

Joint Summary of Issues and Engagement

LAWYERS-RANCH PROJECT

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

Pursuant to Section 14(1) of the Impact Assessment Act, S.C. 2019, c.28, s.1

MAY 8, 2026

INTRODUCTION

Thesis Gold and Silver Inc. (Thesis) is proposing the construction, operation, reclamation and closure of a new gold-silver mine located 275 kilometers north of Smithers, British Columbia (B.C.). As proposed, the Lawyers-Ranch Project (the project) would include open-pit and underground mining facilities, an ore processing plant (metal mill), a tailings management facility (TMF), waste rock storage facilities, an accommodation complex and a 70-kilometer transmission line extension. The project would have a maximum production capacity of 5.5 million tonnes of ore per year (approximately 15,000 tonnes per day) over a mine life of 14 to 20 years and would be located on the site of the former Cheni Mine.

The production capacity of the project means that it is subject to consideration under the B.C. *Environmental Assessment Act* (2018) (the B.C. Act) and federal *Impact Assessment Act* (IAA).

On December 19, 2025, the Environmental Assessment Office (EAO) approved the Initial Project Description (IPD) and Engagement Plan for the project, and the Impact Assessment Agency of Canada (IAAC) determined that the project meets the definition of a designated project under the IAA and that the IPD meets federal requirements. These actions by the EAO and IAAC marked the beginning of the Early Engagement phase and the Planning phase of the assessments, respectively.

The Early Engagement and Planning phases are important preparatory stages during which meaningful conversations can begin about the project prior to the EAO determining the requirements for a provincial environmental assessment, and prior to IAAC determining whether further federal impact assessment is required.

To support the Early Engagement and Planning phases, the EAO and IAAC shared the IPD with potentially affected First Nations, provincial and federal subject matter experts, and the public to invite questions and better understand perspectives on the Project.

This Joint Summary of Issues and Engagement (Joint Summary) was prepared and issued by the EAO and IAAC. The Joint Summary includes:

- A summary of early engagement with First Nations;
- A summary of comments received from the public and provincial and federal subject matter experts;
- Direction from the EAO to Thesis to consider and respond to comments received during Early Engagement; and
- Direction from IAAC to Thesis to consider and respond to a list of key issues identified during the Planning phase.

FIRST NATIONS' EARLY ENGAGEMENT

The following First Nations indicated that the project, including the proposed transmission line and access routes, is located in their asserted territories: Binche Whut'en, Dease River First Nation, Gitxsan - Nii Kyap, Kwadacha Nation, Liard First Nation, Saulteau First Nations, Tahlitan Central Government, Takla Nation, Tsay Keh Dene Band, and West Moberly First Nations.

On October 16, 2025, IAAC provided potentially impacted Indigenous nations with an early notification of the project and an early engagement opportunity. On January 8, 2026, IAAC and EAO sent joint letters to potentially impacted Indigenous nations at the beginning of the Early Engagement and Planning phases to identify Indigenous nations' interest in the project, how potentially affected First Nations may want to be involved in the assessment.

These letters also sought any views on the [EAO's request](#) that Canada substitute its impact assessment process to B.C. who would carry out the review on Canada's behalf, should a federal assessment be required. If a project requires assessments by both federal and provincial governments, the province can ask to lead the process on behalf of both levels

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of government, using its assessment process and following its timelines. Substitution allows for a single assessment that meets federal and provincial requirements, supporting the goal of "one project, one review".

Under the B.C. Act, Indigenous nations can self-identify, within 80 days of Early Engagement starting, to be a participating Indigenous nation for the assessment of a project. Participating Indigenous nations have specific procedural rights under the B.C. Act, including consensus-seeking, issue resolution protocols, dispute resolution, and the opportunity to carry out an assessment of the impacts of the project on the nation and their section 35 rights. The following nations provided notification identifying as participating Indigenous nations:

- Kwadacha Nation;
- Liard First Nation;
- Tahltan Central Government;
- Takla Nation; and
- Tsay Keh Dene Band.

On March 17, 2026, [Thesis requested to IAAC](#) to extend the time limit for the Planning Phase and the issuance of the Joint Summary by IAAC and EAO by 50 days (to May 8, 2026) to allow for further engagement with Indigenous nations and to allow for more time for Indigenous nations to submit comments on the IPD. In response, on March 20, 2026, [IAAC suspended the time limit](#) for up to 50 days for the Planning Phase under the Impact Assessment Act.

[Table 1](#) summarizes IAAC's and the EAO's preliminary understanding of Indigenous nations' concerns related to their interests in the project area and activities associated with the project. Some Indigenous nations provided comments related to substitution; those will be considered in the Minister of the Environment, Climate Change, and Nature's decision on substitution for the project. In the coming weeks, IAAC and the EAO will engage more deeply with First Nations about substitution and ensuring federal and provincial responsibilities to First Nations are fully carried out. The EAO and IAAC will continue to work with each Nation's representatives to understand how they wish to be engaged and/or consulted.

To read the full comments received from Indigenous nations, see the issues tracking table available on EAO's [EPIC website](#).

Table 1: Preliminary Understanding of Indigenous Comments

Indigenous Nation	Summarized Understanding of Comments
Kwadacha Nation (Participating Indigenous nation)	<ul style="list-style-type: none"> • Need for sufficient water quality monitoring (drinking water quality), especially for Toadoggone River, which flows to the Finley River. • Concerns regarding the hauling in and out of contaminated materials and ore, especially through sensitive wetland areas.
Liard First Nation (LFN) (Participating Indigenous nation)	<ul style="list-style-type: none"> • Need for Thesis to assess how the project could impact their Kaska rights.
Tahltan Central Government (TCG) (Participating Indigenous nation)	<ul style="list-style-type: none"> • Need for more data and information regarding air quality, dust and particulate matter, and greenhouse gas emissions baseline data and sufficient monitoring including from sources such as diesel generators, incinerators/burning, and roads.

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	<ul style="list-style-type: none"> Concerns regarding potential environmental impacts from with tailings management, potentially acid generating (PAG) waste, water quality, groundwater, and hydrogeological flows. Strong concern about on-going water management through the life of the mine and during closure. Need for proactive closure design, remediation, and reclamation plans. Requested further information and consideration of explicit human health pathways, including impacts to Indigenous women and population sub-groups. TGC identified impacts to human health as an information gap in the IPD (particularly a Human Health Risk Assessment and/or Community Wellbeing Assessment). Seeking further clarification on the potential use, impacts, and remediation of historic mine infrastructure.
Tsay Keh Dene Band (TKD) (Participating Indigenous nation)	<ul style="list-style-type: none"> Indicated interest in continued collaboration with the proponent on project planning and design, and that the reduced footprint of the originally proposed project helped alleviate concerns. Indicated their willingness to continue participating in a broader discussion about cumulative effects in the Toodoggone area with the province.
Saulteau First Nations (SFN)	<ul style="list-style-type: none"> Seeking more detailed information about tailings management, water and air quality, wildlife (particularly bats), and vegetation.
Binche Whut'en	<ul style="list-style-type: none"> Concerns regarding potential adverse effects on Indigenous rights. Concerns regarding impacts to lands, waters, wildlife, habitat integrity, and culturally important sites, including cumulative effects and potential restrictions on, and access to traditional use and harvesting areas. Concerns regarding potential health, social, and economic effects arising from project impacts on land, resources, and community life.

PROVINCIAL, FEDERAL AND LOCAL GOVERNMENT ENGAGEMENT

The EAO and IAAC requested comments on the IPD from provincial, federal, and regional government agencies whose mandates interact with the environmental assessment of the project:

- B.C. Ministry of Energy and Climate Solutions;
- B.C. Ministry of Environment and Parks;
- B.C. Ministry of Forests;
- B.C. Ministry of Housing and Municipal Affairs;
- B.C. Ministry of Jobs and Economic Growth;

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- B.C. Ministry of Mining and Critical Minerals;
- B.C. Ministry of Post-Secondary Education and Future Skills;
- B.C. Ministry of Water, Lands, and Resource Stewardship;
- Crown-Indigenous Relations and Northern Affairs Canada;
- Environment and Climate Change Canada;
- Employment and Social Development Canada;
- Fisheries and Oceans Canada;
- Health Canada;
- Natural Resources Canada;
- Transport Canada;
- Women and Gender Equality Canada;
- Northern Health Authority;
- Peace River Regional District; and
- Regional District of Bulkley-Nechako.

Provincial, federal, and local governments' comments included advice regarding requirements for conducting the assessments and information requirements for provincial and federal authorizations. They provided standards/guidelines that the proponent should refer to when developing information and methods and sought clarity on responsibilities associated with the historic mine infrastructure.

With respect to potential effects of the project, technical advisors' comments focused on the need to assess and address potential effects on:

- Water quantity and quality, including surface water and groundwater management, treatment requirements, tailings, and interactions with existing or abandoned mine infrastructure. Technical reviewers also sought more information on point and non-point source water discharges and associated mitigations and monitoring, and water quality impacts to human health.
- Human health, including the need for a complete Human Health Risk Assessment (HHRA). Detailed information about the industrial camp – such as health, safety and waste management – was requested.
- Fish and fish habitat and wildlife, including migratory birds, caribou, and species at risk;
- Air quality and health impacts, including from dust;
- Socio-economic conditions, including local and Indigenous training and employment, workforce projections, contracting opportunities, positive economic impacts, impacts to community services and social, health, and cultural considerations for on- and off-duty workers;
- Indigenous peoples, particularly disproportionate impacts to Indigenous women, girls and population sub-groups; and
- Accidents and malfunctions, climate change resilience, and the potential need for a net-zero plan for greenhouse gas emissions.

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All comments received from provincial and federal technical advisors are available in a tracking table posted on the EAO's [EPIC website](#).

PUBLIC ENGAGEMENT

As part of the Early Engagement and Planning phase, the EAO and IAAC held a joint public comment period from January 13, 2026, to February 12, 2026. During the public comment period, the EAO and IAAC hosted two virtual information sessions. This section summarizes the comments received from the public comment period on the EAO's [EPIC.engage](#) website and IAAC's [Canadian Impact Assessment Registry](#).

Response to public engagement was relatively limited. Seven people submitted comments during the joint public comment period. Three commenters provided concerns about potential environmental impacts, especially in proximity to sensitive areas, and the need for environmental protections and baseline studies. One commenter raised concern regarding First Nations' rights and consent. Three commenters were supportive of the project, citing the need for jobs and economic development in the region.

RESPONSE TO THE JOINT SUMMARY TO MEET PROVINCIAL REQUIREMENTS

As part of preparing the Detailed Project Description (DPD) and to support the EAO's Readiness Decision, the EAO requires Thesis to respond to all comments submitted to the EAO and IAAC, including comments from Indigenous nations, government agencies, and members of the public. The proponent should refer to the original comments received from reviewers in addition to the summaries provided in this Joint Summary.

Responses should indicate how issues were addressed or will be in a future phase of the assessment. For efficient review of the DPD, the EAO also recommends that the proponent prepare a concordance table, which is a consolidated issues tracking table that identifies how or where comments are addressed in the DPD.

RESPONSE TO THE JOINT SUMMARY TO MEET FEDERAL REQUIREMENTS

Based on the comments received from First Nations, technical advisors, and the public on the IPD, IAAC has identified key issues for the project within federal jurisdiction ([Table 2](#)). These key issues are those that: are factors in federal decision-making, have a pathway to an effect within federal jurisdiction, and are a major concern that is raised by a First Nation, federal authorities, provincial ministries, or the public.

IAAC requires that Thesis consider these key issues and provide a response. A high-level response will be sufficient. Where relevant, IAAC encourages Thesis to identify if the key issues will be addressed through existing legislative and regulatory frameworks (i.e. provincial or federal legislation or regulations), through the application of standard mitigation measures including the standard mitigation measures identified by IAAC, or through Thesis' commitments to best practices, policies or standards, or a combination of these methods.

Table 2: Key Issues Within Federal Jurisdiction

Key Issue	Description
Fish and Fish Habitat	<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"> ➤ 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

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Key Issue	Description
	<p>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"> ➤ 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.
Migratory Birds and Species at Risk	<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). <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 IAAC 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"> ➤ 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.
Indigenous Engagement and Consultation	<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 recognises Indigenous rights and cultural relationships to the land.
Indigenous Peoples' Physical and Cultural Heritage, Current Use of Lands and Resources for Traditional Purposes and Rights	<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</p>

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Key Issue	Description
	<p>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> <ul style="list-style-type: none"> ➤ Provide details on the potential adverse impacts of the project on Section 35 rights and on Indigenous current use of lands and resources for traditional purposes, 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.
Health, Social, and Economic Conditions of Indigenous peoples	<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>

CONCLUSION

Thesis is now required to carry out the direction of the EAO and respond to IAAC's key issues found in this Joint Summary. The Joint Summary, along with the additional required materials provided by Thesis, will be used to inform IAAC's and EAO's upcoming assessment decisions.