

Summary of Engagement

CARIBOO GOLD PROJECT

SEPTEMBER 1, 2020

Pursuant to Section 13.5 of the Environmental Assessment Act, S.B.C. 2018, c.51



EAO

Environmental
Assessment Office

1.0 INTRODUCTION

This Summary of Engagement report has been prepared by the Environmental Assessment Office (EAO) for the Cariboo Gold Project (Cariboo Gold) being proposed by Barkerville Gold Mines (BGM). This report summarizes public comments received during the Early Engagement phase's public comment and engagement period, outlines Indigenous nations' interests in the project area, and identifies key issues and concerns from technical advisors after review of the Initial Project Description and supplemental information submitted by BGM. The purpose of this report is to inform BGM's development of the Detailed Project Description by providing a summary of comments received during the Early Engagement phase and to provide the list of participating Indigenous nations as per Section 13(5)(a) and (b) of the British Columbia (BC) *Environmental Assessment Act* (2018) (the Act), respectively.

During the Early Engagement phase, the EAO requested input from the public, potentially affected Indigenous nations, and technical advisors from provincial and federal government agencies, local governments, and health authorities to understand their preferred means of engagement and to gather their initial interests, concerns, questions, feedback, and knowledge regarding Cariboo Gold. To support engagement and feedback on the Initial Project Description, the EAO hosted two virtual public open houses and held meetings and teleconferences with technical advisors and potentially affected Indigenous nations prior to and during the Early Engagement phase.

This Summary of Engagement includes:

- a summary of comments received during the public comment and engagement period;
- input received from technical advisors on the Initial Project Description;
- a list of participating Indigenous nations who have provided notice under Section 14(1) of the Act;
- a summary of Indigenous nations' preliminary interests in the project area; and
- information and engagement requirements for the Detailed Project Description.

The EAO expects that BGM will utilize all the information received during Early Engagement, including the Summary of Engagement and detailed comments from participants, to consider and address this information, as appropriate, in a Detailed Project Description and to inform subsequent phases of the EA, should the project proceed.

The Readiness Decision phase will start after BGM submits a final Detailed Project Description. The Readiness Decision will involve the EAO's determination of whether enough information is available to start the Process Planning phase of the Environmental Assessment (EA) with key issues identified for resolution later in the EA process.

2.0 PROJECT OVERVIEW

BGM proposes to develop an underground gold mine with a production capacity of 4,750 tonnes per day (1.73 million tonnes per year), in the District of Wells, B.C. Cariboo Gold would have a proposed mine life of 12-15 years. The total capital cost, including sustaining capital, for Cariboo Gold is estimated to be at \$750 to \$800 million. Cariboo Gold is expected to have a construction personnel peak of 245 workers and an estimated 350 direct employees plus 50 contractors and consultants during operations.

For further details on the proposed Cariboo Gold Project, please see the Initial Project Description, supplemental information, Engagement Plan, and other documents on the EAO's [EPIC website](#).

3.0 EARLY ENGAGEMENT PROCESS OVERVIEW

Cariboo Gold is being reviewed by the EAO under the Act. Cariboo Gold constitutes a reviewable project pursuant to Part 3 of the Reviewable Projects Regulation (B.C. Reg. 607/19), since it is a new project and the production capacity would be greater than or equal to 75,000 tonnes per year of mineral ore.

The project description was submitted by BGM to the EAO on October 24, 2019, under the former *Environmental Assessment Act* (2002). On February 21, 2020, this project description was accepted by the Chief Executive Assessment Officer (CEAO) in complete fulfillment of the requirements of the Initial Project Description and will be referred in this report as the “Initial Project Description.” BGM provided the EAO with an Engagement Plan on May 4, 2020. The EAO issued an order under Section 13(3)(a) of the Act on May 14, 2020, accepting the Initial Project Description and Engagement Plan and formally starting the Early Engagement phase of the EA.

The Early Engagement phase is the first phase of the provincial EA process and is an important preparatory stage during which meaningful conversations can begin about a proposed project with the project proponent, Indigenous nations, the public, local governments, provincial and federal government agencies, and other stakeholders to identify potential interests, issues and concerns early in the EA process. The information gathered during the Early Engagement phase will inform the development of the Detailed Project Description and may inform subsequent phases of the EA (e.g. Process Planning that sets the scope of the EA, Application Development that allows for opportunities to review the proponent’s effects assessment prior to assessment, and Effects Assessment that assess the potential effects of a project on valued components).

This Summary of Engagement, along with the Detailed Project Description, will be provided to the CEAO to inform the Readiness Decision to either:

- proceed to an EA;
- require a revised Detailed Project Description;
- recommend the project be exempted from an EA; or
- recommend the project be terminated from the EA process.

Figure 1 below provides an overview of the EA process and key documents, highlighting where the Summary of Engagement is issued:

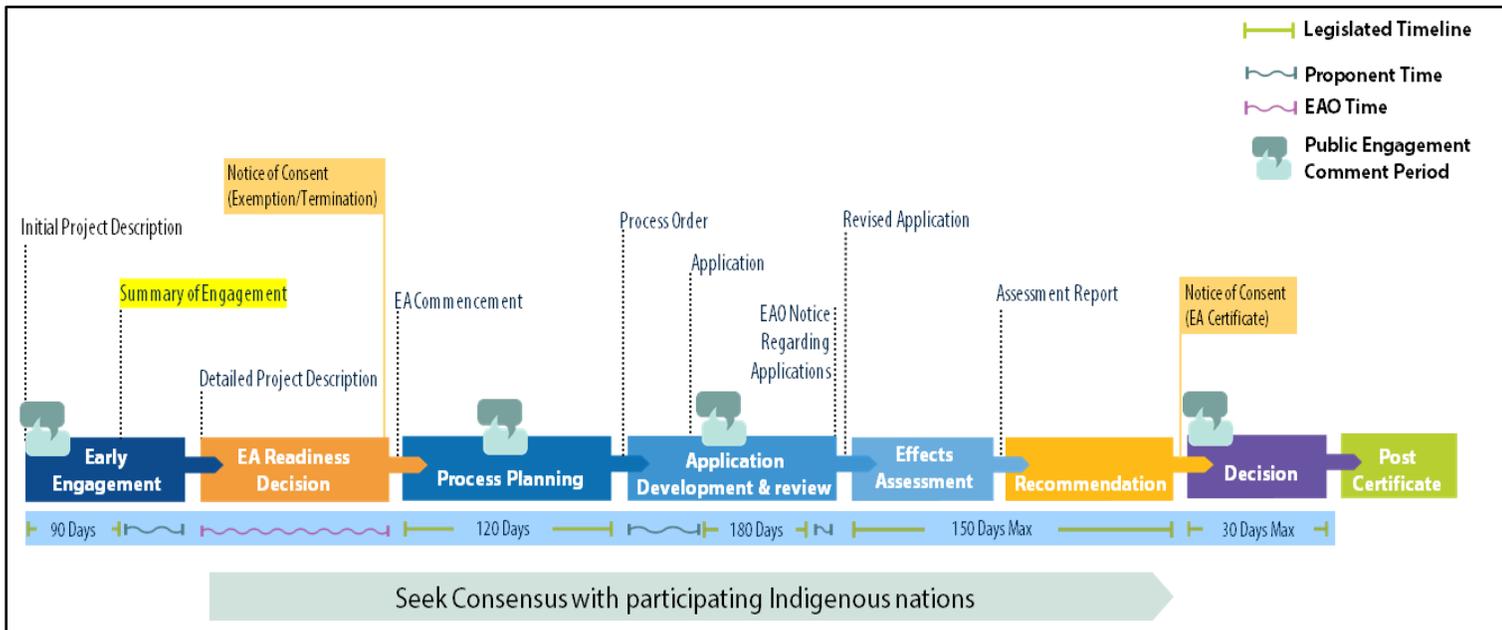


Figure 1 - EA process and key documents

For more information and guidance on the Early Engagement phase, including the EAO’s Summary of Engagement, and the Readiness Decision, please see the EAO’s guidance materials available from: [2018 Act Guidance Documents](#).

3.1. Federal Impact Assessment

The Impact Assessment Agency of Canada has determined that Cariboo Gold is not subject to review under the federal *Impact Assessment Act* since it does not meet the thresholds under Section 19(c) of the Federal Physical Activities Regulations.

4.0 PUBLIC COMMENT AND ENGAGEMENT PERIOD

The public comment and engagement period on Cariboo Gold’s Initial Project Description and supplemental information was extended from 30 days to 45 days to provide the public additional time due to the COVID-19 pandemic and was held from June 12, 2020 to July 27, 2020. In lieu of hosting an in-person open house, the EAO organized two virtual open houses on June 17 and June 23, 2020 via Skype Meeting Broadcast. A total of 99 unique computer logins attended the June 17, 2020 open house and 52 unique computer logins attended the June 23, 2020 open house.

The public comment and engagement period and virtual open houses were advertised in local newspapers and on local radio stations.

Public comments were solicited by the EAO and submissions received from the public during the public comment and engagement period are posted on the [EAO’s EPIC website](#). The EAO received a total of 57 public comments during the public comment and engagement period. All individual comments were shared with BGM to inform the development of the Detailed Project Description and further engagement. The EAO categorized the public comments received into common themes to support comprehensive responses from BGM to public comments of a similar nature. BGM is required to respond to each of the comment categories, with consideration of individual comments for context, as part of the Detailed Project Description. BGM may respond to comment categories via the inclusion of additional information, indicating any changes in project design considerations and/or indicating how these comments may inform subsequent phases of the EA. Table 1 below provides the EAO’s comment categories and a summary of public comments received during Early Engagement, with the most frequently commented on categories at the top of the table.

Table 1. Summary of Public Comments received during Early Engagement

Comment Category	Comment Summary
Surface Concentrator Plant	Potential effects on access to recreational sites for use by residents and tourists. Concerns were focused on the location of the Surface Concentrator Plant, its proximity to residential homes, and the potential effects to the tourism industry and viewscape of the area.
Northern Transmission Line Route Option	Potential effects of the Northern Transmission Line option on visual quality and potential environmental effects, including on caribou and caribou habitat. Additional concerns were raised on the legacy of the line that will supply power to the mine site and the ability (or lack of) for the community of Wells and others to benefit from, and use, the three-phased power at the end of the mine life.
Noise, Light, and Visual Effects	Potential for the project to cause noise and light pollution as well as affect visual quality in the community of Wells. Concerns that these effects may impact the quality of life for residents in the community of Wells and effects may be amplified due to the topography of the region (i.e. Wells being in a valley). Additional concerns were raised regarding data collection for baseline studies on noise and light at the proposed mine site.
Second Portal at Island Mountain	Potential effects on dust, noise and traffic in the area from the second portal at Island Mountain. Concerns focused on the location and proximity of this portal to the community of Wells, increased mine traffic, the safety of residential traffic, and the portal’s temporary nature.
Worker Accommodation and Housing	Potential effect of Cariboo Gold on the current housing shortages in the region, property values, and the ability for other businesses to recruit people to the area. Concerns with the loss of motels in the

	<p>community of Wells that are now used to house mine workers which reduces the availability of accommodations for tourists during peak seasons and festivals that occur within the Wells region.</p> <p>Potential effects from the number of transient workers living in work camps located in the community of Wells on the community culture/atmosphere and municipal infrastructure (e.g. water supply, sewage).</p>
Air Quality and Dust	<p>Potential effects to air quality due to impacts from dust, vehicle emissions, vent raises, and emissions from facilities. Concerns that the community of Wells is downwind from the project site and is situated in a valley which may amplify effects to air quality.</p>
Socio-Economic	<p>Concerns were raised about ensuring the various sectors that support the Wells economy can coexist. These concerns focused on the need to balance the tourism, outdoor recreation, mining, and arts and culture sectors in Wells and avoid the mining industry from negatively impacting the others.</p> <p>Comments were raised about finding potential collaborative or cooperative opportunities between the various sectors of the community with this project that could be mutually beneficial.</p> <p>Comments discussed the need to ensure lasting benefits to the community through legacy investments into infrastructure or programs.</p>
Water Treatment and Water Quality	<p>Potential effects to surface water, groundwater, and aquifers and the potential for the presence of potentially acid generating material.</p> <p>Concerns with the proximity of mine infrastructure to various waterways including Jack of Clubs lake, Willow River, and Quesnel River and the ability for Cariboo Gold to capture and treat runoff and handle large precipitation events at the various project sites.</p> <p>Concerns with the potential re-disturbance of historic mine waste and contamination in the Jack of Clubs lake and how this would be treated as well as the treatment of water released through the dewatering of existing and new adits.</p>

5.0 TECHNICAL ADVISORS

Technical advisors play a vital role in advising the EAO and participating Indigenous nations on technical matters related to the assessment. Technical advisors will have the opportunity to participate on the Technical Advisory Committee formed during Process Planning, should Cariboo Gold proceed to an EA. Please see the [Technical Advisory Committee Guidelines](#) for more information.

The EAO contacted technical advisors from participating Indigenous nations (see Table 3), local governments (City of Quesnel, District of Wells, and Cariboo Regional District), and provincial and federal government agencies (Ministry of Energy, Mines & Petroleum Resources, Ministry of Environment & Climate Change Strategy, Climate Action Secretariat, Ministry of Indigenous Relations and Reconciliation, Ministry of Forests, Lands, Natural Resource Operations & Rural Development, Ministry of Transportation and Infrastructure, Interior Health Authority, Northern Health Authority, and Impact Assessment Agency of Canada) to request their feedback on the Initial Project Description and supplemental information.

On June 11, 2020, the EAO hosted a meeting with technical advisors to provide an overview of Cariboo Gold and the new EA process under the Act and to outline the roles and responsibilities of technical advisors during Early Engagement and of the Technical Advisory Committee formed in the Process Planning phase, should Cariboo Gold proceed to an EA. Following the meeting, the EAO requested that technical advisors identify key issues for BGM to consider in the Detailed Project Description. On July 22, 2020, the EAO held a second meeting with technical advisors to discuss any preliminary thoughts, areas of concerns, and clarification questions prior to submitting comments. The first half of the July 22, 2020 meeting included just the EAO and technical advisors, BGM then joined for the second half of the meeting.

A complete list of comments received from technical advisors on the Initial Project Description and supplemental information can be found on the EAO's [EPIC website](#) and a summary of input received from technical advisors during Early

Engagement is provided in Table 2 below. BGM is required to consider feedback from technical advisors and indicate how it is incorporated into the Detailed Project Description via the inclusion of additional information, project design considerations and/or indicate how these comments may inform subsequent phases of the EA.

Table 2. Summary of Technical Advisor Comments during Early Engagement

Category	Technical Advisor Input
<p>Project design considerations for the Cariboo Gold mine site, Quesnel River (QR) mill, and Bonanza Ledge Mine site.</p>	<p>Clarification is needed on overburden stockpiles, sedimentation ponds, discharge points into the receiving waters, the potential volume of tailings to be produced and stored in the tailings storage facility (TSF), TSF design, progressive reclamation, and how historical underground workings are being considered and incorporated into the mine design.</p>
	<p>The Detailed Project Description will need to include discussion of best practices and Best Available Technologies for waste management, including water treatment.</p>
	<p>There will need to be an emphasis on best management and monitoring practices for tailings storage and water management, and a consideration of flood and freshet events in emergency response planning. Additionally, BGM is requested to include a tailings alternative assessment as part of their Detailed Project Description.</p>
	<p>The waste rock storage facility designs will need to describe the foundation conditions of all proposed waste rock storage facilities, including where founded on historic mine rock and specify the type of liner (if any) proposed to be used.</p>
	<p>Climate change effects need to be considered and incorporated in the analysis of required water use and resources for the project, water management measures related to larger precipitation events and extended periods of drought, and mine decommissioning and reclamation activities.</p>
<p>Project interactions with the biophysical environment</p>	<p>Further conceptual information will need to be included in the Detailed Project Description of the various water treatment concepts/approaches that BGM is considering for Cariboo Gold and how precipitate from the water treatment plan will be managed during operation and closure.</p>
	<p>Consideration is needed regarding road dust and fugitive dust mitigation and its effects on air quality and country foods, as well as a consideration of how pre-existing management plans or technologies eliminate, control, or mitigate the effects of windblown dust associated with the various tailings handling options.</p>
	<p>Clarification is needed on how the various tailings storage options influence the volume requirements of overburden and soil materials to meet end land use and closure objectives.</p>
	<p>Concerns regarding project activities that have the potential to effect bats and/or bat habitat.</p>
	<p>Concerns were raised related to building on a previously used industrial site and the potential for additional environmental hazards and compounding of potential biophysical risks.</p>
	<p>Concerns were noted about how project use of existing facilities/operations should best be considered in evaluating effects on wildlife and habitat resources.</p>
	<p>Concerns were noted related to the effects of Cariboo Gold (including the mine site, Bonanza Ledge Mine site, and Northern Transmission Line route) on caribou and caribou habitat, specifically on the Barkerville herd.</p>
	<p>Concerns were noted about project effects to habitat areas managed by Land Use Orders (e.g. grizzly bear habitat, Old-Growth Management Areas, moose habitat) as well as proposed whitebark pine critical habitat, and area managed as Mule Deer Winter Range.</p>

Project interactions with the human environment	Request were made for further information on worker accommodations including the intended capacity of QR mill camp and the proposed drinking water systems. Due to the proximity of the mine site camp to Wells, concerns were raised about the measures that will be taken around managing worker conduct and interactions within Wells.
	A Human Health Risk Assessment approach should be used to assess health effects associated with biophysical exposures, in accordance with Health Canada’s guidance, conducted by a professional with expertise and experience conducting human health risk assessments.
	Reviewers emphasized the need to consider the current medical infrastructure of nearby communities (Wells, Quesnel) and identify any potential burdens on the local medical infrastructure and describe how it would be prevented or mitigated.
Permitting considerations	There may be several permits/approvals/certificates required that are not currently reflected in the Initial Project Description, including an effluent discharge permit, an emissions discharge permit, and a refuse permit. In addition, several regulations may apply, e.g. Municipal Waste Regulation, Hazardous Waste Regulation, etc.
	Requests were made seeking clarification on the expected timeline for completion of the transmission line and how that relates to the timeframe required for decisions on Statutory Right of Way applications.
	A flag was raised that the proposed activities associated with Cariboo Gold are anticipated to require <i>Mines Act</i> permit amendments for the Bonanza Ledge site, QR Mill site, and Mosquito Creek Site.
	Reviewers were seeking clarification on the effects of Cariboo Gold on legislated greenhouse gas targets as described in the <i>Climate Change Accountability Act</i> . A request was made that BGM determine the likely greenhouse gas emissions from base case of the project for all sources covered by the <i>Greenhouse Gas Industrial Reporting and Control Act</i> .
Baseline Information	A request was made for BGM to discuss baseline study details with appropriate agencies early in the process to ensure the data collected is sufficient.
	Concerns were raised related to air quality given the proximity to Wells and the studies to represent baseline conditions.
Archaeology/Heritage	A request was made for a short summary of past archaeological/heritage work completed by BGM and seeking a commitment to future assessments once development plans are finalized.
	A recommendation was made to contact the Ministry of Forests, Lands, Natural Resource Operations and Rural Development’s Heritage Branch for their input, considering the large number of Mining Era Heritage sites that could be impacted.

6.0 PARTICIPATING INDIGENOUS NATIONS

On May 14, 2020, the EAO notified Indigenous nations regarding the approval of the Initial Project Description and Engagement Plan and the start of the Early Engagement phase. The Indigenous nations were selected for notification based on the EAO’s understanding at the onset of Early Engagement of known traditional territories that overlap with the Cariboo Gold area, asserted rights in the Cariboo Gold area, past and current use of the Cariboo Gold area, as well as consultation obligations. Based on this information, the EAO provided Lhtako Dené Nation, Soda Creek Indian Band (alternatively known as Xat’súll First Nation), and Williams Lake First Nation with information regarding self-identification as a participating Indigenous nation under Section 14(1) of the Act. Additionally, the EAO proposed to notify the following Indigenous nations of milestones for Cariboo Gold: Nazko Indian Band, Neskonlith Indian Band, and Tsilhqot’in National Government. Nazko Indian Band, Neskonlith Indian Band, and Tsilhqot’in National Government were invited to participate during the Early Engagement phase through the public comment and engagement period and were invited to provide the

EAO with more information about their interests in the Cariboo Gold area should they disagree with the EAO's assessment and understanding of their interests in the area.

Subsequent to this initial correspondence, Lhtako Dené Nation, Soda Creek Indian Band, and Williams Lake First Nation provided the EAO with notices of self identification as participating Indigenous nations. Notices from each self-identified participating Indigenous nation are posted publicly on the EAO's [EPIC website](#).

Table 3 below provides the list of participating Indigenous nations for Cariboo Gold.

Table 3. List of participating Indigenous nations

Indigenous nation	Mailing address
Lhtako Dené Nation	1515 Arbutus Road PO Box 4069 Quesnel, BC V2J 3J9
Soda Creek Indian Band (alternatively known as Xat'sūll First Nation)	3405 Mountain House Road Williams Lake, BC V2G 5L5
Williams Lake First Nation	2672 Indian Drive Williams Lake, BC V2G 5K9

Participating Indigenous nations are afforded specific procedural rights within the Act, including access to capacity funding, consensus seeking processes, a procedure to communicate consent or withhold consent at specific decision points, and access to facilitated dispute resolution. For more information on participating Indigenous nations please see the [EAO's guidance materials](#).

The EA process is designed to advance reconciliation with Indigenous peoples by implementing the standards set out in the *United Nations Declaration on the Rights of Indigenous Peoples* in the context of EA. For every EA, the effects of a project on Indigenous nations and their Aboriginal rights under Section 35 of the *Constitution Act, 1982* must be assessed. However, the EAO recognizes that each Nation has a unique culture and connection to the lands and resources that are subject to a proposed project, including situating the project proposal within the Nation's priorities and visions into the future.

One objective of Early Engagement is to seek a preliminary set of interests from each Nation to inform a more complete understanding of interests. It is critical that proponents and the EAO engage with each Nation to better understand how these preliminary interests may be related to potential effects specific to the project on each Nation's rights or the Nation itself. This understanding of potential effects pathways between the project and a Nations' interests will inform a refined scope of engagement with each Nation throughout the EA, assuming the project proceeds beyond the Readiness Decision. This customized scope of engagement will be unique for each Nation through the recognition of:

- Past, current, and future use of the project area and/or resources that may utilize or located within the project area (including potential downstream effects);
- Refined project-specific interests and potential effects to the Nations and/or their rights; and
- The governance role of each Nation in the project area.

Importantly, the EAO recognizes that the interests identified by each Nation at this stage of the Early Engagement phase for Cariboo Gold require additional engagement by BGM and the EAO to inform the scope of subsequent engagement. The EAO will also continue to engage with each Nation to better understand each Nation's interests with respect to Cariboo Gold.

BGM is required to consider the interests provided by each Indigenous nation and indicate how these interests are incorporated into the Detailed Project Description, for example through the inclusion of additional information, project

design considerations, and/or an indication how comments may be considered in subsequent phases of the EA. The EAO also anticipates BGM may undertake additional engagement with Indigenous nations to better understand the interests and Project concerns put forth, and that BGM will respond to each Nation’s interests as part of the Detailed Project Description by considering if additional information is necessary to inform the Readiness Decision. The EAO will support these discussions by defining the level and type of information required at the Readiness Decision. The EAO will review the Detailed Project Description and BGM’s response to the input received from each participating Indigenous nation collaboratively with the Nations in support of the Readiness Decision.

The EAO anticipates that the scope of engagement will be different for each Nation in recognition of the diverse interests inherent to Indigenous nations. The scope of engagement with each participating Indigenous nation will be finalized during the Process Planning phase through issuance of a Process Order that includes specific information necessary to assess effects of Cariboo Gold on a Nation and/or its rights, the level of involvement of each Nation on the Technical Advisory Committee and its sub-committees, the timing and nature of specific engagement activities, and whether a Nation(s) wish to conduct certain aspects of the assessment.

Table 4 below summarizes Indigenous interests and concerns that have been identified by participating Indigenous nations at this time.

Table 4. Summary of interests and concerns identified by participating Indigenous nations in Early Engagement

Indigenous Nation	Potential effects to Indigenous Interests and Project Concerns
Lhtako Dené Nation	Concerns with the social, cultural, and environmental effects of the proposed Northern Transmission Line route and its potential to cause a loss of resource use areas, disturbance and loss of wildlife and wildlife habitat, particularly caribou habitat, and disturbance to valuable aquatic and terrestrial ecosystems.
	Concerns with the disturbance to berry harvesting sites along the proposed transportation routes, particularly the 500 Nyland Lake Road, through physical loss of the resource use area, restricted access to the resource area, and dust emissions rendering traditionally harvested berries inedible.
	Concerns with tailings management including the desire for more information on dry tailings storage and the potential effects to water quality and aquatic resources in Quesnel River.
	Concerns with the effects to resource use areas through the reduced access and/or loss of fishing, hunting, trapping, gathering and harvesting sites/areas.
	Interest in conducting further archaeological monitoring to address concerns with loss or infringement of archaeological sites/areas from land alerting activities.
	Concerns with the potential disturbance of spiritual sites and culturally sensitive areas.
	Concern with the loss of both water and land transportation routes that overlap with the Cariboo Gold footprint.
	Concerns regarding effects to water quality and fish and fish habitat from water impairment, seepage of contamination into surface water and groundwater downstream of project area, changes to stream hydrology, effects to potable water supply, and loss of riparian ecosystems and wetlands.
	Concerns with the effects to terrestrial and aquatic animal species through the disturbance or loss of critical habitat and wildlife corridors from land clearing, disturbance or loss of salmon from water impairment, and terrestrial wildlife mortality from increased traffic.
	Concerns with the effects to plants from the loss of rare and culturally species and the loss of commonly harvested species.
	Concerns with the potential for impairment to air quality from pollution (i.e. contaminants and greenhouse gas emissions) and increased dust emissions.
	Concerns with the effects of noise pollution through increased noise levels from construction and operations.
	Concerns about water quality from discharge at QR Mill, including previous non-compliances and reporting at this site.
	Concerns with the loss of natural resources for future generations.
Interest in ensuring the appropriate use of Traditional Ecological Knowledge and Traditional Land Use and Occupancy Study information in all phases of the EA.	
Interests in woodland caribou, including impacts of Cariboo Gold on the local Barkerville caribou herd and cumulative impacts in the region from forestry and other industry, as well as the interactions with moose	

	and moose hunting. Recovery of the caribou herd is a priority and Lhtako has future aspirations to be able to hunt caribou again in the future.
	Interests in future aspirations for use of the land – Lhtako is attempting to revitalize the community and focus on fishing, ethnobotany and medicinal plant gathering in the area.
	Interests in becoming partners with local governments and industry in managing the land base and providing Lhtako Dené Nation members with employment opportunities.
Soda Creek Indian Band	Interests in being involved in any archaeological studies being done in the project area, including being involved in study design, preliminary field reconnaissance studies, and any archaeological finds.
	Interest in completing a traditional use study in the area of the project and the local region.
	Concerns about any modifications to the access roads, including widening or lengthening the roads.
	Interest in being involved in any land stewardship initiatives.
	Interested in developing experience and training for water technicians within Soda Creek Indian Band through working on this project.
	Concerns about emergency procedures during shutdowns, in particular in the community due to recent Mt Polley disaster nearby.
	Interests in understanding closure and reclamation plans prior to project operating.
	Concerns about cumulative impacts in the region due to other industry activity including placer mining.
	Interests in understanding impacts to water quality from the project.
Williams Lake First Nation	Interested in developing traditional use studies in the area of the QR Mill and access roads to the QR Mill.
	Interests regarding understanding effects to water quality downstream of the QR Mill, including what are existing conditions on site, storage of potentially-acid generating rock material stored at QR Mill site.
	Concerns regarding road use and cumulative effects of traffic on access roads to QR Mill.
	Interests in being involved in archaeological studies in the area of the QR Mill and potential effects to cultural heritage.
	Interests in effects to wildlife and wildlife habitat.
	Interests in effects to vegetation.
	Effects to fish and fish habitat downstream of the QR Mill, in particular on salmon populations.

7.0 CONCLUSION AND NEXT STEPS

As a next step in the Early Engagement phase, BGM is required to provide meaningful responses to the input included in this Summary of Engagement and consider the individual issues raised during Early Engagement in the development of the Detailed Project Description for Cariboo Gold. The guidelines for completing a Detailed Project Description are included in the [Early Engagement Policy](#). The EAO recommends that, prior to formally submitting the final Detailed Project Description to the EAO, BGM provide an early draft of the Detailed Project Description to the EAO, technical advisors and participating Indigenous nations to seek their feedback and identify if additional information is needed in the Detailed Project Description that may be helpful in support of the Readiness Decision, which seeks to:

- Ensure sufficient proponent engagement with participating Indigenous nations, provincial and federal agencies, local governments, and the public has occurred, including adequate opportunities to comment on project design, siting, and alternative approaches to developing the project;
- Ensure sufficient information is available to initiate an EA, including that which is required for the Process Planning phase which sets the scope and information requirements for the project's EA; and
- Transparently identify key project issues for resolution during the EA.

It is important that the Detailed Project Description describe how engagement was considered and how it may have contributed to changes in the proposed project design or to subsequent EA phases.

As part of the Detailed Project Description submission, BGM is required to respond to:

- Each public comment category, in Table 1 (with consideration of individual comments for context);
- Each comment from technical advisors, found on the EAO's [EPIC website](#); and

- Each of the interests provided by each Indigenous nation, in Table 4.

BGM should respond to this input via the inclusion of additional information, indicating any changes in project design considerations (including project siting, design, or alternative options) and/or indicating how these comments may inform subsequent phases of the EA. The EAO requests that the submission of the Detailed Project Description be accompanied by a table that clearly references how feedback received by EA participants (in addition to what is summarized in this report) is incorporated into the Detailed Project Description, as warranted. The EAO also encourages that BGM engage with the participating Indigenous nations and technical advisors that provided comments during development of the Detailed Project Description to collaboratively discuss additional information that may be helpful to inform the Readiness Decision to determine if there is adequate information to proceed to an EA.

If the project proceeds to an EA, the Detailed Project Description will be used as BGM's key foundational document to inform the development of documents during the Process Planning phase, particularly the Process Order, the Assessment Plan, the Application Information Requirements, and the Regulatory Coordination Plan.