Decision Statement.

7 REFERENCES

- ERM. 2021. Brucejack Gold Mine Metal and Diamond Mining Effluent Regulations Environmental Effects Monitoring Second Interpretive Report. Vancouver, British Columbia.
- ERM. 2023a. Brucejack Mine: 2023 Aquatic Resources Monitoring Report. Vancouver, British Columbia.
- ERM. 2023b. Brucejack Mine MDMER – EEM Second Interpretive Report (Cycle 2) Addendum and Response to ECCC Comments. Vancouver, British Columbia.
- Pretium Resources Inc. (Pretium). 2015. Application for *Mines Act* and *Environmental Management Act* Permits. Submitted May 2015.
- Pretium Resources Inc. (Pretium). 2019. 2018 Annual Report for *Mines Act* Permit M-243, Effluent Permit 107835, and Air Permit 107025. Submitted March 2019.
- Pretium Resources Inc. (Pretium). 2020. 2020 Mine Plan and Reclamation Program Update. Submitted July 2020.
- Pretium Resources Inc. (Pretium). 2023a. 2022 Air Quality Monitoring Results – Tsetsaut/Skii km Lax Ha Lodge. Submitted March 2023.
- Pretium Resources Inc. (Pretium). 2023b. 2022 Annual Glacier Ablation Report. Submitted March 2023.
- Pretium Resources Inc. (Pretium). 2023c. 2022 Annual Report for *Mines Act* Permit M-243, Effluent Permit 107835, and Air Permit 107025. Submitted March 2022.
- Pretium Resources Inc. (Pretium). 2023d. 2022 Brucejack Access Road SUP S25923 Maintenance Plan and Works Summary. Submitted April 2023.
- Pretium Resources Inc. (Pretium). 2023e. 2022 CEAA Annual Report. Submitted March 2023.
- Pretium Resources Inc. (Pretium). 2023f. 2022 Economic and Social Effects Mitigation Plan Annual Report. Submitted January 2023.

**Appendix A Brucejack Mine Project: Implementation Activities
Undertaken (as per CEAA Decision Statement
Condition 2.5.1)**

Appendix A: Brucejack Mine Project: Implementation Activities Undertaken (as per CEAA Decision Statement Condition 2.5.1)

Section	Sub-section	Condition	Implementation Activities Undertaken
2		General Conditions	
2.1		The Proponent shall, throughout all phases of the Designated Project, ensure that its actions in meeting the conditions set out in this Decision Statement are informed by the best available information and knowledge, including community and Aboriginal traditional knowledge, are based on validated methods and models, are undertaken by qualified individuals, and have applied the best available economically and technologically feasible measures.	Refer to 2023 CEAA Annual Report Section 3.
2.2		The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:	<p>Generally, consultation is guided by the Aboriginal Consultation Plan developed by Pretium, as a condition of their BC Environmental Assessment Certificate, with review and input from Aboriginal groups. Consultation activities are also directed per the Impact Benefit Agreements established with the Nisga'a Lisims Government on behalf of the Nisga'a Nation and the Tahltan Central Government on behalf of the Tahltan Nation, and those that may be established with the Tsetsaut Skii km Lax Ha.</p> <p>Specific to this Decision Statement, consultation is required in relation to:</p> <ul style="list-style-type: none"> • Condition 5.2 – monitoring and assessment of changes in annual air quality • Condition 5.3 – development and implementation of noise complaint mechanism • Condition 5.4 – development and implementation of follow-up program for air emission mitigation measures • Conditions 6.6 and 6.7 – providing access to the Project Area for traditional purposes • Condition 7.1 – development and implementation of archaeological and heritage resources management plan • Condition 9.4 – development and implementation of an accidents and malfunctions communications plan <p>These consultation requirements have been met as outlined in the table entries below, specific to each relevant condition.</p>
	2.2.1	Provide a written notice of the opportunity for the party or parties being consulted to present their views on the subject of the consultation;	This practice has been implemented and will continue for the duration of the Project.
	2.2.2	Provide sufficient information and a reasonable period of time to permit the party or parties being consulted to prepare their views;	This practice has been implemented and will continue for the duration of the Project.
	2.2.3	Provide a full and impartial consideration of any views presented by the party or parties being consulted; and	This practice has been implemented and will continue for the duration of the Project.
	2.2.4	Advise the party or parties that have provided comments on how the views and information received have been considered by the Proponent.	This practice has been implemented and will continue for the duration of the Project.
2.3		The Proponent shall, where consultation with Aboriginal groups is a requirement of a condition set out in this Decision Statement, and prior to initiating that consultation, communicate with each Aboriginal group to determine the manner by which to satisfy the consultation requirements referred to in condition 2.2.	Consultation will continue to be guided by the Aboriginal Consultation Plan developed by Pretium, as a condition of their Environmental Assessment Certificate, with review and input from the Aboriginal groups. Consultation activities will also continue to be directed per the Impact Benefit Agreements established with the Nisga'a Nation and Tahltan Nation, and those that may be established with the Tsetsaut Skii km Lax Ha.
2.4		The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:	
	2.4.1	Undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);	Monitoring and analysis of data to verify the accuracy of the environmental assessment has been implemented as per BC <i>Mines Act</i> permit M-243 issued by the BC Ministry of Energy, Mines and Low Carbon Innovation, BC <i>Environmental Management Act</i> permits 107835 (effluent) and 107025 (air) issued by the Ministry of Environment and Climate Change Strategy, and the Metal and Diamond Mining Regulations as required under the <i>Fisheries Act</i> , in addition to various other permits and management plans that require monitoring.
	2.4.2	Where the results of the monitoring and analysis indicate issues with respect to the accuracy of the environmental assessment and/or the effectiveness of any mitigation measures that may lead to adverse environmental effects, identify the means by which the Proponent determines whether additional mitigation measures are required, including the need for consultation with other parties in reaching that determination; and	Refer to 2023 CEAA Annual Report Section 4.1.
	2.4.3	If additional mitigation measures are required pursuant to condition 2.4.2, implement and monitor these additional mitigation measures pursuant to condition 2.4.1.	No additional mitigation measures have been required to date.
2.5		The Proponent shall, from the reporting year where construction starts, submit to the Agency an annual report, including an executive summary of the annual report in both official languages. The annual report shall be submitted by the Proponent no later than March 31 following the reporting year. The Proponent shall document in the annual report:	Refer to the 2023 and earlier CEAA Annual Reports.

Section	Sub-section	Condition	Implementation Activities Undertaken
	2.5.1	Implementation activities undertaken in the reporting year for each of the conditions set out in this Decision Statement;	Implementation activities undertaken are tabulated in this Appendix.
	2.5.2	How it has considered and incorporated the factors set out in condition 2.1 in the implementation of the conditions set out in this Decision Statement;	Refer to 2023 CEAA Annual Report Section 3.
	2.5.3	For conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent has considered any views and information that the Proponent received during or as a result of the consultation;	Refer to 2023 CEAA Annual Report Section 4.
	2.5.4	The results of the follow-up program requirements identified in conditions 3.4, 5.4 and 6.8; and	Refer to 2023 CEAA Annual Report Section 5.
	2.5.5	Any additional mitigation measures implemented or proposed by the Proponent, as determined under condition 2.4.	No additional mitigation measures were required in 2023.
2.6		The Proponent shall publish on the Internet, or any similar medium, the annual report and the executive summary referred to in condition 2.5, the archaeological and heritage resources management plan referred to in condition 7.1, and the implementation schedule and any updates or revisions to that schedule referred to in condition 10, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for twenty-five years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first.	The Heritage Management Plan and the Implementation Schedule are available on Newcrest's (now Newmont's) website at: https://www.newcrest.com/our-assets/brucejack
2.7		The Proponent shall notify the Agency in writing no later than 60 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part.	Not applicable. No activity undertaken.
2.8		In the event another party becomes the Proponent of the Designated Project, it is bound by the conditions set out in this Decision Statement.	Not applicable. No activity undertaken.
3	Fish and Fish Habitat		
3.1		The Proponent shall, for all effluent discharges, comply with the <i>Fisheries Act</i> , the Metal and Diamond Mining Effluent Regulations (MDMER), and any discharge limits for effluent set by British Columbia that meet or exceed the requirements of the <i>Fisheries Act</i> and the Metal and Diamond Mining Effluent Regulations. In addition, the Proponent shall:	Pretium has implemented effluent monitoring as per British Columbia <i>Environmental Management Act</i> permit 107835, the Brucejack Aquatic Effects Monitoring Plan and MDMER criteria. BC permit 107835 monitoring data is reported in the Brucejack Mine annual reports for <i>Mines Act</i> Permit M-243, Effluent Permit 107835 and Air Permit 107025. The Second Biological Monitoring Design Study, per MDMER requirements, was filed with Environment and Climate Change Canada (ECCC) on February 3, 2020. Field sampling for the MDMER Second Biological Monitoring Study was completed in August 2020. The Second Interpretive Report was submitted in July 2021. Pretium received comments and action items from ECCC pertaining to the Second Interpretive Report in January 2022. Pretium submitted an Addendum and Response to ECCC Comments on March 13, 2023.
	3.1.1	Design and construct the perimeter ditching around the waste rock stockpile, mill building and portals to accommodate a 200-year rain-on-snow event;	Construction was completed in 2017.
	3.1.2	Capture and divert surface drainage and mine water effluent to the water treatment plant for treatment prior to discharge into Brucejack Lake;	This practice has been implemented and will continue for the duration of the Project.
	3.1.3	Immobilize tailings and deposit potentially acid generating rocks on the bottom of Brucejack Lake where they shall remain submerged at all times or in decommissioned stopes; and	This practice has been implemented and will continue for the duration of the Project.
	3.1.4	Use multiple turbidity curtains at the outlet of Brucejack Lake.	This practice has been implemented and will continue for the duration of the Project.
3.2		The Proponent shall protect fish and fish habitat during all phases of the Designated Project, which shall include the implementation of mitigation measures to avoid causing harm to fish and fish habitat when using explosives or conducting activities in or around water frequented by fish, as well as on the Knipple Glacier.	At the mine site the mine water treatment plant continues to be operational, as well, three turbidity curtains are installed at the outlet of Brucejack Lake; a Standard Operating Procedure and management plan related to the crossing of the Knipple Glacier is in place, as are Emergency and Spill Response Plans; monitoring for hydrocarbons undertaken downstream of the Knipple Glacier continued in 2023.
3.3		The Proponent shall, during decommissioning, reclaim riparian habitats along the access road which shall include the planting of native plant species.	Bowser Camp along the access road has been deactivated and most structures have been removed, however the site remains in use for Aerodrome related activities and storage and as a laydown area for storage of other contingency supplies (e.g. spare tower parts for the transmission line). During 2021 three log culverts were decommissioned (removed) along the BJAR (km 41.1, 41.8 and 55.5) and replaced with clear span bridges. The minor work areas within riparian habitats at these locations were reclaimed, including that these areas were seeded with native plant species. During 2023 the 50 km bridge was decommissioned along the BJAR and replaced with another bridge in a new alignment area. The minor work within the riparian habitats at these locations will be reclaimed and seeded with native plant species.

Section	Sub-section	Condition	Implementation Activities Undertaken
3.4		The Proponent shall develop and implement a water quality and fish and fish habitat follow-up program that shall include:	Refer to 2023 CEAA Annual Report Section 5.1
	3.4.1	Monitoring the quality of water flowing from Brucejack Lake into Brucejack Creek to verify the accuracy of the water quality and fish and fish habitat predictions in the environmental assessment; and	This practice has been implemented and will continue for the duration of the Project.
	3.4.2	Determining whether mitigation measures implemented to protect the quality of water flowing from Brucejack Lake into Brucejack Creek and downstream fish and fish habitat are effective.	Refer to 2023 CEAA Annual Report Section 5.1
4	Migratory Birds		
4.1		The Proponent shall carry out all phases of the Designated Project in a manner that protects and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment Canada's Avoidance Guidelines. The Proponent's actions in applying the Avoidance Guidelines shall be in compliance with the <i>Migratory Birds Convention Act, 1994</i> and with the <i>Species at Risk Act</i> .	Danger tree clearing along the BJAR was performed in 2023 following evaluation by a professional biologist.
4.2		The Proponent shall design and build the transmission line in a manner that prevents electrocution, discourages nesting and makes the transmission line more visible to migratory birds taking into account the Avian Power Line Interaction Committee's Suggested Practices for Avian Protection on Power Lines.	Construction of the transmission line was completed in March 2017. A review of transmission line design and construction by a Senior Wildlife Scientist with ERM Consultants Canada confirms that the design of the transmission line and construction met the condition.
5	Health and Aboriginal Peoples		
5.1		The Proponent shall implement mitigation measures to manage air emissions of the Designated Project during all phases, including:	
	5.1.1	Those mitigation measures required to comply with the Waste Discharge Regulation under British Columbia's <i>Environmental Management Act</i> for operational air emissions;	Implemented mitigation measures to manage air emissions continued during 2023, as per the <i>Environmental Management Act</i> permit 107025 and the Brucejack Air Quality Management Plan.
	5.1.2	Fugitive dust best management practices; and	In 2023, road watering continued to be used as a mitigation measure for managing fugitive dust along the Brucejack Access Road, Bowser storage area, Bowser Aerodrome and at the mine site.
	5.1.3	Use of low-sulphur diesel fuel equipment and pollution control equipment on mobile heavy equipment.	This practice has been implemented and will continue for the duration of the Project.
5.2		The Proponent shall, in consultation with the Nisga'a Nation and Tsetsaut Skii km Lax Ha, monitor and assess any changes to ambient air quality at the Tsetsaut Skii km Lax Ha Lodge that result from the Designated Project during all phases for particulate matter (10 microns in diameter or less) and fine particulate matter (2.5 microns in diameter or less) using the Canadian Ambient Air Quality Standards of the Canadian Council of Ministers of the Environment as a benchmark, as well as for nitrogen oxide, sulphur dioxide and carbon monoxide.	Refer to 2023 CEAA Annual Report Section 4.2.
5.3		The Proponent shall develop and implement, in consultation with the Nisga'a Nation and Tsetsaut Skii km Lax Ha, a mechanism for receiving noise complaints due to noise caused by the Designated Project during all phases, and respond in a timely manner to any noise complaint received.	This practice has been implemented and will continue for the duration of the Project. No noise complaints have been received to date.
5.4		The Proponent shall develop and implement, in consultation with the Nisga'a Nation and Tsetsaut Skii km Lax Ha, a follow-up program based on the monitoring specified in condition 5.2 to evaluate the effectiveness of mitigation measures identified under condition 5.1. The follow-up program shall start with construction and ceases at the end of the decommissioning phase.	Refer to 2023 CEAA Annual Report Section 4.2.
	5.4.1	The Proponent shall inform the Nisga'a Nation and Tsetsaut Skii km Lax Ha in cases of exceedances at the Tsetsaut Skii km Lax Ha Lodge of the Canadian Ambient Air Quality Standards of the Canadian Council of Ministers of the Environment parameters specified in condition 5.2.	Ambient air quality monitoring at this site continued in 2023. No exceedances were noted in the Tsetsaut Skii km Lax Ha Lodge results. A report will be provided in March, 2024.
6	Current Use of Lands and Resources for Traditional Purposes		
6.1		The Proponent shall provide Aboriginal groups with the implementation schedule and any updates or revisions to that schedule as stated in condition 10 at the same time the Proponent provides the schedule to the Agency.	The Implementation Schedule was provided to Aboriginal groups and the Agency in August 2015. Updated implementation schedules were subsequently provided on February 24, 2017, March 13, 2019, March 29, 2021, and March 12, 2023.
6.2		The Proponent shall prohibit any hunting, fishing and trapping within the Project Area by the Proponent's employees and contractors hired by the Proponent, unless an employee or a contractor is provided access for traditional purposes as per condition 6.6 or for exercising rights as per condition 6.7.	This practice has been implemented and will continue for the duration of the Project.
6.3		The Proponent shall prohibit public access to the access road.	This practice has been implemented and will continue for the duration of the Project.

Section	Sub-section	Condition	Implementation Activities Undertaken
6.4		The Proponent shall impose speed limits on the access road taking into account provincial guidelines.	Speed limits are established in the Brucejack Traffic & Access Management Plan based on the road design, and signage in both directions of travel has been posted along the Brucejack Access Road to advise of road speed. In addition, speed limits are discussed in the Brucejack Access Road Standard Operating Procedure, which is issued to all drivers/contractors prior to travelling the access road.
6.5		The Proponent shall construct and maintain gaps in snow banks large enough to provide passage for fauna, including ungulates and furbearers.	Once the depth of snow warranted it, gaps in the snow banks were constructed and maintained along the access road during 2022/2023 winter season. Additionally, for much longer sections of the road, a grader was used to cut down the height of the snow banks to allow for wildlife passage along the length of the banks, not just at gaps. Grading practices will continue to be evaluated on an ongoing basis through the winter.
6.6		The Proponent shall, following consultation with Tsetsaut Skii km Lax Ha, provide access to the Project Area to the Tsetsaut Skii km Lax Ha for traditional purposes, to the extent that such access is safe.	Refer to 2023 CEAA Annual Report Section 4.4.
6.7		The Proponent shall, following consultation with the Nisga'a Nation, provide access to the Project Area for the Nisga'a Nation to exercise rights under the Nisga'a Final Agreement, to the extent that such access is safe.	Refer to 2023 CEAA Annual Report Section 4.4.
6.8		The Proponent shall develop and implement, in consultation with the Nisga'a Nation and Tsetsaut Skii km Lax Ha, a follow-up program to determine the effectiveness of the mitigation measures used to avoid mortality of fauna, including ungulates and furbearers, along the access road and to verify the accuracy of the environmental assessment.	Refer to 2023 CEAA Annual Report Section 4.5 and Section 5.3.
7	Physical and Cultural Heritage and Structures, Sites or Things of Historical, Archaeological, Paleontological or Architectural Significance		
7.1		The Proponent shall develop and implement, in consultation with Aboriginal groups, an archaeological and heritage resources management plan for the Designated Project prior to construction. The archaeological and heritage resources management plan shall take into account British Columbia's Handbook for the Identification and Recording of Culturally Modified Trees. The archaeological and heritage resources management plan shall include:	Refer to 2023 CEAA Annual Report Section 4.6. A Heritage Management Plan and accompanying Heritage Chance Find Procedure was developed in 2015 (updated December 2018 & February 2023) and implemented prior to the start of construction activities and in use throughout 2023.
	7.1.1	A description of structures, sites or things of historical, archaeological, paleontological or architectural significance (including Culturally Modified Trees) that may be encountered by the Proponent during construction;	A Heritage Management Plan and accompanying Heritage Chance Find Procedure was developed and implemented prior to the start of construction activities. The primary construction period ended in 2017; cultural and heritage features continue to be managed by implementation of the Heritage Management Plan and accompanying Heritage Chance Find Procedure.
	7.1.2	Procedures and practices for on-site monitoring of construction activities that may affect a structure, site or thing of historical, archaeological, paleontological or architectural significance (including a Culturally Modified Tree) and for the identification and removal of the resource; and	A Heritage Management Plan and accompanying Heritage Chance Find Procedure was developed in 2015 (updated December 2018 & January 2023) and implemented prior to the start of construction activities and in use throughout 2023.
	7.1.3	A chance find protocol if a previously unidentified structure, site or thing of historical, archaeological, paleontological or architectural significance (including a Culturally Modified Tree) is discovered by the Proponent or brought to the attention of the Proponent by an Aboriginal group or another party during construction.	A Heritage Management Plan and accompanying Heritage Chance Find Procedure was developed in 2015 (updated December 2018 & January 2023) and implemented prior to the start of construction activities and in use throughout 2023.
8	Species at Risk		
8.1		The Proponent shall conduct pre-clearing surveys to determine distribution of Little Brown Myotis (<i>Myotis lucifugus</i>) and Northern Myotis (<i>Myotis septentrionalis</i>) and establish a 50-metre buffer zone around active hibernacula and active roosts.	This practice has been implemented and will continue for the duration of the Project. No clearing of timber suitable for bat roosts was completed in 2023 and the clearing occurred outside of the active roosting season. If clearing is to occur within the roosting season, the pre-clearing survey protocol includes: <ul style="list-style-type: none"> retain a professional biologist to conduct a pre-clearing survey and provide applicable advice use the Resource Inventory Standards Committee (RISC) that describes that searches for maternal roosts for bats should include suitable features, such as snags, for signs of bats but does not provide a detailed methodology. For Pretium, the roost searches would involve searching the area to be cleared for wildlife trees such as snags and recording if there are any signs of use by bats (urine stains, droppings or the sound of bats) as described in ERM (2015) 2015 Raptor and Bat Roost Pre-clearing Surveys Results. Table 5.5-1 of the Wildlife Management Plan (2024) includes a minimum 50 m buffer zone around active hibernacula and active roosts for bats.
8.2		The Proponent shall, prior to construction and throughout all phases of the Designated Project, install and maintain roosting structures to offset if there is loss of Little Brown Myotis (<i>Myotis lucifugus</i>) and Northern Myotis (<i>Myotis septentrionalis</i>) bat roosting habitat.	No roosting structures were found during the bat roosting surveys in 2015 or during clearing activities in 2015 through 2021. Additionally, seven bat boxes were installed in appropriate habitat along the access road and three along the transmission line in 2017. In 2022, bat evidence was observed along the Brucejack Access Road (BJAR) at 36.3 km and 47 km bat boxes during occupancy surveys. In 2023, bat evidence was observed along the BJAR at 36.3 km during occupancy surveys. Occupancy surveys will continue twice yearly from May to September during maternal season when bats are occupying roosts. No mortalities have been observed.

Section	Sub-section	Condition	Implementation Activities Undertaken
8.3		The Proponent shall monitor mortality of Little Brown Myotis (<i>Myotis lucifugus</i>) and Northern Myotis (<i>Myotis septentrionalis</i>) and their usage at buffer-zones and of roosting structures, to determine the effectiveness of the mitigation measures during construction and operation.	An annual bat monitoring program was implemented in spring 2022, that focuses on the ten bat boxes that have been installed. Monitoring via occupancy surveys continued in 2023.
8.4		The Proponent shall construct wildlife tunnels and fencing along the access road to allow passage of the Western Toad (<i>Anaxyrus boreas</i>) beneath the road as close as possible to existing migration corridors taking into account British Columbia's Guidelines for Amphibian and Reptile Conservation during Urban and Rural Land Development in BC.	To protect Western Toad (<i>Anaxyrus boreas</i>) during migration, five toad tunnels and a modified bridge were installed along the Brucejack Access Road in 2016 and 2017. All sites were fenced to direct toads to the corridors. Monitoring of toad use of the tunnels and bridge continued in 2023; results are described in section 5.3.
9	Accidents or Malfunctions		
9.1		The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects and shall implement emergency response procedures and contingencies developed in relation to the Designated Project.	All management plans relevant to mitigate for accidents and malfunctions have been implemented.
9.2		The Proponent shall, prior to construction, consult with Aboriginal groups to identify potential accidents and malfunctions that may result in an adverse environmental effect, and on the measures to be applied to prevent such accidents and malfunctions.	Refer to 2023 CEAA Annual Report Section 4.7.
9.3		In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall:	No accidents or malfunctions with the potential to cause adverse environmental effects occurred in 2023.
	9.3.1	Notify relevant federal and provincial authorities, including notifying the Agency in writing of the accident or malfunction as soon as possible in the circumstances;	Not applicable; no such occurrence in 2023.
	9.3.2	Implement immediate measures to minimize any adverse environmental effects associated with the accident or malfunction;	Not applicable; no such occurrence in 2023.
	9.3.3	Submit a written report to the Agency as soon as possible in the circumstances, but no later than 30 days after the day on which the accident or malfunction took place. The written report shall include:	Not applicable; no such occurrence in 2023.
	9.3.3.1	A description of the accident or malfunction and of its adverse environmental effects;	Not applicable; no such occurrence in 2023.
	9.3.3.2	The measures that were taken by the Proponent to mitigate the environmental effects of the accident or malfunction;	Not applicable; no such occurrence in 2023.
	9.3.3.3	A description of any residual environmental effects, and any additional measures required to address residual environmental effects; and	Not applicable; no such occurrence in 2023.
	9.3.3.4	If an emergency response plan was implemented, details concerning its implementation.	Not applicable; no such occurrence in 2023.
	9.3.4	As soon as possible in the circumstances, but no later than 90 days after the day on which the accident or malfunction took place, submit a written report to the Agency on the changes made to avoid a subsequent occurrence of the accident or malfunction and on the implementation of any additional measures to mitigate residual environmental effects.	Not applicable; no such occurrence in 2023.
		The Proponent shall develop and implement a communication plan, in consultation with Aboriginal groups, that shall include:	Refer to 2023 CEAA Annual Report Section 4.7.
	9.4.1	The types of accidents or malfunctions requiring a notification by the Proponent to the respective Aboriginal groups;	Refer to 2023 CEAA Annual Report Section 4.7.
	9.4.2	The manner by which Aboriginal groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Aboriginal groups to assist in the response to the accident or malfunction; and	Refer to 2023 CEAA Annual Report Section 4.7.
	9.4.3	The contact information of the representatives of the Proponent that the Aboriginal groups may contact and of the respective Aboriginal groups to which the Proponent provides notification.	Refer to 2023 CEAA Annual Report Section 4.7.
10	Implementation Schedule		
10.1		The Proponent shall submit an implementation schedule for conditions contained in this Decision Statement to the Agency, or anyone designated pursuant to section 89 of the <i>Canadian Environmental Assessment Act, 2012</i> , at least 30 days prior to construction. The implementation schedule shall indicate the commencement and completion dates for each activities relating to conditions set out in this Decision Statement.	The Implementation Schedule was provided to Aboriginal groups and the Agency August 2015.
10.2		The Proponent shall submit an update to this implementation schedule in writing to the Agency, or anyone designated pursuant to section 89 of the <i>Canadian Environmental Assessment Act, 2012</i> , every two years on or before March 31, until completion of the activities.	Revised schedules were provided on February 24, 2017, March 13, 2019, March 29, 2021, and March 12, 2023.

Section	Sub-section	Condition	Implementation Activities Undertaken
10.3		The Proponent shall provide the Agency, or anyone designated pursuant to section 89 of the <i>Canadian Environmental Assessment Act, 2012</i> , with a revised implementation schedule if any change occurs from the initial schedule or any subsequent updates. The Proponent shall provide the revised implementation schedule at least 30 days prior to the implementation of the change.	A revised schedule was provided on March 13, 2019 for production expansion activities, with additional revised schedules provided March 29, 2021 and March 12, 2023 in accordance with the Condition 10.2 requirement to provide an updated schedule every two years.
11	Record Keeping		
11.1		The Proponent shall maintain a written record, or a record in an electronic format compatible with that used by the Agency, and retain and make available that record to the Agency, or anyone designated pursuant to section 89 of the <i>Canadian Environmental Assessment Act, 2012</i> , at a facility close to the Designated Project (local facility). The record shall include information related to the implementation of the conditions set out in this Decision Statement, and the results of all associated monitoring, including:	All records required under the Decision Statement are kept in electronic format accessible at the Brucejack Mine site and from Pretium's offices in Smithers and Vancouver.
	11.1.1	The place, date and time of any sampling, as well as techniques, methods or procedures used;	This practice continued during 2023.
	11.1.2	The dates and the analyses that were performed;	This practice continued during 2023.
	11.1.3	The analytical techniques, methods or procedures used in the analyses;	This practice continued during 2023.
	11.1.4	The names of the persons who collected and analyzed each sample and documentation of any professional certifications relevant to the work performed that they might possess; and	This practice continued during 2023.
	11.1.5	The results of the analyses.	This practice continued during 2023.
11.2		The Proponent shall retain and make available upon demand to the Agency, or anyone designated pursuant to section 89 of the <i>Canadian Environmental Assessment Act, 2012</i> , the information contained in condition 11.1 at a facility close to the Designated Project (or at a location within Canada and agreed upon by the Agency, should the local facility no longer be maintained). The information shall be retained and made available throughout construction and operation, and for twenty-five years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first.	Required information can be accessed from the Brucejack Mine site or either of Pretium's offices in Smithers and Vancouver.