GALORE CREEK PROJECT
KEY POINTS FOR LETTER TO OFFICIALS

• Request:
  o We request that the Galore Creek Project undergo a revised Environmental Impact Study

• Reasons for request:
  o The current EIS is old
    ▪ The current study was finalized in 2007 and is based on field data as old as the year 2000
  o There are new regulations
    ▪ In the time since the 2007 analysis both Canadian federal and British Columbian provincial regulations and guidance have been revised
    ▪ There is currently a new federal Impact Assessment Act under review in the Canadian Parliament:
      • The Impact Assessment Act will create a single Impact Assessment Agency to conduct and decide on environmental assessments on behalf of the Federal Government
      • This Act includes an analysis of a wider range of effects in the final approval process than was conducted in 2007 (including impacts to health, society, gender, climate change, Aboriginal peoples, jobs and the economy)
  ▪ Indigenous Rights:
    • In 2014 the Supreme Court of Canada in Tsilhqot’in Nation v. British Columbia upheld Aboriginal title over their lands - actions approved prior to this decision must now be revisited in light of this decision
    • In 2016, the United Nations Declaration on the Rights of Indigenous Peoples (the Declaration) was ratified by Canada
    • The Declaration requires Canada and its provinces apply Free, Prior and Informed Consent for projects affecting all First Nations
  ▪ Response to Mt. Polley Disaster:
    • At the Provincial level, in response to the Mt Polley failure in 2104, British Columbia updated both the Mines Act and the Health, Safety, and Reclamation Code for mines
    • The new codes require mines to develop and maintain a tailings storage management system that includes regular audits and to retain an engineer of record on-site
    • The updated Act also includes provisions for minimizing the health, safety, and environmental risks related to mining activities
  ▪ Climate Change:
    • Over the past 12 years, climate change has modified the landscape, precipitation amounts, and water regimes
    • The seasonality analysis and water balance cited in the analysis are now outdated
    • Successful long-term closure and maintenance of the site requires accurate information in order to maintain the water cover over the tailings and prevent uncontrolled releases