



Lawyers-Ranch Project

Responses to Summary of Issues from the
Impact Assessment Agency of Canada

May 28, 2026

Revision Record

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List of Acronyms and Abbreviations

Acronym/Abbreviation	Definition
BC	British Columbia
DFO	Department of Fisheries and Oceans
EA	Environmental Assessment
EAA	<i>Environmental Assessment Act</i>
EAO	Environmental Assessment Office
ECCC	Environment and Climate Change Canada
IAA	<i>Impact Assessment Act</i>
IAAC	Impact Assessment Agency of Canada
IPD	Initial Project Description
JSOIE	Joint Summary of Issues and Engagement
km	kilometre
Section 35 Rights	Rights under Section 35 of the <i>Constitution Act, 1982</i>
the Project	Lawyers-Ranch Project
Thesis	Thesis Gold and Silver Inc.
VC	Valued Component

1.0 Introduction

Thesis Gold and Silver Inc. (Thesis) is proposing to construct and operate a gold-silver mining project in the Toadoggone mining region of British Columbia (BC), named the Lawyers-Ranch Project (the Project). The Project is located approximately 450 kilometres (km) north-northwest of the City of Prince George and 275 km north of the Town of Smithers, and is situated on Crown land in BC, administered by the Province of British Columbia.

On December 17, 2025, Thesis submitted an Initial Project Description (IPD) to the BC Environmental Assessment Office (EAO) representing the Project's formal entry into the Early Engagement phase of the BC EAO process. Formal entry into the Planning phase of the Impact Assessment Agency of Canada (IAAC) process occurred once the IPD was accepted and posted to the Canadian Impact Assessment Registry on December 19, 2025. On May 8, 2026, the IAAC and the EAO published their Joint Summary of Issues and Engagement (JSOIE) in response to the comments received during the IPD comment period. Thesis has prepared this document in response to the Key Issues Within Federal Jurisdiction included in the JSOIE. This documented response fulfills Thesis' duty, as Proponent, by identifying the intended pathways to address the issues referred to in Sections 14 and 15 of the *Impact Assessment Act* (IAA), including issues that relate to the potential effects that the Project may have on the rights of the Indigenous Peoples of Canada.

This response outlines how Thesis intends to address the key federal issues identified in the JSOIE through existing provincial and federal regulatory mechanisms. Responses in this document focus on the issues within federal jurisdiction only; the provincial issues are being addressed through provincial processes, including the provincial Environmental Assessment (EA), and are not included in this document. Responses will highlight how issues within federal jurisdiction are anticipated to be addressed through the other processes that the Project is subject to, including the provincial EA.

The EAO has submitted a request for substitution to the IAAC President, and we anticipate a decision to be made by the federal Minister of Environment and Climate Change during the Process Planning Phase of the provincial EA process. A decision on substitution will follow the IAAC's Section 16 decision on whether an Impact Assessment is required. If substitution is approved, the Project would be subject to the Section 33 conditions of the IAA. Thesis understands federal consultation and approvals will be required regardless of the outcome of the request for substitution.

Since submission of the IPD on December 17, 2025, Thesis has continued to engage with Indigenous groups. Section 2.3 provides an update related to those efforts.

2.0 Key Issues Within Federal Jurisdiction and Responses

2.1 Fish and Fish Habitat

Concerns were raised about the project having the potential to result in adverse effects to fish and fish habitat, including from vegetation removal, deposition of tailings in water and changes in flow in the Findlay River, Metsantan Creek, and Moyez Creek watersheds. Transportation infrastructure for the mine could also result in impacts to the Findlay and Stikine River watersheds.

- Provide details on the extent of fish habitat in the project area, waters frequented by fish, and whether a Schedule 2 Amendment would be required under the *Metal and Diamond Mining Effluent Regulations* for the construction and operation of the Tailings Management Facility in any waters frequented by fish.
- Provide details on the potential impacts to fish and fish habitat, including potential changes as a result of accidents and malfunctions, and measures that could be implemented to mitigate any potential impacts.
- Consider alternative means of carrying out the Project, including options for relocating and redesigning Project components, such as the Tailings Storage Facility, to address concerns raised by technical advisors and Indigenous groups.

Project design and engineering is ongoing and will consider if water treatment will be required. The ongoing water quality modelling will inform the understanding of appropriate level of treatment that may be needed for the Project.

The provincial EA process requires that Thesis complete an EA Application that follows the general application requirements outlined in the EAO Application Information Requirements Template (EAO 2026), as well as the Application Information Requirements Mining Sector Supplement (EAO 2025). The EA Application will be developed with consideration of the provincial Effects Assessment Policy (EAO 2020b). The EA Application for the Project is anticipated to include an assessment of potential Project effects on surface water (quality and quantity) that will feed into the assessment of fish and fish habitat. Should effects be predicted in the EA Application, mitigation measures will be proposed to avoid, reduce, or otherwise address potential negative effects and enhance positive effects, as applicable. Identification of indicators to assess potential effects on fish and fish habitat and surface water are anticipated to be proposed via the Application Information Requirements process, during the provincial Process Planning phase for input.

Water modelling, and Project design and engineering to determine the potential interactions of the Project with groundwater and surface water, are underway. The results of the preliminary modelling will be used to refine Project engineering designs and correspondingly mitigate potential environmental effects of the Project. The groundwater and surface water models are anticipated to be updated to support the effects assessment in the EA Application.

The Project will be assessed in accordance with provincial and federal requirements, as applicable. Table 3 of the BC EAO Application Information Requirements Template (EAO 2026) provides an overview of typically considered relevant statutes, policies, and frameworks within the provincial EA Application, including the *Fisheries Act* and regulations and Department of Fisheries and Oceans (DFO) frameworks and policies.

Table 2-1 summarizes how the key issue related to fish and fish habitat will also be addressed by existing legislative and regulatory frameworks (i.e., provincial or federal legislation or regulations), through the application of standard mitigation measures, including those identified by IAAC, or through Thesis' commitments to best practices, policies, or standards, or a combination of these methods.

Table 2-1: Relevant Federal, Provincial, and Mitigation Pathways for Fish and Fish Habitat

Key Issue	Relevant Federal Permitting or Authorizations	Relevant Provincial Permitting or Authorizations	Initial Mitigation Measures
<p>Concerns were raised about the project having the potential to result in adverse effects to fish and fish habitat, including from vegetation removal, deposition of tailings in water, and changes in flow in the Findlay River, Metsantan Creek, and Moyez Creek watersheds. Transportation infrastructure for the mine could also result in impacts to the Findlay and Stikine River watersheds.</p>	<ul style="list-style-type: none"> • <i>Fisheries Act</i> Authorization under Paragraphs 34.4(2)(b) and 35(2)(b) (Government of Canada 1985) <ul style="list-style-type: none"> ○ Responsible agency: Fisheries and Oceans Canada (DFO). • <i>Species at Risk Act</i> Permit (Government of Canada 2002) <ul style="list-style-type: none"> ○ Responsible agencies: ECCC and DFO. • Metal and Diamond Mining Effluent Regulations, Schedule 2 under the <i>Fisheries Act</i> <ul style="list-style-type: none"> ○ Responsible agency: ECCC. 	<ul style="list-style-type: none"> • In British Columbia (BC), the Environmental Assessment (EA) process occurs prior to the permitting process. • <i>Wildlife Act</i> Permits (BC Gov 1996b). <ul style="list-style-type: none"> ○ Responsible agency: Ministry of Environment and Parks. 	<p>Potential effects and the proposed measures to avoid, mitigate, or accommodate them, will be informed by input provided by potentially impacted Indigenous nations through the EA process.</p> <ul style="list-style-type: none"> • The following provincial standard frameworks will be considered in the planning of the Project: <ul style="list-style-type: none"> ○ Application Information Requirements Guidelines (EAO 2026); ○ Application Information Requirements Mining Sector Supplement (EAO 2025); and ○ Effects Assessment Policy (EAO 2020b). • The mitigation hierarchy of avoid, minimize, restore onsite and offset (EAO 2026) is anticipated to be applied to the Fish and Fish Habitat and Surface Water Valued Components. • The following federal fish and fish habitat mitigation measures are aligned with the standard mitigation frameworks (IAAC 2026), and will be considered in the planning of the Lawyers-Ranch Project: <ul style="list-style-type: none"> ○ Design for closure to minimize potential for mine contact water. ○ Maximize recycling of contact water for process water to reduce supplementation from non-contact sources. ○ Manage potentially acid generating materials. ○ Avoid aquatic habitat loss through selection of project component locations that do not interact with fish-bearing waterbodies. ○ Consider developing a trigger action response plan for treatment and discharge. <p>Additional, site-specific mitigation measures will be considered during the EA process. The potential effects of the Project will be assessed with consideration of the provincial Effects Assessment Policy (EAO 2020b), including the consideration of avoidance, reduction, restoration, and offsetting measures. Site-specific measures will be determined after the determination of potential effects and will first consider avoidance through Project design. Thesis will continue discussions with Indigenous Groups and regulatory authorities as design advances. Some site-specific mitigations that may be considered during the EA process are:</p> <ul style="list-style-type: none"> • Manage discharge location to reduce potential effects to Fish and Fish Habitat.
<p>Provide details on the extent of fish habitat in the project area, waters frequented by fish, and whether a Schedule 2 Amendment would be required under the <i>Metal and Diamond Mining Effluent Regulations</i> for the construction and operation of the Tailings Management Facility in any waters frequented by fish.</p>		<ul style="list-style-type: none"> • Data collection programs are ongoing and supporting technical studies/reports are anticipated to be appended to the EA Application. • The Lawyers-Ranch Project (the Project) will be assessed in accordance with provincial and federal requirements, including the Metal and Diamond Mining Effluent Regulation, if required. 	
<p>Provide details on the potential impacts to fish and fish habitat, including potential changes as a result of accidents and malfunctions, and measures that could be implemented to mitigate any potential impacts.</p>		<p>The Project will be assessed in accordance with provincial and federal requirements, as applicable.</p> <p>The BC Environmental Assessment Office Application Information Requirements Template (EAO 2026) outlines the requirements of an assessment of Malfunctions and Accidents that are anticipated to be included in the EA Application for the Project.</p>	
<p>Consider alternative means of carrying out the project, including options for relocating and redesigning project components such as the Tailings Storage Facility, to address concerns raised by technical advisors and Indigenous groups.</p>	<p>It is anticipated that there will be future opportunities for federal agencies and Indigenous groups to provide input on the scope of the EA through the Tailored Impact Statement and review through the Technical Advisory Committee.</p> <p>Thesis plans to engage with relevant regulatory authorities during the Process Planning phase to align on the scope and approach for meeting the requirements of the Application Information Requirements.</p>	<p>The Project will be assessed in accordance with provincial and federal requirements, as applicable. The BC Environmental Assessment Office Application Information Requirements Template (EAO 2026) outlines the requirements of considering alternatives to and alternatives means to carry out the Project.</p>	

2.2 Migratory Birds and Species at Risk

The construction, operation, and decommissioning of the project could impact migratory birds, including:

- Those listed on Migratory Birds Regulations Schedule 1; and
- Many of which are also listed on Schedule 1 of the *Species at Risk Act*. (For those migratory birds that are also species at risk, the conventions under the *Species at Risk Act* apply on all lands, not just federal lands).

The project components and activities may result in individual mortality and the destruction of their habitat, nests, and eggs. Well-understood mitigation measures, including the standard mitigation measures identified by IAAC and the Guidelines to Avoid Harm to Migratory Birds, would typically manage potential adverse effects to migratory birds.

Provide additional information on any potential effects to migratory birds that are anticipated from the project that would not be managed by standard mitigation measures, and the potential measures to avoid, reduce, and/or offset these effects.

The provincial EA process requires that Thesis submit an EA Application, with general application requirements outlined in the EAO Application Information Requirements Template (EAO 2026), and the Application Information Requirements Mining Sector Supplement (EAO 2025). The EA Application will be developed with consideration of the provincial Effects Assessment Policy (EAO 2020b). The EA Application is anticipated to include an assessment of potential Project effects on Wildlife as a Valued Component, which includes migratory birds and species at risk. Should affects to Wildlife be predicted in the EA Application, mitigation measures will be proposed to avoid, reduce, or otherwise address potential negative effects and enhance positive effects, as applicable. Species of migratory birds are anticipated to be proposed via the Application Information Requirements process for input.

Table 2-2 summarizes how the key issue related to migratory birds and species at risk will be addressed by existing legislative and regulatory frameworks (i.e., provincial or federal legislation or regulations), through the application of standard mitigation measures, including those identified by IAAC, or through Thesis' commitments to best practices, policies or standards, or a combination of these methods.

Table 2-2: Relevant Federal, Provincial, and Mitigation Pathways for Migratory Birds and Species at Risk

Key Issue	Relevant Federal Permitting or Authorizations	Relevant Provincial Permitting or Authorizations	Initial Mitigation Measures
<p>The construction, operation, and decommissioning of the project could impact migratory birds, including:</p> <ul style="list-style-type: none"> • Those listed on <i>Migratory Birds Regulations</i> Schedule 1; and • Many of which are also listed on Schedule 1 of the <i>Species at Risk Act</i>. (For those migratory birds that are also species at risk, the conventions under the <i>Species at Risk Act</i> apply on all lands, not just federal lands). 	<ul style="list-style-type: none"> • <i>Migratory Birds Convention Act</i>, 1994 Authorization (Government of Canada 1994) <ul style="list-style-type: none"> ○ Responsible agency: Environment and Climate Change Canada (ECCC). • <i>Species at Risk Act</i> Permit (Government of Canada 2002) <ul style="list-style-type: none"> ○ Responsible agencies: ECCC and Fisheries and Oceans Canada. 	<ul style="list-style-type: none"> • In British Columbia, the Environmental Assessment (EA) process occurs prior to the permitting process. • Birds are a planned subcomponent of the Wildlife Valued Component (VC) for inclusion in the EA Application. Based on the interactions between the Lawyers-Ranch Project (the Project) activities and components, and the VCs, the potential effects of the Project will be identified and assessed in the EA Application. 	<p>Potential effects and the proposed measures to avoid, mitigate, or accommodate them, will be informed by input provided by potentially impacted Indigenous nations through the EA process.</p> <ul style="list-style-type: none"> • The following provincial standard frameworks will be considered in the planning of the Project: <ul style="list-style-type: none"> ○ Application Information Requirements Guidelines (EAO 2026); ○ Application Information Requirements Mining Sector Supplement (EAO 2025); and ○ Effects Assessment Policy (EAO 2020b).
<p>The Project components and activities may result in individual mortality and the destruction of their habitat, nests and eggs. Well-understood mitigation measures, including the standard mitigation measures identified by Impact Assessment Agency of Canada and the Guidelines to Avoid Harm to Migratory Birds, would typically manage potential adverse effects to migratory birds.</p>		<ul style="list-style-type: none"> • Engagement regarding the species selected for assessment will continue, and input from Indigenous groups and federal agencies will be considered through the Technical Advisory Committee and process planning. • Data collection programs are ongoing and supporting technical studies/reports are anticipated to be appended to the EA Application. 	<ul style="list-style-type: none"> • The bird species (e.g., a species at risk) or groups of species will be identified and are anticipated to be used for effects. These indicator species will serve as the focus of the effects assessment, which is anticipated to consider the different species and groups of species may be affected by the Project and may require different mitigation measures (Government of Canada 2025).
<p>Provide additional information on any potential effects to migratory birds that are anticipated from the project that would not be managed by standard mitigation measures, and the potential measures to avoid, reduce, and/or offset these effects.</p>		<ul style="list-style-type: none"> • <i>Wildlife Act</i> Permits (BC Gov 1996b) <ul style="list-style-type: none"> ○ Responsible agency: Ministry of Environment and Parks. 	<ul style="list-style-type: none"> • The following federal migratory bird and species at risk mitigation measures are aligned with the standard mitigation frameworks (IAAC 2026), and will be considered in the planning of the Project: <ul style="list-style-type: none"> ○ Conduct pre-clearing surveys prior to ground disturbance. ○ Implement buffers around migratory bird habitat features. ○ Conduct vegetation clearing outside of sensitive wildlife periods, including during the migratory bird nesting season. • Site-specific mitigation measures will be determined during the EA process. The potential effects of the Project will be assessed with consideration of the provincial Effects Assessment Policy (EAO 2020b), including the consideration of avoidance, reduction, restoration, and offsetting measures. Site-specific measures will be determined after the determination of potential effects and will first consider avoidance through Project design. Thesis will continue discussions with Indigenous Groups and regulatory authorities as design advances.

2.3 Indigenous Engagement and Consultation

Concerns relate to whether the assessment process is sufficiently inclusive, fair, and credible from an Indigenous rights perspective. Some Indigenous nations have indicated they were not engaged early or meaningfully by the Proponent, raising concerns about unequal participation and missed opportunities to influence Project design and decision-making.

- Clarify the process to support meaningful engagement and consultation with Indigenous groups that builds trust and recognizes Indigenous rights and cultural relationships to the land.

Thesis acknowledges that the Project is at the early/initial stages of the EA process. Thesis is committed to engaging with potentially impacted Indigenous nations to understand how the Project may affect the meaningful exercise of their Rights under Section 35 of the *Constitution Act*, 1982 (Section 35 Rights).

Thesis began engagement with the Indigenous nations that were understood at the time to have rights and interests within the vicinity of the Project as early as 2018. This understanding was informed by the BC Consultation Areas Spatial Tool, preliminary ethnohistorical work, and government referrals through exploration permitting. The Indigenous nations identified through this work were Kwadacha Nation, Tsay Keh Dene Nation, Takla Nation, and Tahltan Central Government. Thesis has been engaging these Indigenous nations on regulatory submissions and negotiated agreements, and these Indigenous nations have contributed meaningfully to exploration program planning and have helped shape early Project planning and design.

Before the commencement of the Early Engagement/Planning Phase, additional potentially impacted Indigenous nations were identified for engagement and consultation by the EAO and IAAC, including Binche Whut'en, Dease River First Nation, Gitxsan - Nii Kyap, Liard First Nation, and Saulneau First Nations. During Early Engagement, Thesis reached out to these Indigenous nations to provide information about the Project and an invitation to meet. Some have provided feedback and comments, either directly to Thesis or through the Early Engagement process (as summarized in the Issues Tracking Table referenced in the JSOIE). Thesis is addressing these comments and looks forward to continued engagement throughout the assessment process.

Thesis's engagement of potentially impacted Indigenous nations will continue to consider and adapt to new information as it becomes available throughout the assessment process.

Thesis recognizes the importance of understanding cultural relationships to the lands that could be impacted by the Project, as well as the importance of gathering information to support the assessment of the Project's potential impacts on Indigenous nations and the rights recognized and affirmed by Section 35 Rights. The Project is at the early stages of the EA process, and Thesis is committed to undertaking assessment work consistent with regulatory requirements, while also seeking to continue to build relationships with Indigenous nations that may be affected by the Project.

As part of the EA process, Thesis will undertake work to inform the assessment of effects of the Project on Indigenous nations and their Section 35 Rights, in keeping with the requirement of Section 25(1) of the *Environmental Assessment Act* (EAA) and Section 22(1)(c) of the IAA. The assessment will also consider positive and negative direct and indirect effects of the Project, including environmental, economic, social, cultural and health effects, effects on current and future generations, as well as consistency with land use plans.

Table 2-3 summarizes how the key issue related to Indigenous engagement and consultation will also be addressed by existing legislative and regulatory frameworks (i.e., provincial or federal legislation or regulations), through the application of standard mitigation measures, including those identified by IAAC, or through Thesis' commitments to best practices, policies or standards, or a combination of these methods.

Table 2-3: Relevant Federal, Provincial, and Mitigation Pathways for Indigenous Engagement and Consultation

Key Issue	Relevant Federal Permitting or Authorizations	Relevant Provincial Permitting or Authorizations	Initial Mitigation Measures
<p>Concerns relate to whether the assessment process is sufficiently inclusive, fair, and credible from an Indigenous rights perspective. Some Indigenous nations have indicated they were not engaged early or meaningfully by the Proponent, raising concerns about unequal participation and missed opportunities to influence project design and decision-making.</p> <ul style="list-style-type: none"> Clarify the process to support meaningful engagement and consultation with Indigenous groups that builds trust and recognizes Indigenous rights and cultural relationships to the land. 	<p>The Lawyers-Ranch Project (the Project) will be subject to federal authorizations and permits, as outlined in the Initial Project Description. Approvals and permits where consultation with Indigenous nations is likely to involve consideration of impacts on Indigenous culture and rights include:</p> <ul style="list-style-type: none"> <i>Fisheries Act</i> Authorization under Paragraphs 34.4(2)(b) and 35(2)(b) (Government of Canada 1985). Migratory Birds Convention Act, 1994 Authorization. Species at Risk Act Permit. Metal and Diamond Mining Effluent Regulations, Schedule 2 under the <i>Fisheries Act</i>. 	<p>The project will be subject to a number of provincial approvals and permits, as outlined in the Initial Project Description. Approvals and permits where consultation with Indigenous nations is likely to involve consideration of impacts on Indigenous culture and rights include:</p> <ul style="list-style-type: none"> Environmental Assessment (EA) Certificate under the British Columbia (BC) <i>Environmental Assessment Act</i>, 2018, including relevant regulations and policies <i>Heritage Conservation Act</i> s. 12.2 Heritage Inspection Permit or Heritage Investigation Permit; s. 12.4 [Site] Alteration Permit. Mines Act Permit, <i>Mines Act</i> (BC Gov 1996a). Water Sustainability Act Approval, <i>Water Sustainability Act</i> and corresponding Dam Safety Regulation (BC Gov 2014, 2016). 	<p>Thesis is committed to ongoing engagement with potentially impacted Indigenous nations and working in accordance with the agreements that is has reached with a number of nations.</p> <p>Potential effects and the proposed measures to avoid, mitigate, or accommodate them will be informed by input provided by potentially impacted Indigenous nations through the EA process.</p> <p>The following standard mitigation frameworks from federal authorities will be considered in the planning of the Project</p> <ul style="list-style-type: none"> Standard mitigation measures (IAAC 2026) for: <ul style="list-style-type: none"> Fish and fish habitat. Current use of lands and resources for traditional purposes. Health, social, and economic conditions of Indigenous peoples. Physical and cultural heritage and structures, sites or things of historical, archaeological, paleontological or architectural significance. <p>Site-specific mitigation measures will be determined during the EA process. The potential effects of the Project will be assessed with consideration of the provincial Effects Assessment Policy (EAO 2020b), including the consideration of avoidance, reduction, restoration, and offsetting measures. Site-specific measures will be determined after the determination of potential effects and will first consider avoidance through Project design. Thesis will continue discussions with Indigenous Groups and regulatory authorities as design advances.</p> <p>The following standard frameworks from provincial authorities will be considered in the planning of the Project</p> <ul style="list-style-type: none"> Guide to Indigenous Knowledge in Environmental Assessments, v2.0 (EAO 2022). Guide to Consensus Seeking under the <i>Environmental Assessment Act</i>, 2018 (EAO 2020).

2.4 Indigenous Peoples' Physical and Cultural Heritage, Current Use of Lands and Resources for Traditional Purposes and Rights

Concerns were raised about the potential for the Project to adversely impact the meaningful exercise of Aboriginal and Treaty rights protected under Section 35 of the *Constitution Act, 1982*. These concerns relate primarily to effects on and access to lands, waters, wildlife, and culturally significant areas that support traditional activities such as hunting, fishing, trapping, plant harvesting, travel, and cultural practices.

Specific concerns include:

- Potential changes to water quality and quantity that could impact drinking water sources, human health and fish habitat.
- Disturbance to fish, wildlife, and migratory species that may reduce quality and availability of culturally important species.
- Disruption of culturally significant landscapes, archaeological areas, and established travel routes that underpin cultural continuity and Indigenous knowledge transmission.
- Potential impacts and changes to the safety of Indigenous women and population sub-groups (LGBTQIA2S+).

Additional concern was raised regarding cumulative impacts from existing and reasonably foreseeable resource development in the region, which could incrementally erode the long-term ability of Indigenous Nations to exercise their rights.

Provide details on the potential adverse impacts of the project on Section 35 rights, information on measures proposed to avoid, mitigate, or accommodate these effects, and clarify how Indigenous perspectives, Indigenous knowledge, and ongoing engagement would be incorporated to ensure the protection of the meaningful exercise of those rights.

Thesis acknowledges the specific concerns outlined and is committed to engaging with potentially impacted Indigenous nations to understand how the Project may affect the meaningful exercise of their Section 35 Rights. The specific matters raised align with subject matter anticipated to be assessed through the course of the EA, including Surface Water, Fish and Fish Habitat, Wildlife, Archaeology, Land and Resource Use, Human Health, Community Health and Well-Being (including effects on Indigenous women and underrepresented or marginalized groups), and Infrastructure and Services. Potential effects within each of these disciplines, and proposed measures to avoid, mitigate, or accommodate them, will be informed by input provided by potentially impacted Indigenous nations through the EA process.

Thesis recognizes that the existing EA process requires examination and assessment of the matters raised by Indigenous nations. Specifically, Section 25(1) of the EAA requires assessment of the potential effects of the Project on Indigenous nations and their Section 35 Rights. As well, Section 25(2) requires consideration of a comprehensive set of factors in assessing the Project, including positive and negative direct and indirect effects (environmental, economic, social, cultural, and health); adverse cumulative effects; effects on current and future generations; disproportionate effects on distinct human populations, including populations identified by gender; and effects on biophysical factors that support ecosystem function.

The assessment process also considers Indigenous Knowledge shared by potentially impacted Indigenous nations, and the adequacy of proposed measures to mitigate the Project's potential effects. These factors overlap directly with each of the specific concerns raised. Thesis is committed to undertaking meaningful engagement with Indigenous nations on their specific concerns, and including this information in the assessment process, consistent with the requirements of the BC EAA.

The EAA's required assessment factors are consistent with those outlined in Section 22 of the federal IAA, which include changes to the environment or to the health, social, and economic conditions of Indigenous Peoples; impacts on Indigenous groups and on Section 35 Rights (including cultural rights and rights to use lands and resources for traditional purposes); the adequacy of mitigation measures; adverse cumulative effects; Indigenous Knowledge; and the intersection of sex and gender with other identity factors. Thesis will undertake relevant engagement and data gathering to inform the required assessments, and is committed to continued engagement with Indigenous nations on their specific concerns.

Thesis will continue to invite potentially impacted Indigenous nations to share information on their rights, interests, use of lands, waters, and resources, and Indigenous Knowledge, and to identify their preferred methods for incorporating this information into the EA. Where Indigenous Knowledge is shared with Thesis, it will be handled in accordance with the Indigenous nation's protocols and reflected in the EA Application, as appropriate. Engagement on potential effects and mitigations will continue through subsequent EA phases and through federal and provincial permitting, providing further opportunities for input on the protection of the meaningful exercise of Section 35 Rights.

Specific effects pathways and proposed measures to avoid, mitigate, or accommodate adverse effects will be characterized in the EA Application across the relevant disciplines, informed by technical studies, regulatory direction, and input received from potentially impacted Indigenous nations.

Table 2-4 summarizes how the key issue related to Indigenous Peoples' physical and cultural heritage, current use of lands and resources for traditional purposes and rights will be addressed by existing legislative and regulatory frameworks (i.e., provincial or federal legislation or regulations), through the application of standard mitigation measures, including those identified by IAAC, or through Thesis' commitments to best practices, policies or standards, or a combination of these methods.

Table 2-4: Relevant Federal, Provincial, and Mitigation Pathways for Indigenous Peoples' Physical and Cultural Heritage, Current Use of Lands and Resources for Traditional Purposes and Rights

Key Issue	Relevant Federal Permitting or Authorizations	Relevant Provincial Permitting or Authorizations	Initial Mitigation Measures
<p>Concerns were raised about the potential for the project to adversely impact the meaningful exercise of Aboriginal and Treaty rights protected under Section 35 of the <i>Constitution Act, 1982</i>. These concerns relate primarily to effects on and access to lands, waters, wildlife, and culturally significant areas that support traditional activities such as hunting, fishing, trapping, plant harvesting, travel, and cultural practices.</p> <p>Specific concerns include:</p> <ul style="list-style-type: none"> • Potential changes to water quality and quantity that could impact drinking water sources, human health, and fish habitat; • Disturbance to fish, wildlife, and migratory species that may reduce quality and availability of culturally important species; • Disruption of culturally significant landscapes, archaeological areas, and established travel routes that underpin cultural continuity and Indigenous knowledge transmission; and • Potential impacts and changes to the safety of Indigenous women and population sub-groups (LGBTQIA2S+). <p>Additional concern was raised regarding cumulative impacts from existing and reasonably foreseeable resource development in the region, which could incrementally erode the long-term ability of Indigenous nations to exercise their rights.</p> <p>Provide details on the potential adverse impacts of the project on Section 35 rights, information on measures proposed to avoid, mitigate, or accommodate these effects, and clarify how Indigenous perspectives, Indigenous knowledge, and ongoing engagement would be incorporated to ensure the protection of the meaningful exercise of those rights.</p>	<p>The Lawyers-Ranch Project (the Project) will be subject to federal authorizations and permits, as outlined in the Initial Project Description. Approvals and permits where consultation with Indigenous nations is likely to involve consideration of impacts on Indigenous Peoples' Physical and Cultural Heritage, Current Use of Lands and Resources for Traditional Purposes and Rights include:</p> <ul style="list-style-type: none"> • <i>Fisheries Act</i> Authorization under Paragraphs 34.4(2)(b) and 35(2)(b) (Government of Canada 1985). • Migratory Birds Convention Act, 1994 Authorization. • Species at Risk Act Permit. • Metal and Diamond Mining Effluent Regulations, Schedule 2 under the <i>Fisheries Act</i>. 	<p>The project will be subject to a number of provincial approvals and permits, as outlined in the Initial Project Description. Approvals and permits where consultation with Indigenous nations is likely to involve consideration of impacts on Indigenous Peoples' Physical and Cultural Heritage, Current Use of Lands and Resources for Traditional Purposes and Rights include:</p> <ul style="list-style-type: none"> • Environmental Assessment (EA) Certificate under the BC <i>Environmental Assessment Act</i>, 2018, including relevant regulations and policies. • <i>Heritage Conservation Act</i> s. 12.2 Heritage Inspection Permit or Heritage Investigation Permit; s. 12.4 [Site] Alteration Permit. • Mines Act Permit, <i>Mines Act</i> (BC Gov 1996a). • Water Sustainability Act Approval, <i>Water Sustainability Act</i> and corresponding Dam Safety Regulation (BC Gov 2014, 2016). • Water License, Water Sustainability Act. 	<p>Thesis is committed to ongoing engagement with Indigenous nations and working in accordance with the agreements that it has reached with a number of nations.</p> <p>Potential effects and the proposed measures to avoid, mitigate, or accommodate them, will be informed by input provided by potentially impacted Indigenous nations through the EA process.</p> <p>The following standard mitigation frameworks from federal authorities will be considered in the planning of the Project</p> <ul style="list-style-type: none"> • Standard mitigation measures (IAAC 2026) for: <ul style="list-style-type: none"> ○ Fish and fish habitat. ○ Migratory birds. ○ Current use of lands and resources for traditional purposes. ○ Health, social and economic conditions of Indigenous peoples. ○ Physical and cultural heritage and structures, sites or things of historical, archaeological, paleontological, or architectural significance. <p>The following standard frameworks from provincial authorities will be considered in the planning of the Project</p> <ul style="list-style-type: none"> • Application Information Requirements Guidelines (EAO 2026). • Application Information Requirements Mining Sector Supplement (EAO 2025). • Effects Assessment Policy (EAO 2020b). • Human and Community Wellbeing – Guidelines for Assessing Social, Economic, Cultural and Health Effects in EA in BC (EAO 2020c). • Guide to Indigenous Knowledge in Environmental Assessments, v2.0 (EAO 2022). • Guide to Consensus Seeking under the <i>Environmental Assessment Act</i>, 2018 (EAO 2020a) <p>Site-specific mitigation measures will be determined during the EA process. The potential effects of the Project will be assessed with consideration of the provincial Effects Assessment Policy (EAO 2020b), including the consideration of avoidance, reduction, restoration, and offsetting measures. Site-specific measures will be determined after the determination of potential effects and will first consider avoidance through Project design. Thesis will continue discussions with Indigenous Groups and regulatory authorities as design advances. Some site-specific mitigation that may be considered during the EA process are:</p> <ul style="list-style-type: none"> • Cultural awareness training for all employees; and • Maintain access to certain areas for the exercising of Aboriginal Rights.

2.5 Health, Social, and Economic Conditions of Indigenous Peoples

- Concern that Project impacts on land, water, country foods, access to cultural areas, and cumulative environmental change may adversely affect physical, mental, emotional, and spiritual well-being.
- Concern that disturbance to culturally significant sites, harvesting areas, and land access could affect cultural continuity, intergenerational knowledge transmission, and community well-being.
- Concern that impacts to wildlife, plants, waters, and access could affect food security and land-based activities, alongside broader socio-economic pressures from large-scale industrial development.

This thesis acknowledges the concerns outlined above and is committed to engaging with potentially impacted Indigenous nations to understand how the Project may affect their interests, including health, social, and economic conditions, which further includes physical, mental, emotional, and spiritual well-being, cultural continuity, intergenerational knowledge transmission, and food security. The concerns raised align with subject matter anticipated to be assessed in the EA Application, including in undertaking assessments of potential impacts on biophysical values such as Surface Water, Fish and Fish Habitat, and Wildlife, as well as cultural and human environment values including Archaeology, Land and Resource Use, Human Health, Community Health and Well-Being (including effects on Indigenous women and underrepresented or marginalized groups), and Infrastructure and Services. Potential effects within each of these subjects, and proposed measures to avoid, mitigate, or accommodate them, will be informed by input provided by potentially impacted Indigenous nations through the EA and characterized in the EA Application.

The BC EA process is designed to address concerns such as these. Section 25(1) of the EAA requires the BC EAO to assess the potential effects of the Project on Indigenous nations and their Section 35 Rights. As well, Section 25(2) requires the BC EAO to consider a comprehensive set of factors in assessing the Project, including positive and negative direct and indirect effects (environmental, economic, social, cultural, and health); adverse cumulative effects; effects on current and future generations; disproportionate effects on distinct human populations, including populations identified by gender; and effects on biophysical factors that support ecosystem function; and community knowledge and Indigenous Knowledge that is provided to the BC EAO. The BC EAO will also consider Indigenous Knowledge shared by potentially impacted First Nations, and the adequacy of proposed measures to mitigate the Project's potential effects. These factors overlap directly with each of the specific concerns raised.

The EAA's required assessment factors are consistent with those outlined in Section 22 of the federal IAA, which include changes to the environment and to the health, social, and economic conditions of Indigenous Peoples; impacts on Indigenous groups and on Section 35 Rights (including cultural rights); the adequacy of mitigation measures; adverse cumulative effects; Indigenous Knowledge; and the intersection of sex and gender with other identity factors. The Project's potential effects on these factors that are shared by the requirements of the EAA will be assessed as part of the EA.

Thesis's approach to engaging potentially impacted Indigenous nations is described in the response to the comments in Section 2.3 above. Thesis is committed to creating opportunities for Indigenous nations to share information – such as Indigenous Knowledge and perspectives – relevant to characterizing the Project's potential effects and identifying strategies to address them. Continued engagement through subsequent EA phases and federal and provincial permitting will provide further opportunities for input on the protection of well-being, cultural continuity, and the meaningful exercise of Section 35 Rights.

Table 2-5 summarizes how the key issue related to health, social, and economic conditions of Indigenous Peoples will also be addressed by existing legislative and regulatory frameworks (i.e., provincial or federal legislation or regulations), through the application of standard mitigation measures, including those identified by IAAC, or through Thesis' commitments to best practices, policies or standards, or a combination of these methods.

Table 2-5: Relevant Federal, Provincial, and Mitigation Pathways for Health, Social, and Economic Conditions of Indigenous Peoples

Key Issue	Relevant Federal Regulatory Frameworks	Relevant Provincial Regulatory Frameworks	Standard Mitigation Measures
<p>Concern that project impacts on land, water, country foods, access to cultural areas, and cumulative environmental change may adversely affect physical, mental, emotional, and spiritual well-being.</p> <p>Concern that disturbance to culturally significant sites, harvesting areas, and land access could affect cultural continuity, intergenerational knowledge transmission, and community well-being.</p> <p>Concern that impacts to wildlife, plants, waters, and access could affect food security and land-based activities, alongside broader socio-economic pressures from large-scale industrial development.</p>	<p>The Lawyers-Ranch Project (the Project) will be subject to federal authorizations and permits, as outlined in the Initial Project Description. Approvals and permits where consultation with First Nations are likely to involve consideration of impacts on the health, social, and economic conditions of Indigenous peoples include:</p> <ul style="list-style-type: none"> • <i>Fisheries Act</i> Authorization under Paragraphs 34.4(2)(b) and 35(2)(b) (Government of Canada 1985). • Migratory Birds Convention Act, 1994 Authorization. • Species at Risk Act Permit. • Metal and Diamond Mining Effluent Regulations, Schedule 2 under the <i>Fisheries Act</i>. 	<p>The Project will be subject to a number of provincial approvals and permits, as outlined in the Initial Project Description. Approvals and permits where consultation with First Nations is likely to involve consideration on the health, social, and economic conditions of Indigenous peoples include:</p> <ul style="list-style-type: none"> • Environmental Assessment (EA) Certificate under the BC <i>Environmental Assessment Act</i>, 2018, including relevant regulations and policies. • <i>Heritage Conservation Act</i> s. 12.2 Heritage Inspection Permit or Heritage Investigation Permit; s. 12.4 [Site] Alteration Permit. • Mines Act Permit, <i>Mines Act</i> (BC Gov 1996a). • Water Sustainability Act Approval, <i>Water Sustainability Act</i> and corresponding Dam Safety Regulation (BC Gov 2014, 2016). • Water License, Water Sustainability Act. • Permit for Regulated Activities, <i>Public Health Act</i>. 	<p>Thesis is committed to ongoing engagement with Indigenous nations and working in accordance with the agreements that is has reached with a number of nations.</p> <p>Potential effects and the proposed measures to avoid, mitigate, or accommodate them, will be informed by input provided by potentially impacted Indigenous nations through the EA process.</p> <p>The following standard mitigation frameworks from federal authorities will be considered in the planning of the Project</p> <ul style="list-style-type: none"> • Standard mitigation measures (IAAC 2026) for: <ul style="list-style-type: none"> ○ Fish and fish habitat. ○ Migratory birds. ○ Current use of lands and resources for traditional purposes. ○ Health, social and economic conditions of Indigenous peoples. ○ Physical and cultural heritage and structures, sites or things of historical, archaeological, paleontological or architectural significance. <p>The following standard frameworks from provincial authorities will be considered in the planning of the Project</p> <ul style="list-style-type: none"> • Application Information Requirements Guidelines (EAO 2026). • Application Information Requirements Mining Sector Supplement (EAO 2025). • Effects Assessment Policy (EAO 2020b). • Human and Community Wellbeing – Guidelines for Assessing Social, Economic, Cultural and Health Effects in EA in BC (EAO 2020d). • Guide to Indigenous Knowledge in Environmental Assessments, v2.0 (EAO 2022). • Guide to Consensus Seeking under the <i>Environmental Assessment Act</i>, 2018 (EAO 2020a). <p>Site-specific mitigation measures will be determined during the EA process. The potential effects of the Project will be assessed with consideration of the provincial Effects Assessment Policy (EAO 2020b), including the consideration of avoidance, reduction, restoration, and offsetting measures. Site-specific measures will be determined after the determination of potential effects and will first consider avoidance through Project design. Thesis will continue discussions with Indigenous Groups and regulatory authorities as design advances.. Some site-specific mitigations that may be considered during the EA process are:</p> <ul style="list-style-type: none"> • Cultural awareness training for all employees; and • Maintain access to certain areas for the exercising of Aboriginal rights.

3.0 Conclusion

Thesis has prepared this response to address key federal issues identified by the IAAC in the JSOIE. This document outlines how federal requirements will be addressed through existing regulator mechanisms, and specifically with adherence to provincial requirements as the Project continues through the EAO process, with coordination across both assessment streams. As the EA process advances, including a pending decision on substitution, Thesis anticipates ongoing federal requirements and is committed to continued engagement.

Next steps include continuing to advance the Project engineering and design, refining the assessment scope, and addressing the key federal issues identified in the JSOIE. Future opportunities for engagement and input with regulators, Indigenous nations, and stakeholders are anticipated to help shape the scope of the assessment, inform Project design, and incorporate concerns throughout the EA and permitting process.

4.0 References

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