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## B.1 – INTRODUCTION

### B.1.1 PROJECT ASSESSMENT TIMELINE

Casino Mining Corporation (CMC) submitted a Project Proposal under the *Yukon Environmental and Socio-economic Assessment Act* (YESAA) to the Yukon Environmental and Socio-economic Assessment Board (YESAB) on January 3, 2014. The Project Proposal contained five volumes and 25 chapters of documentation to support the assessment of the Project under the YESAA regulations. As production capacity of the proposed Project is greater than 300 tonnes per day, the Project is subject to an Executive Committee Screening for the proposed construction, decommissioning and closure activities.

On May 23, 2014, CMC requested that YESAB place the review of the Project on hold for up to 180 days to enable CMC to continue engagement with affected First Nations. YESAB granted the request on June 2, 2014. The hold period was lifted on November 27, 2014, and YESAB issued the *Adequacy Review Report: Project Assessment 2014-0002, Casino Mine* on January 27, 2015.

CMC submitted a response to that Adequacy Review Report on March 16, 2015, in the form of a Supplementary Information Report (SIR-A) for evaluation by YESAB. After review of the SIR-A, YESAB issued *Adequacy Review Report Information Request No.2: Project Assessment 2014-0002, Casino Mine* (ARR-2) on May 15, 2015.

This Supplementary Information Report (SIR-B) has been written to respond to ARR-2. The information contained in SIR-B supplements information previously provided in the Project Proposal, and in Supplementary Information Report (SIR-A) submitted on March 16, 2015. There have been no changes to the conclusions of potential effects and determinations of significance presented in the Proposal.

### B.1.2 STAGES OF PROJECT DEVELOPMENT

CMC urges the Executive Committee to allow the environmental assessment to begin. CMC has made every effort to involve stakeholders in the development and evolution of the Casino Project over the 8 year project development process. Almost \$70 million dollars have been spent and considerable effort has been made, all with a view to responsibly develop the Casino Project. These efforts commenced in 2008 and have continued throughout the environmental assessment and include:

- Early and frequent meetings with identified First Nation Governments;
- Three Cooperation Agreements signed between CMC and the Selkirk First Nation, Little Salmon/Carmacks First Nation, and Tr'ondëk Hwëch'in and commitments to ongoing engagement;
- Pre-submission meetings with YESAB;
- On-going Project Updates with Yukon Government and Federal Government; and
- Regular updates to the public and land tenure holders on Project development.

The Casino Project has consequently evolved over the duration of these consultations to take into consideration the concerns and feedback of these stakeholders to refine the Project components to be the most acceptable from an environmental and socio-economic perspective. These refinements include:

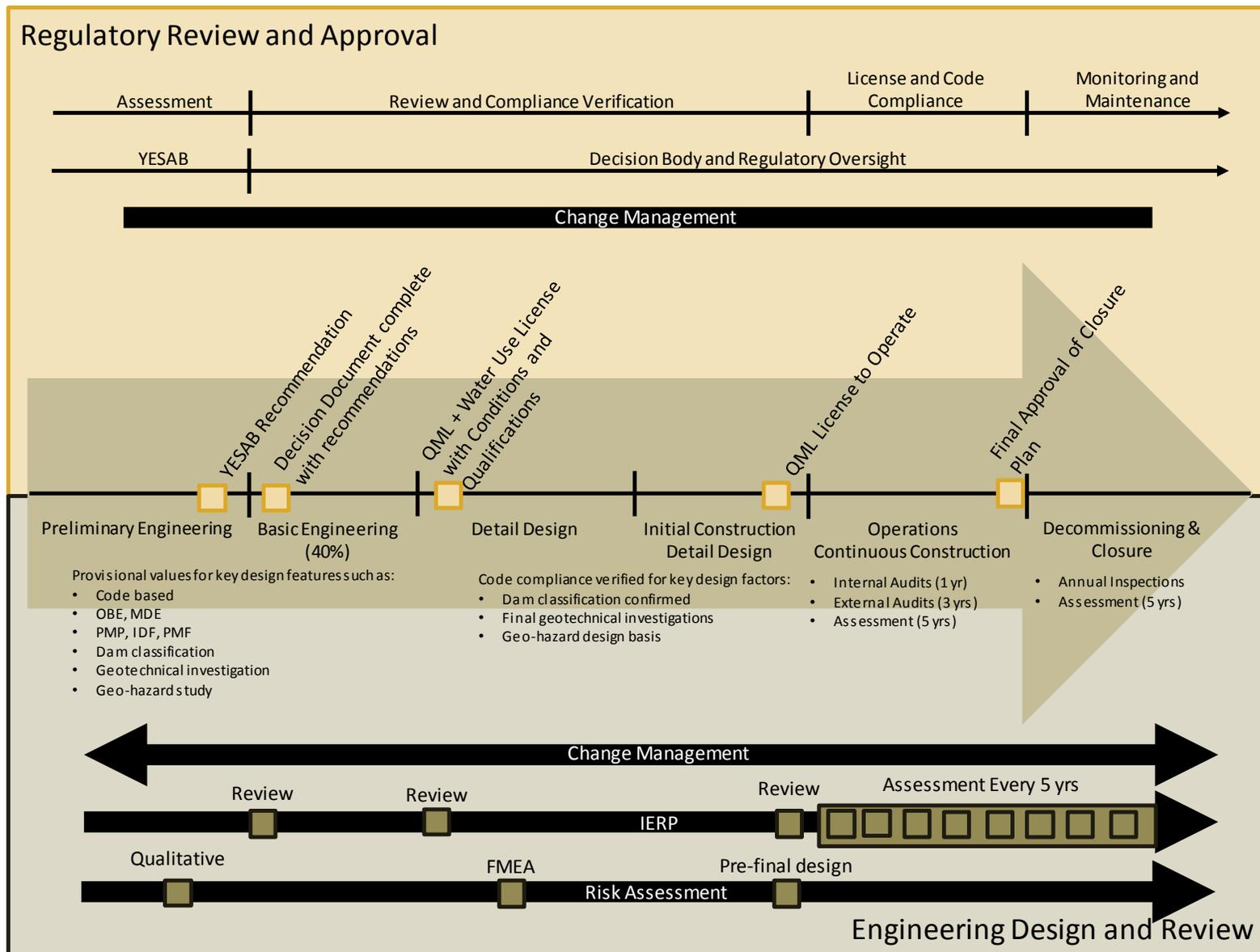
- Positioning the road route to avoid areas of importance to First Nations;
- Minimizing the Project footprint to avoid impacts to the Yukon River;

- Placement of all Project infrastructure in a single watershed with zero discharge during operations and a single, controlled point of discharge during closure;
- Mine waste disposal in a single facility to minimize impacts to fish bearing aquatic systems;
- Subaqueous co-disposal of tailings and waste rock in accordance with metal leaching/acid mine drainage prevention best management practices;
- Incorporation of proven treatment systems to ensure environmental protection in perpetuity; and
- Advancing project engineering to a feasibility study level prior to the Submission of the Project Proposal to ensure that the proposed project is technically viable.

CMC has also committed to the on-going incorporation of environmental and socio-economic oversight beyond the environmental assessment phase through the following initiatives:

- **Independent Engineering Review Panel (IERP):** The purpose of IERP is to provide independent expert advice on the engineering design, construction, operations and closure planning stages of the tailings management facility (TMF) and heap leach facility (HLF). While CMC has voluntarily created the IERP for the Casino Project, independent tailings dam review boards have become mandatory for **operating** mines in British Columbia, and guidance for independent audits or assessments are outlined by the Mining Association of Canada in their *Guide to the Management of Tailings Facilities*, also intended for operating facilities.
- **The International Cyanide Management Code (ICMC):** As a signatory, CMC will comply with the Principles and Standards of Practice that make up with ICMC. Once operational, CMC will seek certification in compliance with the ICMC, which will require meeting performance goals and objectives as detailed by the International Cyanide Management Institute.
- **The Mining Association of Canada (MAC):** As a member, CMC will meet the guiding principles of the Towards Sustainable Mining (TSM) initiative, thereby obtaining the highest level of environmental and social commitments for modern mining companies in Canada. Through the TSM initiative, CMC will provide communities with valuable information on how its operation is faring in important areas, such as community outreach, tailings management, and biodiversity.
- **Stakeholder engagement:** CMC will initiate working groups for the continued involvement of affected First Nations, Territorial and Federal Governments and communities of interest throughout the detailed design, construction, operations and closure phases, including:
  - **TMF Working Group:** a working group to engage in technical review and discussion relating to the design and operation of the Tailings Management Facility;
  - **Wildlife Working Group:** a working group to review and provide advice on all aspects of the Wildlife Mitigation and Monitoring Plan; and
  - **Other Groups:** CMC will initiate other working groups, as required, to review and provide insight on key components of the Project.

The process of corporate and regulatory review, approval, and oversight is illustrated in Figure B.1.2-1.



**Figure B.1.2-1 Corporate, Regulatory and Engineering Review throughout Mine Life**

### B.1.3 GENERAL PRINCIPLES OF THE ASSESSMENT PROCESS

CMC recognizes and values the YESAB assessment process and the importance of this process in protecting the environmental and socio-economic values of all residents of the Yukon. The process provides valuable input to CMC for consideration as the project moves through successive stages of development.

A common understanding of what constitutes assessment and what information is required to support the assessment process is essential for this process to be effective for the proponent, YESAB, the Yukon Territory, and more broadly, Canada.

The general purpose and intent of the assessment process, as described in various jurisdictions, is an early stage project development process that is intended to predict the potential environmental impacts, environmental impact mitigation strategies, and socio-economic benefits of a given project to assess the trade-offs and balancing of interests to arrive at a judgement as to the overall merit of the proposed project in the interest of the community at large and to make a recommendation that the project, on its merits, should or should not proceed to subsequent detailed regulatory reviews and potential development.

This general assessment philosophy mirrors the principles expressed to CMC by YESAB, portrayed on the YESAB website, and conveyed in documents such as *Dam Guide: Design Expectation and Required Information* (YESAB and Yukon Environment, 2012) and the *Proponents Guide to Information Requirements for Executive Committee Project Proposal Submissions* (YESAB, 2005). It is clear from these documents and communications that there is an understanding and recognition within YESAB that projects undergo an evolution from the conceptual or preliminary design phase through basic and detailed engineering, course of construction verification and modification, and finally documentation of the as-built project. It is also evident that the information needs and the availability of information pertinent to the operational phase and post-operational phase have a timeline distinct from the design and construction phases. *The Dam Guide: Design Expectation and Required Information*, for example, recognizes that the level of design, data, and supporting information available and required for review varies at each distinct stage. The assessment process is part of a broader regulatory review framework.

### B.1.4 REGULATORY REVIEW FRAMEWORK

CMC recognizes that project review and approval requires meeting the requirements of a multi-stage regulatory process (as illustrated in Figure B.1.2-1), including:

- **Environmental Assessment:** After screening and/or review (during which there are additional information request opportunities), the Project would only be allowed to proceed subject to specified terms and conditions to mitigate any adverse environmental or socio-economic effects. A conceptual level of design information is generally appropriate for the environmental assessment stage (see *Dam Guide – Design Expectations and Required Information* discussed below).
- **Decision Bodies:** The decision bodies must consider the recommendations resulting from the environmental assessment under the YESAB and issue a Decision Document determining whether the project should be allowed to proceed, subject to meeting terms and conditions for the mitigation of any potential adverse environmental or socio-economic effects. If the decision bodies allow the project to proceed under the terms and conditions of a Decision Document, then regulatory agencies such as the Yukon Water Board (YWB) and the Yukon Government Department of Energy, Mines and Resources

(EMR), and CMC, as the proponent, will be required to implement the terms and conditions of the Decision Document in any licences or other regulatory authorizations.

- **Application for a Quartz Mining Licence (QML) under the Quartz Mining Act:** *The Plan Requirement Guidance for Quartz Mining Projects*, August 2013, is applicable to applications for a QML. While a public hearing is not required, the application for a QML will be reviewed and considered in detail by EMR. Again, more detailed design information will be required from CMC, as the proponent, to support the application for a QML.
- **Application for a Type A Water Licence to the YWB:** Under the terms of the Waters Act, the YWB must not issue a Water Licence unless the proponent satisfies the YWB that any waste that would be produced will be treated and disposed of in a manner that is appropriate to the maintenance of water quality standards, and effluent standards considered acceptable by the YWB for the protection of water quality. The YWB must hold a public hearing for a Type A Water Licence. More detailed design information will be required from CMC, as the proponent, to support the application for a Water Licence.

The Water Licence and the QML, if issued, will each include detailed terms and conditions requiring submission of final design drawings and as-built drawings for review before commencing construction and operation of a project.

Guidelines and information requirements issued in relation to the YESAB process, the licencing application processes under the Waters Act and the Quartz Mining Act, and the terms of Quartz Mining Licences and Water Licences, provide for increased levels of design information as a project moves through the process.

One such example, is *The Dam Guide – Design Expectations and Required Information*, issued by YESAB and Yukon Environment, which indicates as follows with respect to design information:

- Generally, a conceptual level of design information is appropriate for the assessment stage. The greater the potential effects/risks of a dam, or effects related to its potential failure, the more detailed the information will need to be (Dam Guide, page 4). We acknowledge that the dam proposed for the Casino Project is a significant structure, but its design will be subject to detailed review at the licence application stage and the regulatory compliance stage, we ask that YESAB take into account the progression from conceptual design, to preliminary design, and ultimately to final design, within the regulatory processes and authorities in Yukon.
- Regulatory agencies (such as the YWB or the MEMR) require more detailed design information. The YWB and the EMR will require preliminary designs of infrastructure as part of licence applications (Dam Guide, pages 5 and 6).
- The Quartz Mining Licence and the Water Licence will include terms and conditions requiring the filing of final design drawings and as-built design drawings for review prior to construction (Dam Guide, page 6).

EMR states as follows (website) with respect to the relationship between the environmental assessment process and the regulatory process:

*“The Yukon Government works with the proponent and YESAB on the integration of the assessment and regulatory requirements.”*

Coordination between YESAB, EMR and the YWB should result in the appropriate level of engineering design being required at each stage of the environmental assessment, licencing, and regulatory compliance phases of the process.

Under the *Plan Requirement Guidance for Quartz Mining Projects*, August 2013, issued by the YWB and EMR, a Tailings Management Plan is required, including “design details for all facilities related to tailings storage and management”, including tailings dams, tailings handling facilities and equipment, contaminated water management facilities, water treatment facilities, and surface water management facilities. Section 14.3 of the *Plan Requirement Guidance* specifies that:

*“Design and construction plans must account for site-specific conditions including adverse geotechnical conditions and extreme climatic events. Designs must demonstrate how the proposed facilities will meet the design criteria and that they will be stable both during construction and in the long term.”*

Designs for all tailings storage facilities must include, among others: foundation conditions; site preparation; construction quality assurance/quality control; stability and settlement analyses; construction schedules; surface water management; liner systems; borrow sources; soil storage; and access management.

The *YWB Information Package for Applicants for Type A and B Quartz Mining Undertakings*, February 2012, provides guidance with respect to the information requirements of the Water Board with respect to Type A Water Licences. These include, in Section 5.8:

*5.8 submit preliminary designs of site-specific project components of relevance to water use and waste deposition, including mining and mineral processing infrastructure, water management infrastructure, and mine waste emplacements. For clarity the Board considers that the preliminary design stage builds upon feasibility and/or conceptual studies required to determine the desirability of proceeding with a particular project. The objectives of preliminary designs submitted to the Board are:*

- i. to provide evidence that the proposed project component can satisfy its desired function in the normal and extreme operational and environmental conditions it will be exposed to throughout the life cycle of the component; and*
- ii. to show compliance with relevant standards or guidelines, including hazard or risk classifications that may apply to that class of infrastructure, whether that is for human health and safety or environmental protection.*

In our discussions with staff of YESAB, we have emphasized that the review process in Yukon, from environmental assessment through licence applications and into regulatory compliance under the terms of licences, contemplates that the design of project components will progress from conceptual design, to preliminary design, to final design.

Additionally, the Project will be subject to detailed regulatory review and conditions. As an example, with respect to fish and aquatic resources, compliance with the Fisheries Act, and DFO authorizations, will be required for activities such as watercourse crossings which may affect fish or fish habitat. Details respecting the protection of fish and fish habitat and the appropriate mitigation measures will be addressed at the regulatory stage to ensure protection. Similarly, the YWB has a mandate to ensure protection of water quality, and both the YWB and EMR have mandates to review and regulate structural components of the project.

As such, in our responses to certain information requests in SIR-A, and again in SIR-B, we have responded to certain requests for design information by indicating that preliminary designs and final designs will only be

available at the licence application stage and the licence compliance stage, and those designs will be subject to extensive review by the YWB and EMR, which each have regulatory authority and oversight.

## B.1.5 RESPONSES TO INFORMATION REQUESTS

In the process of responding to YESAB's requests for additional information, CMC has identified the following trends in those requests:

- **Consideration for the stage of project development:** CMC is providing information representative of the planned Casino Mine Project commensurate and appropriate with the stage of review. The purpose for presenting preliminary design information is to allow assessors to determine if the presented design meets the necessary environmental and socio-economic protection objectives of the YESAA and meets the expectations of the decision bodies with respect to modern mining operations. Detailed engineering needs to be based on the optimized design outcomes of the environmental and socio-economic assessment process.

In many instances, requests submitted in the ARR-2 require information that can only be developed in later stages of project development, such as detailed engineering or during the course of construction. As the project progresses through design, construction and into operations, it will undergo a number of reviews by regulatory agencies. Significant facilities, such as the HLF and TMF, will also be subject to review by external independent entities. These reviews will be detailed and continuous.

YESAB must take into consideration that the information to respond to certain requests is simply not available and cannot be obtained at this stage of project development.

- **Legislative over-reach and duplication:** There are many examples in the ARR-2 where information requested is a requirement for permitting and licensing of a particular facility or system subsequent to assessment under YESAA and will be provided at the appropriate time. The design, construction, and operation of such facilities or systems are the responsibility of other regulatory agencies and will be subject to separate regulatory review at a later stage of project development. The assessment stage should focus on the conceptual design and should assume the project will comply with the pertinent regulation.

CMC will provide the detailed requirements under all applicable Territorial and Federal Acts and Regulations when it submits the application for specific permits or licences. The final designs will be consistent with the Project design and environmental protection measures recommended by YESAB at the culmination of the YESAA process.

Information provided to date by CMC is based on conceptual and preliminary designs, information from test work or field investigations, and is consistent with early stage project development. There are many instances where the level and extent of the information provided goes well beyond what is typically provided for assessment purposes.

We ask that the Executive Committee take these regulatory stages into account in finding the appropriate balance and integration of the information required in the environmental assessment and subsequent regulatory requirements respectively.

In light of the above, CMC has attempted to respond to ARR-2 in the most fulsome manner, with the details and data available at this phase of project development. CMC will continue to provide information as requested

throughout the Screening phase of the YESAB assessment to fulfill the needs of YESAB, decision bodies and interested persons participating in the assessment and looks forward to commencing the assessment process in a timely manner.

## B.1.6 ORGANIZATION OF THE SIR-B

The SIR-B consists of four volumes of information, 17 sections and numerous detailed technical appendices. In order to simplify the review process, the SIR-B has been laid out using the same structure as the Project Proposal and the SIR-A. The section names in the SIR-B have remained consistent (e.g., Section 7 – Water Quality) with the other submissions, but the letter “B” has been added as a prefix to all section numbers and appendices. By comparison, section numbers and appendices in the SIR-A were prefaced with the letter “A”.

The purpose of the SIR-B is to provide supplementary information to support the initial risk assessment, and not to re-conduct the risk assessment process. Conclusions made regarding the significance of effects made in the Project Proposal are still applicable to the proposed Project.

For additional clarity, below is a Document Map of the SIR-B, which offers an “at a glance” directory of the material found in each section, within each volume, with their pertinent appendices. In addition, cumulative document maps which summarize the submissions for each volume throughout the Project Proposal, SIR-A and SIR-B are also provided below to help simplify the review process.

## B.1.7 SUMMARY OF CHANGES TO THE PROJECT PROPOSAL

No changes to the Project Proposal have been made based on the information provided in the SIR-B.

## VOLUME B.I: PROJECT INTRODUCTION & OVERVIEW

### B.1 Introduction

**B.1A** Concordance Table to the Executive Committee's Request for Supplementary Information

### B.2 First Nations and Community Consultation

### B.4 Project Description

**B.4A** Guide to the Management of the Casino Tailings Facility

**B.4B** Mine Waste Management Alternatives Assessment

**B.4C** Tailings Management Facility Dam Breach Inundation Study

**B.4D** Tailings Management Operation, Maintenance and Surveillance Manual

**B.4E** 2014 and 2015 Geotechnical Testing of Leach Ore

**B.4F** Ore Characterization

**B.4G** Review and Updates to the Conceptual Wetland Water Treatment Design

## VOLUME B.II: BIOPHYSICAL VALUED COMPONENTS

### B.6 Terrain Features

**B.6A** Tables and Figures from Appendix 6E

### B.7 Water Quality

**B.7A** Surface WQ Statistics

### B.8 Air Quality

**B.8A** Air Quality Results (digital)

### B.9 Noise

### B.10 Fish and Aquatic Resources

### B.11 Rare Plants and Vegetation Health

### B.12 Wildlife

## VOLUME B.III: SOCIO-ECONOMIC VALUED COMPONENTS

### B.14 Employability

### B.15 Economic Development and Business Sector

### B.16 Community Vitality

### B.18 Cultural Continuity

**B.18A** Heritage Resource Management Plan

## VOLUME B.IV: ADDITIONAL YESAA REQUIREMENTS

### B.21 Accidents and Malfunctions

### B.24 Conclusions

### B.25 References

# PROJECT INTRODUCTION & OVERVIEW

## VOLUME II:

(January 2014)



## VOLUME A.II:

(March 2015)



## VOLUME B.I:

(December 2015)

### 1 Introduction

### 2 First Nations and Community Consultation

2A Consultation Log

2B Consultation Materials

### 3 Project Location

### 4 Project Description

4A Conceptual Closure Plan

4B Freegold Road Report

4C Water Management Plan

### 5 Effects Assessment Methodology

5A Project Components & Activities List

5B Cumulative Effects Assessment List

### A.1 Introduction

A.1A Concordance Table to the Executive Committee's Request for Supplementary Information

### A.2 First Nations and Community Consultation

A.2A Traditional Knowledge Bibliography

### A.3 Project Location

### A.4 Project Description

A.4A Tailings Management Facility Construction Material Alternatives

A.4B Information on Alternative Access Road Alignments

A.4C Feasibility Design of the Heap Leach Facility

A.4D Report on the Feasibility Design of the Tailings Management Facility

A.4E Results of Additional Lab Testing of Leach Ore

A.4F Waste Storage Area and Stockpiles Feasibility Design

A.4G Updated Hydrometeorology Report

A.4H Cold Climate Passive Treatment Systems Literature Review

A.4I Open Pit Geotechnical Design

A.4J Laboratory Evaluation of the SO<sub>2</sub>/Air and Peroxide Process

A.4K Metal Uptake in Northern Constructed Wetlands

A.4L Revised Tailings Management Facility Seepage Assessment

A.4M Processing Flow Sheets

A.4N Scoping Level Assessment of Casino Property

A.4O Advanced Metallurgical Assessment of the Casino Copper Gold Project

A.4P Production of Environmental Tailings Samples for the Casino Deposit

A.4Q Mine Site Borrow Materials Assessment Report

A.4R Report on Laboratory Geotechnical Testing of Tailings Materials

### A.5 Effects Assessment Methodology

### B.1 Introduction

B.1A Concordance Table to the Executive Committee's Request for Supplementary Information

### B.2 First Nations and Community Consultation

### B.4 Project Description

B.4A Guide to the Management of the Casino Tailings Facility

B.4B Mine Waste Management Alternatives Assessment

B.4C Tailings Management Facility Dam Breach Inundation Study

B.4D Tailings Management Operation, Maintenance and Surveillance Manual

B.4E 2014 and 2015 Geotechnical Testing of Leach Ore

B.4F Ore Characterization

B.4G Review and Updates to the Conceptual Wetland Water Treatment Design

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# BIOPHYSICAL VALUED COMPONENTS

## VOLUME III:

(January 2014)



## VOLUME A.III:

(March 2015)



## VOLUME B.II:

(December 2015)

### 6 Terrain Features

- 6A** Surficial Geology, Terrain and Soils Baseline
- 6B** Terrain Hazards Assessment for Proposed Access Roads and Airstrip
- 6C** Preliminary Geotechnical Study
- 6D** Terrain Hazards Assessment for Proposed Mine Site
- 6E** Fluvial Geomorphology Hazard Assessment for Proposed Access Roads

### 7 Water Quality

- 7A** Water and Sediment Quality Baseline
- 7B** Baseline Hydrology Report
- 7C** 2012 Baseline Hydrogeology Report
- 7D** Geochemistry Reports
- 7E** Numerical Groundwater Modelling
- 7F** Water Balance Report
- 7G** Water Quality Model Report
- 7H** Project Effects on Water Quantity

### 8 Air Quality

- 8A** Baseline Climate Report
- 8B** Met, Dustfall, and Noise Data Summary Report 2011
- 8C** Air Quality Baseline 2013

### 9 Noise

### 10 Fish and Aquatic Resources

- 10A** Fish and Aquatic Resources Baseline Report
- 10B** Freegold Road Fish and Aquatic Baseline
- 10C** Preliminary Fish Habitat Compensation Plan
- 10D** Freegold Road Extension S&EC Risk Assessment

### 11 Rare Plants and Vegetation Health

- 11A** Vegetation Baseline Report

### 12 Wildlife

- 12A** Wildlife Baseline Report
- 12B** Bird Baseline Report

### A.6 Terrain Features

### A.7 Water Quality

- A.7A** Variability Water Balance Model Report
- A.7B** Water Quality Predictions Report
- A.7C** Potential Effects of Climate Change on the Variability Water Balance
- A.7D** Updated Appendix B5 to Appendix 7A
- A.7E** 2008 Environmental Studies Report: Final
- A.7F** The Effect of Acid Rock Drainage on Casino Creek
- A.7G** Toxicity Testing Reports
- A.7H** Appendix A2 to Casino Waste Rock and Ore Geochemical Static Test Assessment Report: Cross-Sections
- A.7I** Casino Kinetic Testwork 2014 Update for Ore, Waste Rock and Tailings
- A.7J** Preliminary Risk Assessment Metal Leaching and Acid Rock Drainage
- A.7K** Casino Mine Site Borrow Sites ML/ARD Potential
- A.7L** Casino Geochemical Source Term Development: Appendix B
- A.7M** 2013-2014 Groundwater Data Report
- A.7N** Extension of Numerical Groundwater Modelling to include Dip Creek Watershed

### A.8 Air Quality

- A.8A** Emissions Inventory for Construction and Operations

### A.9 Noise

### A.10 Fish and Aquatic Resources

- A.10A** Updated Fish Habitat Offsetting Plan
- A.10B** Fish Habitat Evaluation: Instream Flow and Habitat Evaluation Procedure Study

### A.11 Rare Plants and Vegetation Health

### A.12 Wildlife

- A.12A** Wildlife Mitigation and Monitoring Plan V.1.2.
- A.12B** Wildlife Baseline Report V.2.
- A.12C** Moose Late Winter Habitat Suitability Report

### B.6 Terrain Features

- B.6A** Tables and Figures from Appendix 6E

### B.7 Water Quality

- B.7A** Surface WQ Statistics

### B.8 Air Quality

- B.8A** Air Quality Results (digital)

### B.9 Noise

### B.10 Fish and Aquatic Resources

### B.11 Rare Plants and Vegetation Health

### B.12 Wildlife

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# SOCIO-ECONOMIC VALUED COMPONENTS

## VOLUME IV:

(January 2014)



## VOLUME A.IV:

(March 2015)



## VOLUME B.III:

(December 2015)



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# ADDITIONAL YESAA REQUIREMENTS

## VOLUME V:

(January 2014)



## VOLUME A.V:

(March 2015)



## VOLUME B.IV:

(December 2015)

- 20** Effects of the Environment on the Project
  - 20A** Climate Change Report
- 21** Accidents and Malfunctions
  - 21A** Regulatory Setting
  - 21B** Risk Register
- 22** Conceptual Environmental Management Plans
  - 22A** Road Use Plan
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- A.20** Effects of the Environment on the Project
- A.21** Accidents and Malfunctions
- A.22** Environmental Management
  - A.22A** Waste and Hazardous Materials Management Plan
  - A.22B** Spill Contingency Management Plan
  - A.22C** Sediment and Erosion Control Management Plan
  - A.22D** Invasive Species Management Plan
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- A.21** Accidents and Malfunctions
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