



PRETIUM RESOURCES INC.

A wholly-owned indirect subsidiary of Newmont Corporation

BRUCEJACK MINE
2024 CEAA Annual Report

March 2025



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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. 2024 was the seventh 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, March 12, 2023, and March 1, 2025.

At the mine site, fish health and habitat protection during 2024 continued to be achieved through use of the water treatment plant and turbidity curtains at the outlet of the Waste Rock and Tailings Storage Facility (WRTSF, formerly Brucejack Lake). At the mine, tailings are generated and deposited as a thickened slurry on the bottom of the WRTSF, this practise continued in 2024. Waste rock from underground activities in 2024 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 the final report was submitted in July 2024. The MDMER Fourth Biological Monitoring Study Design will be submitted to ECCC in 2025 and final report will be issued in 2026.

To protect western toad (*Anaxyrus boreas*) during migration, five toad tunnels and a modified bridge were installed along the Brucejack Access Road (BJAR) in 2016 and 2017. Toad use of the tunnels and the modified bridge was monitored with remote trail cameras and ground surveys in 2024 between May 11 and October 17. Monitoring surveys have now been conducted for toadlet migration periods over the last nine years.

Air quality management during 2024 focused on measures to reduce fugitive dust, with the application of calcium brine to the BJAR. Tsetsaut/Skii Km Lax Ha relocated their lodge in 2017; monitoring of air quality has continued at the new lodge location, as well as at Knipple and Brucejack camps. The 2024 air quality report on monitoring at the lodge was submitted to Nisga'a Nation and Tsetsaut/Skii Km Lax Ha in February 2025.

Brucejack continued to maintain a security gate at the start of the BJAR during 2024. 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 BJAR.

Measures to protect wildlife along the BJAR were enhanced by posting wildlife related signage, including markers for toad tunnel locations, as well as speed limits and warning signage indicating the

presence of potential moose crossing areas. Education programs were implemented and the moose pushout program continued. Moose pushouts allow large ungulates to avoid getting trapped by high snowbanks along the road, reducing the potential from harm by vehicle traffic.

No archaeological sites were discovered during 2024 activities.

Wildlife record keeping continued during 2024 using the systems established in 2015.

Brucejack consulted with the Nisga'a Nation, Tahltan Nation and Tsetsaut/Skii Km Lax Ha during 2024. 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. Air Permit 107025 was amended May 16, 2024. In 2024, Pretium Social Performance Department had over 65 engagements with Nisga'a Nation, Tahltan, and Tsetsaut/Skii Km Lax Ha member, which comprised community events, meetings, career fairs, recruitment sprints and attendance of cultural celebrations. The engagements also focused on sharing information on mine operations, authorizations, and related matters. 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;
- 2023 Annual Report for *Mines Act* Permit M-243 and *Environmental Management Act* Permits PE-107835 and PA-107025;
- 2023 CEAA Annual Report;
- 2023 Air Quality Monitoring Report for the Tsetsaut/Skii Km Lax Ha lodge;
- 2023 Brucejack Access Road SUP S25923 Maintenance Plan and Works Summary; and
- Wildlife Advisory Committee annual meeting, including through distribution of meeting materials requested by committee members.

Brucejack worked closely with local and regional communities during 2024 to provide information and to maximize benefits associated with employment, training, and business opportunities. Brucejack is in regular contact with employment representatives from First Nations to communicate job postings, provide information about required skills and experience, and organize recruitment events. Brucejack 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 2024, Brucejack's workforce amounted to 1038 people employed directly by Pretium. Most contractor workers continue to be employed through Procon which is the single largest contractor and responsible for underground mining. Of Brucejack's direct hires, 38% resided in northwest BC and 25% self-identified as Aboriginal.

RÉSUMÉ EXÉCUTIF

Pretium Resources Inc. (Pretium), une filiale indirecte en propriété exclusive de Newmont Corporation (Newmont), a reçu la déclaration de décision du ministre de l'Environnement du Canada le 30 juillet 2015 pour la mine Brucejack, une mine souterraine d'or située à 65 km au nord de Stewart, en Colombie-Britannique (CB). Les activités de construction ont commencé le 5 septembre 2015, avec une mise en service commerciale le 1er juillet 2017. L'année 2024 a marqué la septième année complète de production d'or.

Conformément à la Condition 10 de la Déclaration de décision, le calendrier de mise en œuvre a été transmis à la Nation Nisga'a, à la Nation Tahltan, à Tsetsaut/Skii Km Lax Ha et à 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, le 12 mars 2023 et le 1er mars 2025.

Sur le site minier, la protection de la santé des poissons et de l'habitat en 2024 a continué d'être assurée par l'utilisation de la station de traitement des eaux et des rideaux de turbidité à la sortie de l'installation de stockage des roches stériles et des résidus miniers (WRTSF, anciennement le lac Brucejack). À la mine, les résidus sont générés et déposés sous forme de boue épaissie au fond du WRTSF, cette pratique a continué en 2024. Les roches stériles provenant des activités souterraines en 2024 ont été déposées sous l'eau dans le WRTSF. La surveillance des effluents a continué conformément au permis de la Loi sur la gestion de l'environnement en Colombie-Britannique (permis 107835) et au Règlement sur les effluents miniers métalliques et diamants (MDMER). Le plan de l'étude biologique de surveillance n° 2 du MDMER a été déposé auprès d'Environnement et Changement climatique Canada le 3 février 2020. L'échantillonnage sur le terrain pour l'étude biologique n° 2 du MDMER a été achevé en août 2020. Le deuxième rapport interprétatif sur le suivi des effets environnementaux (EEM) du MDMER de la mine Brucejack a été soumis le 12 juillet 2021. Environnement et Changement climatique Canada (ECCC) a fourni des commentaires sur le deuxième rapport interprétatif en janvier 2022. Pretium a soumis un addenda et une réponse à l'ECCC avec des commentaires le 13 mars 2023. Le plan de l'étude biologique n° 3 du MDMER a été soumis à l'ECCC le 14 mars 2023, et le rapport final a été soumis en juillet 2024. Le plan de l'étude biologique n° 4 du MDMER sera soumis à l'ECCC en 2025 et le rapport final sera publié en 2026.

Pour protéger le crapaud occidental (*Anaxyrus boreas*) lors de la migration, cinq tunnels pour crapauds et un pont modifié ont été installés le long de la route d'accès Brucejack (BJAR) en 2016 et 2017. L'utilisation des tunnels par les crapauds et le pont modifié a été surveillée à l'aide de caméras à déclenchement à distance et de sondages au sol en 2024 entre le 11 mai et le 17 octobre. Les enquêtes de surveillance ont maintenant été menées pendant les périodes de migration des crapauds depuis neuf ans.

La gestion de la qualité de l'air en 2024 s'est concentrée sur des mesures visant à réduire la poussière fugitive, avec l'application de saumure de calcium sur la BJAR. Tsetsaut/Skii Km Lax Ha a déplacé leur pavillon en 2017 ; la surveillance de la qualité de l'air a continué au nouvel emplacement du pavillon, ainsi qu'aux camps de Knipple et Brucejack. Le rapport de qualité de l'air de 2024 concernant la surveillance au pavillon a été soumis à la Nation Nisga'a et à Tsetsaut/Skii Km Lax Ha en février 2025.

Brucejack a continué de maintenir une barrière de sécurité au début de la BJAR pendant l'année 2024. La « politique de non-chasse, non-pêche, non-piège » est restée en vigueur. Les contrôles des armes à feu et des équipements de pêche ont continué au centre de sécurité situé au km 1 de la BJAR.

Les mesures de protection de la faune le long de la BJAR ont été renforcées par l'affichage de panneaux de signalisation relatifs à la faune, y compris des repères pour les emplacements des tunnels

pour crapauds, ainsi que des limites de vitesse et des panneaux d'avertissement indiquant la présence de zones de passage potentielles des orignaux. Des programmes éducatifs ont été mis en œuvre et le programme de repousser les orignaux a continué. Le programme de repousse des orignaux permet aux grands ongulés d'éviter de se retrouver piégés par de hautes banquettes de neige le long de la route, réduisant ainsi les risques de blessures dues à la circulation des véhicules.

Aucun site archéologique n'a été découvert lors des activités de 2024.

La tenue des registres de la faune a continué en 2024 en utilisant les systèmes établis en 2015.

Brucejack a consulté la Nation Nisga'a, la Nation Tahltan et Tsetsaut/Skii Km Lax Ha en 2024. Cette consultation s'est réalisée par l'intermédiaire du Bureau d'évaluation environnementale de la CB, du ministère de l'Environnement et de la Stratégie en matière de changement climatique de la CB, du ministère de l'Énergie, des Mines et de l'Innovation en matière de faible carbone de la CB, et du ministère des Forêts de la CB pour les demandes de modification du permis de décharge des effluents 107835, du certificat d'évaluation environnementale n° M15-01, et du permis de la Loi sur les mines M-243. Le permis de qualité de l'air 107025 a été modifié le 16 mai 2024. En 2024, le département de la performance sociale de Pretium a eu plus de 65 engagements avec des membres des Nations Nisga'a, Tahltan et Tsetsaut/Skii Km Lax Ha, comprenant des événements communautaires, des réunions, des foires de l'emploi, des campagnes de recrutement et la participation à des célébrations culturelles. Les engagements ont également porté sur le partage d'informations concernant les opérations minières, les autorisations et les questions connexes. La consultation avec les groupes autochtones s'est également poursuivie par l'intermédiaire de la soumission d'autres demandes et rapports, y compris :

- Rapport annuel 2023 du Plan d'atténuation des effets économiques et sociaux (ESEMP);
- Rapport annuel 2023 pour les permis de la Loi sur les mines M-243 et les permis de la Loi sur la gestion de l'environnement PE-107835 et PA-107025;
- Rapport annuel 2023 de l'ACEE ;
- Rapport de surveillance de la qualité de l'air 2023 pour le pavillon de Tsetsaut/Skii Km Lax Ha;
- Plan de maintenance et résumé des travaux pour la route d'accès Brucejack SUP S25923 en 2023;
- Réunion annuelle du comité consultatif sur la faune, y compris la distribution des documents de la réunion demandés par les membres du comité.

Brucejack a travaillé en étroite collaboration avec les communautés locales et régionales pendant l'année 2024 afin de fournir des informations et de maximiser les avantages liés à l'emploi, à la formation et aux opportunités commerciales. Brucejack est en contact régulier avec les représentants de l'emploi des Premières Nations pour communiquer les offres d'emploi, fournir des informations sur les compétences et expériences requises et organiser des événements de recrutement. Brucejack continue de collaborer avec les groupes autochtones pour identifier les besoins de formation et les opportunités, ainsi que les possibilités pour les entreprises autochtones de fournir des biens et services. En décembre 2024, la main-d'œuvre de Brucejack comptait 1038 personnes employées directement par Pretium. La plupart des travailleurs contractuels continuent d'être employés par Procon, le plus grand entrepreneur, responsable de l'exploitation minière souterraine. Parmi les embauchés directs de Brucejack, 38 % résidaient dans le nord-ouest de la CB et 25 % s'identifiaient comme autochtones.

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GLOSSARY AND ABBREVIATIONS

AEMP	Aquatic Effects Monitoring Plan
BJAR	Brucejack Access Road
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

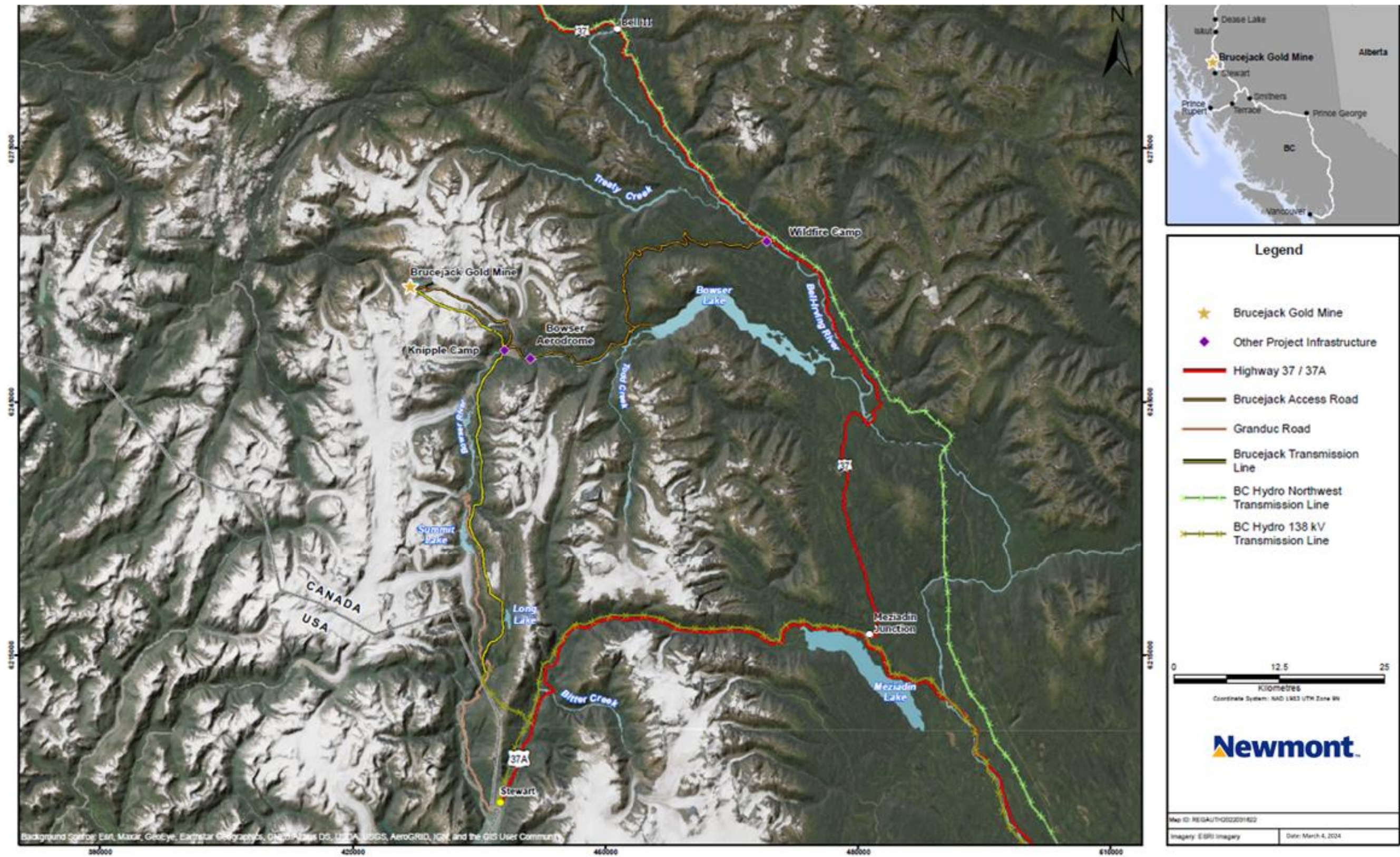
The Brucejack Mine is an underground gold-silver mine located approximately 65 Km north of Stewart, British Columbia (BC) (Figure 1). The current permitted production totals 18.5 million tonnes of mineralized material at an average annual rate of 1,387,000 tonnes, which equates to approximately 3,800 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. The year 2024 marked the seventh 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.



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 up to and including 2024.

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 2024, Brucejack continued to engage numerous reputable consulting companies and entities, such as 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 Ltd., Norlabs, and Bureau Veritas Canada. These companies provided qualified professionals, including R.P.Bio., P. Ag., P.Eng, P. Geo., and P. Chem.

Qualified professionals were involved in various activities, including:

- Aquatic effects sampling and preparation of the 2024 Aquatics Resources Monitoring Report (ERM 2024a)
- Invasive plant species survey and control (Northwest Invasive Plant Council contractor)
- Ongoing water quality monitoring in Brucejack Creek (Lorax Environmental)
- Technical oversight of geochemistry and hydrogeological program monitoring (Lorax Environmental)
- Monitoring ambient air quality parameters at the Tsetsaut/Skii Km Lax Ha Lodge (ERM)
- Wildlife monitoring, including Little Brown Myotis and Northern Myotis (ERM)
- Groundwater monitoring wells oversight and sample collection (Lorax Environmental)
- Groundwater well monitoring results review (Lorax Environmental)
- Toxicity test work on aquatic organisms (Nautilus Environmental)
- Annual inspection and engineering oversight for subaqueous deposition of waste rock and tailings, and surface water management (WSP, SRK Consulting)
- Engineer of record support for the Brucejack Access Road (Onsite Engineering Ltd.)

Brucejack mine consulted with the Nisga'a Nation, Tahltan Nation, and Tsetsaut/Skii Km Lax Ha during 2023-2024. This consultation 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.

BC EAC M15-01 and Mines Act Permit M-243 were amended on May 14 and June 1, 2024, respectively to expand the certified project boundaries and permitted mine areas at the mine site to add additional mining and surface infrastructure areas. The EAC amendment also expanded the certified project boundaries for additional potable groundwater wells. Air Permit 107025 was amended

May 16, 2024, to add the core saw room dust collector within the mill as an additional authorized discharge and approve minor permit changes.

Community Engagement and Development:

Employment Opportunities and Community Benefit Agreements (CBAs):

- Newmont encourages and shares employment opportunities within local communities.
- The CBAs aim to facilitate community development and provide long-term benefits that reflect the interests and circumstances of these communities.

Meetings and Engagements:

- Brucejack mine staff met three times with the Nisga'a Nation during 2023-2024 to discuss mine operations and authorizations.
- In 2024, Brucejack's social performance department had over 65 engagements with the Nisga'a Nation, Tahltan, and Tsetsaut/Skii Km Lax Ha members. These engagements included community events, meetings, career fairs, recruitment sprints, and cultural celebrations.
- An annual Wildlife Advisory Committee meeting was held October 2024.
- Monthly employment opportunities were shared with the Nisga'a Nation, Tahltan, NEST, and Tsetsaut/Skii Km Lax Ha.

Consultations and Reports:

- Consultations with Aboriginal groups occurred through referrals of various applications and reports, including:
 - 2023 Economic and Social Effects Mitigation Plan (ESEMP) Annual Report
 - 2023 Annual Report for Mines Act Permit M-243 and Environmental Management Act Permits PE-107835 and PA-107025
 - 2023 CEAA Annual Report
 - 2023 Air Quality Monitoring Results report for the Tsetsaut/Skii Km Lax Ha lodge
 - 2023 Brucejack Access Road SUP S25923 Maintenance Plan and Works Summary
 - Wildlife Advisory Committee annual meeting materials

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 comment 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 2024 Economic and Social Effects Mitigation Plan Annual Report (Pretium 2024f), 2024 Air Quality Monitoring Results for the Tsetsaut/Skii Km Lax Ha Lodge (Pretium 2024a), 2024 Annual Glacier Ablation Monitoring Report (Pretium 2024b), 2024 Annual Report for *Mines Act* Permit M-243 and *Environmental Management Act* Permits 107835 and 107025 (including updated management plans; (Pretium 2024c), 2023 CEAA Annual Report (Pretium 2024e), 2024 Brucejack Access Road SUP S25923 Maintenance Plan and Works Summary (Pretium 2024d), 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 these authorizations and for applications that were submitted or were ongoing during 2024. The latter included an application submitted July 19, 2024, to amend EAC M15-01 for access road improvement locations and communications towers, a supplemental potable groundwater well license application, a Joint Application to amend Effluent Discharge Permit 107835 and Mines Act Permit M-243 for mine plan and effluent discharge limit changes, and an additional minor amendment of Effluent Discharge Permit 107835 for oil water separator discharge.

Consultation with Aboriginal groups occurred during 2024 for revisions to the Wildlife Management Plan. The Plan was updated in 2024 and is included in Appendix 3 of the 2024 Annual Report for *Mines Act* Permit M-243 and *Environmental Management Act* Permits PE-107835 and PA-107025 (Newmont, 2023). Updated versions of the Economic and Social Effects Mitigation Plan, Aboriginal Consultation Plan, Metal Leaching Acid Rock Drainage Management Plan, Air Quality Management Plan, Wildlife Management Plan, Avalanche Management Plan, Waste Management Plan, Water Management-Operations, Maintenance and Surveillance Manual (OMS Manual), Mine Emergency Response Plan, Aquatics Effects Monitoring Plan, Chemical and Materials Storage and Material Handling Plan, Reclamation and Closure Plan, Ventilation Plan, Closure UG Water Quality and Adaptive Management Plan, and Surface Erosion Prevention and Sediment Control Plan were included as part of the 2023 Annual Report for *Mines Act* Permit M-243 and *Environmental Management Act* Permits 107835 and 107025 (Pretium 2024c) 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 Brucejack responses are summarized relative to relevant Decision Statement condition in Sections 4.1 through 4.6 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 2024. There were eight nitrate non-compliances with BC *Environmental Management Act* Effluent Discharge Permit 107835 during 2024. The most likely cause of the exceedance is a result of the use of explosives, specifically emulsion, which is a requirement during underground operations. The ammonia and nitrate in the explosives, which is highly soluble, is transferred to the waste rock, tailings, and water treatment plant effluent deposited into the WRTSF; therefore, discharged through the effluent discharge location. The increased addition of waste rock to the WRTSF to remain in compliance with the maximum 2-year of waste rock storage in surface stockpiles as per the BC EMLI authorization (M-243) is also likely a cause of the exceedance. There is currently no treatment technology at the site to manage the nitrate concentrations. Regarding the nitrate results, investigations point to several factors. Current indications suggesting a connection to emulsion handling underground and the introduction of freshly blasted underground waste rock to the surface for subaqueous deposition into the WRTSF. Brucejack exceeded the M-243 Condition D.3.(c)(v) limiting the period of time that waste rock may be temporarily stored on surface to no longer than two years and received a Section 35 order to place the waste rock into the WRTSF by November 1, 2024. To meet this Order, increased deposition occurred in 2023 to deplete the WP1 waste stockpile. Increased deposition in 2024 is likely the largest contribution to the higher nitrate concentrations observed in the effluent discharge. However, modelling shows nitrate concentrations will continue to rise for some time. Due to this, the internal working group will continue investigation, mitigations, and planning towards decreasing nitrate concentrations. The concentrations of other parameters in all eight samples were typical of water quality at BJ 3.10, with no spills or unusual events reported prior to those dates that could have caused an increase. Nitrate remained below B.C. water quality guideline for Freshwater Aquatic Life (Short-term Acute) of 32.8 mg/L. Nitrate also remained below B.C. Water quality guideline for Freshwater Aquatic Life (Long-term Chronic; 3.0 mg/L) at sample site SC0 located downstream of BJ 3.10. Furthermore, based on the current nitrate concentrations at BJ 3.10 there have been no observed adverse effects as per the acute toxicity testing.

Newmont 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 Newmont 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 was submitted in July 2024. The fourth Interpretive Report will be submitted in 2026.

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 2024.

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 2024. 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 a MetOne Instruments E-BAM 9800). Ambient Nitrogen Dioxide (NO₂) and Sulphur Dioxide (SO₂) were measured monthly with the PASS sampler. Every quarter, 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 2024 air quality monitoring results at the Tsetsaut/Skii Km Lax Ha Lodge was provided to the Nisga’a Nation and Tsetsaut/ Skii Km Lax Ha in February 2025.

Annual average concentrations during 2024 for NO₂, SO₂, CO and both particulate matter fractions at the Tsetsaut/Skii Km Lax Ha Lodge were well below their respective benchmarks. The 2024 SO₂ results were comparable to 2023, while 2024 NO₂ results were lower than 2023.

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 – 2024 were below Canadian Ambient Air Quality Standards of the Canadian Council of Ministers of the Environment benchmarks. The report regarding 2024 monitoring results at the Lodge was provided to the Nisga’a Nation and Tsetsaut/Skii Km Lax Ha for review. No questions or comments were received in 2024 based on the 2023 Air Quality Monitoring Report. Any future request for consultation on results of monitoring will be followed up by Newmont.

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 as well as materials and equipment storage. This continued through 2024.

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 2024.

4.4 CONDITIONS 6.6 AND 6.7

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 2024. Discussions regarding site access occurred with Skii Km Lax Ha for traditional use activities occurred in 2024.

(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, allowing First Nations people to use the Brucejack Access Road for traditional activities, was reviewed in 2015 during the *Mines Act/Environmental Management Act* Permits Application process. No comments were received from the Nisga'a Nation during this review or after its referral in the 2018 Annual Report. Wildlife related revisions were discussed in the 2019 Wildlife Advisory Committee meeting. One request for site access for traditional use activities or to exercise the rights afforded to the Nisga'a nation were made and granted in 2024.

4.5 CONDITION 6.8 AND 7.1

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, October 2023 and October 2024. 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 2024 Brucejack Wildlife Advisory Committee (WAC) meeting, committee members discussed action items from the 2023 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 any mortalities along the access road, including their causes.

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

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, were 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. Both bones were sent to André E. Lalonde AMS Laboratory for Radiocarbon dating and determined to be modern with calibrated date ranges between 1959 and 1984 and most likely dating to the 1980s. No archaeological or heritage site chances finds were identified in 2024.

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 archaeological finds due to limited sediment development and moderate steeply sloped terrain. Surface exposures were examined throughout the assessment areas and found no indication of archaeological material. This proposed

project has not advanced in 2024. No additional archeological or heritage material were identified in 2024.

4.6 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 Brucejack 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 Brucejack 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, Brucejack 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 Brucejack 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, Brucejack suggested that the Impacts and Benefits Agreement (IBA) between Brucejack 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, Brucejack 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. Brucejack 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 Brucejack 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 Newmont's Vancouver office (formerly Newcrest), follow-up meetings by conference calls and until late 2018 in monthly Joint Occupational Health and Safety Committee meetings at the mine site.

In 2024, 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 2024 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 memorandum "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 was submitted in July 2024. The MDMER Fourth Biological Monitoring Study Design will be submitted to ECCC in 2026.

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: TSETSAUT/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 2024 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 2024 for NO₂, SO₂, and CO at the Tsetsaut/Skii Km Lax Ha Lodge were well below their respective benchmarks and comparable to 2023 concentrations. The 2024 results for PM₁₀ and PM_{2.5} were below the corresponding federal and provincial air quality objectives. The 2024 SO₂ results were comparable to 2023, while 2024 NO₂ results were lower than 2023.

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, Brucejack 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 2024 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.

In 2024, the most common incidental wildlife observations reported totalled 342 and included:

- 129 Black bear (38% of reports);
- 61 Moose (18% of reports);
- 47 Fox (14% of reports);
- 30 Grizzly (9% of reports);
- 23 Wolf (7% of reports);
- 14 Marten (4% of reports);
- 30 Mountain Goats (9% of reports);
- 3 Porcupine (1% of reports);
- 3 Woodrats (1% of reports); and
- 2 Lynx (1% of reports)

In comparison, the most common incidental wildlife observations reported in 2023 were:

- 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)

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 2024, black bears have been observed to be distributed along the Brucejack Access Road (BJAR) 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 and summer between the Bell Irving River valley and east of Knipple Lake.

Most Grizzly bear observations were in summer, with the remainder in fall and spring. There were no instances 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 along the Bowser River valley from BJAR Km 35 and extending to Km 55 immediately east of Knipple Camp. The remainder were observed between Highway 37 and Km 35 of the BJAR. 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 Km 70 of BJAR, with most of the 2024 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 several nutrient resources.

Wolves have been observed at multiple locations along the lower BJAR, usually from around the Km 30 until Km 58 with no sightings recorded at Brucejack camp.

Building and Waste Management Monitoring

In 2024, internal environmental audits on buildings and the mine site area were routinely conducted by Brucejack Waste Management and Environmental Department personnel. 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 64 reported wildlife observations in 2024 within the mine site area (mine infrastructure within the mining leases), exclusive of the BJAR section to the head of Knipple Glacier. A total of 10 species were recorded, including red foxes, grizzly bear, black bear, wolverine and hoary marmot. Wildlife observations along the BJAR during 2024 were previously described in the Access Road Monitoring subsection.

There were no observations of bats in the underground mine workings during 2024.

Pre-clearing Surveys

Pre-clearing surveys were conducted in the summer of 2024 by certified Qualified Professionals (QPs) from ERM. These surveys were associated with various projects undertaken during the year, such as the removal of danger trees along the length of the BJAR, bridge replacements at Km 18.5 and Km 41.8 requiring some clearing on both sides of the road, and the expansion of the Knipple laydown yard. Some smaller projects requiring pre-clearing surveys included helipad construction and the creation of trails to provide access to remote environmental sampling locations. Furthermore, bird point counts and other QP related work was also undertaken to facilitate the early stages of work for the expansion and changes to the Km 58-63 bypass that will aid in continued glacier access.

Transmission Line

In 2024, Brucejack Maintenance Department personnel conducted a visual inspection of the transmission line. Inspections are conducted 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 BJAR that require avalanche control. Brucejack 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 2024 winter season. A goat mortality survey was also conducted at the end of June 2024 just after snow melt to assess the slopes below avalanche-controlled zones for remains. No goat mortalities were observed during this survey. Details of avalanche control, monitoring methods and observability are presented every year to the Wildlife Advisory Committee.

Toad Tunnel Monitoring

Mitigation measures for protection of western toad (*Anaxyrus boreas*) along the BJAR during the annual toad migration period comprise five toad tunnels and a modified bridge that were installed in 2016 and 2017. During 2024, monitoring of toad use of the tunnels and the modified bridge was conducted. This monitoring has been conducted annually since 2017, and it is done 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 2024 between May 11 and October 17 noted the following for western toad:

- at 23.4 Km tunnel 1 toad was observed;
- at 23.8 Km tunnel 5 toads were observed;
- at 25.7 Km tunnel 183 toads were observed at the tunnel;
- at 25.85 Km tunnel 439 toads were observed at the tunnel;
- at 26 Km tunnel 132 toads were observed at the tunnel; and
- at 42 Km modified bridge no toads were observed using the crossing.

Western toad observation tallies for 2024 echoed the trend of previous years, with most individuals encountered at the Km 25.7, 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. However, amphibian populations are known to show natural demographic cycles, and year on year variance in observations is an expected outcome.

Incidents (including Wildlife Collisions/ Mortalities)

Along with the various sightings of wildlife, some incidents were reported. Some of these incidents were caused by natural phenomena such as predation: Pine Marten (*Martes americana*) killed by a fox at Knipple Camp and a cow moose that died due to predation found in the Bowser River at Km 40 off the BJAR. There was a wolf mortality caused by a moving heavy vehicle that was accidentally struck at night along the BJAR.

There were some occurrences that were reported of wildlife sightings in and around the camps, including multiple fox at Brucejack camp and Knipple camp.

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). When an animal is found deceased, an internal investigation is carried out to determine if mitigation could have prevented it. In most instances it is determined that sufficient mitigation is in force, and current 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 are strictly enforced and have resulted in few instances of mortality of small furbearers; 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 2024 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). 2024a. 2023 Air Quality Monitoring Results – Tsetsaut/Skii Km Lax Ha Lodge. Submitted March 2024.
- Pretium Resources Inc. (Pretium). 2024b. 2023 Annual Glacier Ablation Report. Submitted March 2024.
- Pretium Resources Inc. (Pretium). 2024c. 2023 Annual Report for *Mines Act* Permit M-243, Effluent Permit 107835, and Air Permit 107025. Submitted March 2024.
- Pretium Resources Inc. (Pretium). 2024d. 2023 Brucejack Access Road SUP S25923 Maintenance Plan and Works Summary. Submitted April 2024.
- Pretium Resources Inc. (Pretium). 2024e. 2023 CEAA Annual Report. Submitted March 2024.
- Pretium Resources Inc. (Pretium). 2024f. 2023 Economic and Social Effects Mitigation Plan Annual Report. Submitted January 2024.

**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 2024CEAA Annual Report Section 3.
2.2		The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:	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. Specific to this Decision Statement, consultation is required in relation to: <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 These consultation requirements have been met as outlined in the table entries below, specific to each relevant condition.
	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 2024 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 2024 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 2024 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 2024 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 2024 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 2024.
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 Newmont's website at: https://operations.newmont.com/north-america/brucejack-canada
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 are provided 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. The MDMER Third Biological Monitoring Study Design was submitted to ECCC on March 14, 2023, and final report was submitted in July 2024. The MDMER Fourth Biological Monitoring Study Design will be submitted to ECCC in 2026.
	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. In addition, 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 2024.
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 2024 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 2024 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</i> , 1994 and with the <i>Species at Risk Act</i> .	Danger tree clearing along the BJAR was performed in 2024 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 2024, 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 2024, 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 2024 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 2024 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 2024. No exceedances were noted in the Tsetsaut Skii Km Lax Ha Lodge results. A report was provided in February 2025.
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, March 12, 2023, and March 2025.
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 snowbanks were constructed and maintained along the access road for the 2023/2024 winter season. Additionally, for much longer sections of the road, a grader was used to cut down the height of the snowbanks 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 2024 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 2024 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 2024 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 2024 CEAA Annual Report Section 4.5 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 2024.
	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 2024.
	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 2024.
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 2024 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 adviceuse the Resource Inventory Standards Committee (RISC) Inventory Methods for Bats which describe 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.

Section	Sub-section	Condition	Implementation Activities Undertaken
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. In 2024, 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.
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 2024.
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 2024; 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 2024 CEAA Annual Report Section 4.6
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 2024.
	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 2024.
	9.3.2	Implement immediate measures to minimize any adverse environmental effects associated with the accident or malfunction;	Not applicable; no such occurrence in 2024.
	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 2024.
	9.3.3.1	A description of the accident or malfunction and of its adverse environmental effects;	Not applicable; no such occurrence in 2024.
	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 2024.
	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 2024.
	9.3.3.4	If an emergency response plan was implemented, details concerning its implementation.	Not applicable; no such occurrence in 2024.
	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 2024.
		The Proponent shall develop and implement a communication plan, in consultation with Aboriginal groups, that shall include:	Refer to 2024 CEAA Annual Report Section 4.6.
	9.4.1	The types of accidents or malfunctions requiring a notification by the Proponent to the respective Aboriginal groups;	Refer to 2024 CEAA Annual Report Section 4.6.
	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 2024 CEAA Annual Report Section 4.6.
	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 2024 CEAA Annual Report Section 4.6.

Section	Sub-section	Condition	Implementation Activities Undertaken
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, March 12, 2023, and March 2025.
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, March 12, 2023, and March 2025 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 2024.
	11.1.2	The dates and the analyses that were performed;	This practice continued during 2024.
	11.1.3	The analytical techniques, methods or procedures used in the analyses;	This practice continued during 2024.
	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 2024.
	11.1.5	The results of the analyses.	This practice continued during 2024.
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 Newmont's offices in Vancouver.