Parks Canada Parcs Canada

June 24, 2024

Nahanni National Park Reserve
Parks Canada
PO Box 348
Fort Simpson NT X0E 0N0

Mark Cliffe-Phillips
Executive Director
Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
PO BOX 938
Yellowknife NT X1A 2N7

Sent by email

Dear Mark Cliffe-Phillips,

Implementation of the Canadian Zinc Corporation All-Season Road Environmental Assessment Measures– PCA 2024 Annual Report for EA1415-01:

Parks Canada is submitting *Implementation of the Canadian Zinc Corporation All-Season Road Environmental Assessment Measures– PCA 2023 Annual Report for EA1415-01*, for July 1, 2022 to June 30, 2023. This report is required as per Measure 15-3 in *EA1415-01: Canadian Zinc Corp., Prairie Creek All Season Road Project, Report of Environmental Assessment and Reasons for Decision:*

> *Measure 15-3: Annual reporting from government and regulatory authorities*
>
> *In order to evaluate the effectiveness of mitigation measures for the protection of the environment, each regulatory authority or government that is wholly or partly responsible for implementation of any measure in this Report of EA will prepare an annual Report on Implementation of Measures. The Report will:*
>
> *a) describe the actions being undertaken to implement the measures or the part(s) of the measures for which the regulatory authority or government is responsible; and*
> *b) explain how these actions, including those implemented through adaptive management, fulfill the intent of the EA measures, including consideration of the following questions:*
> *i. How are implementation actions addressing a likely significant adverse impact on the environment?*
> *ii. How effective are implementation actions at reducing, controlling, or eliminating the impact or its likelihood?*

Government and regulators will provide a copy of this annual report to the Review Board by June 30 of each year.

Parks Canada will submit a report each year for the duration of this project. Parks Canada intends to use these reports to support the adaptive management process by a) capturing specific licensing requirements as they evolve to achieve the EA measures and b) provide the board and the public registry a written record of the performance of all parties in completing measures.

Parks Canada will continue to take a coordinated approach and work with resource management boards, the Government of the Northwest Territories, NorZinc Ltd., and other parties to the Prairie Creek All Season Road Environmental Assessment (EA 1415-01) on measure implementation and reporting. Please contact Alexandra Taylor at (250) 683-8170 with any questions or concerns regarding this letter and the attached report.

Sincerely,

Jonathan Tsetso
Superintendent
Nahanni National Park Reserve
PO Box 348
Fort Simpson NT X0E 0N0
Parks Canada

Preamble

Parks Canada (PCA) has prepared this report to address measure 15-3: Annual reporting from government and regulatory authorities from EA1415-01, outlined below for reference. In the interest of consistency PCA is adopting a format similar to that of GNWT. It is PCA's intent that all measures in the report of EA be captured by specific licensing requirements within Water License (WL) #PC2014L8-0006 and Land Use Permit (LUP) # PC2014F0013. PCA has included reference to specific licensing requirements as they pertain to achieving specific measures. The LUP, WL and all other pertinent documents can be found on the Mackenzie Valley Land and Water Board public registry: https://mvlwb.com/registry?f%5B0%5D=company_name%3ACanadian%20Zinc%20Corporation. PCA will add increasing amounts of detail in subsequent reports commensurate with project stage. Phase 1 of the ASR project is complete, with the construction and subsequent deactivation of the winter road. Reporting for Phase 1 is underway with NorZinc's Annual Water Licence Report and Annual Land Use Plan Report submitted March 21st. Permitting activities for Phase 2 is also ongoing. PCA intends to use these reports to support the adaptive management process by a) capturing specific licensing requirements as they evolve to achieve the EA measures and b) provide the board and the public registry a written record of the performance of all parties in completing measures.

Note that at the time of EA, the company was called "Canadian Zinc Corporation Ltd" or "CanZinc". The company changed its name in 2018 to "NorZinc". When referring to the EA measures, text is taken directly from the report and therefore the company is referred to as "CanZinc". In the 2024 updates on measure progress, we reference the company by its current name, NorZinc.

Measure 15-3: Annual reporting from government and regulatory authorities

In order to evaluate the effectiveness of mitigation measures for the protection of the environment, each regulatory authority or government that is wholly or partly responsible for implementation of any measure in this Report of EA will prepare an annual Report on Implementation of Measures. The Report will:

a) describe the actions being undertaken to implement the measures or the part(s) of the measures for which the regulatory authority or government is responsible; and
b) explain how these actions, including those implemented through adaptive management, fulfill the intent of the EA measures, including consideration of the following questions:

i. How are implementation actions addressing a likely significant adverse impact on the environment?
ii. How effective are implementation actions at reducing, controlling, or eliminating the impact or its likelihood?

*Government and regulators will provide a copy of this annual report to the Review Board by **June 30** of each year.*

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
Chapter 5. Human Safety	**Measure 5-1: Independent Technical Review Panel**		
	5 -1, Part 1: Introduction In order to prevent significant adverse impacts on people and the environment, CanZinc will establish and fund an independent technical review panel to evaluate and approve the final road design. The developer will follow the final recommendations of the review panel with respect to road design. CanZinc will develop a term of reference for the panel based on the requirements of this measure.	**NorZinc**	WL Part E: 6. WL Part E: 7. WL Part E: 12. LUP Part C: 27. LUP Part C: 32. Panel is established; the Phase 1 Design and Construction Plan was reviewed by the Panel and

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
			accepted in a letter dated 13 December 2021. Phase 1 construction began on November 10th 2022, and was completed on April 30th 2023. Phase 1 construction has been deactivated. Phase 2 Design and Construction Plan has not yet been formally submitted.
	5 -1, Part 2: Panel mandate The mandate of the independent technical review panel will be to provide independent expert advice and recommendations on the design and construction of the road to minimize traffic related accidents, road failure or malfunctions, and any resulting significant adverse impacts on human safety or the environment. The panel will ensure that the road is designed and constructed to an appropriate standard that is highly protective of people and the environment, including consideration of: i. the number and type of mine and non-mine related vehicles expected to use the road; ii. two-way traffic; iii. human safety and minimizing traffic related accidents; iv. permafrost degradation and impacts on water quality; and, v. appropriate road design criteria, including but not limited to: • watercourse crossings; • right of way clearing width; • road alignment, grades, subgrade width, and road widening at curves; • cut and fill slopes, cut and fill slope angles, slope stability; and • number of, and distance between, pullouts.	**NorZinc**	WL Part E: 6. WL Part E: 7. WL Part E: 12. LUP Part C: 27. LUP Part C: 32. Panel is established; the Phase 1 Design and Construction Plan was reviewed by the Panel and accepted in a letter dated 13 December 2021. Phase 1 construction began on November 10th, 2022, and was completed on April 30th, 2023. Phase 1 construction has been deactivated. Phase 2 Design and Construction Plan has not yet been formally submitted.
	5 -1, Part 3: Panel composition At a minimum, the panel will be comprised of three members who are professional engineers and geoscientists. The panel must have expertise in northern road design, including permafrost and mountainous terrain experience. Members of the panel will have knowledge and experience to appropriately address the mandate in Measure 5- 1 part 2 and considerations in Measure 5-1 part 5. CanZinc will engage with Parks Canada, the Mackenzie Valley Land and Water Board, the Government of the Northwest Territories, Nahanni Butte Dene Band, Łíídlı̨ Kų́ę́ First Nation, and Dehcho First Nations on	**NorZinc**	Panel is established Approved panel composition (March 2021): Timothy Smith • J.M. (Jim) Owell • Robert E. Johnson • Lee Deslauriers

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
	the panel composition. Members of the panel will be independent and will be approved by the Mackenzie Valley Land and Water Board and Parks Canada.		
	5 -1, Part 4: Panel activities and timing The panel will be established prior to detailed design of the road. CanZinc will engage with Parks Canada, the Mackenzie Valley Land and Water Board, the Government of the Northwest Territories, Nahanni Butte Dene Band, Łíídlıį Kų́ę́ First Nation, and Dehcho First Nations on the panel activities. CanZinc will provide the panel's reports to Parks Canada and the Mackenzie Valley Land and Water Board. At a minimum, the panel will complete the activities listed below. i. Prior to detailed design of the road: • review and comment on the Panel's terms of reference. ii. During detailed design of the road: • work with CanZinc to review updated information, design plans, and detailed design work, including the terrain stability assessments undertaken for the proposed cut and fill slopes, and the developer's detailed interpretation of the permafrost conditions at the site upon completion of geotechnical site investigation work; and, • provides advice and recommendations for improving road design, following the mandate above, and considering construction, operations and maintenance, closure and reclamation, and temporary closure. iii. Following detailed design of the road: • review the detailed design documents for the road; • provide a preliminary report to CanZinc on the panel's findings and conclusions, including any additional or outstanding recommendations; • review CanZinc's response and justification for any recommendations the developer does not wish to follow; • prepare and submit a final report to CanZinc that includes the panel's findings and conclusions on the final design. iv. During construction:	**NorZinc**	WL Part E: 6. WL Part E: 7. WL Part E: 12. LUP Part C: 27. LUP Part C: 32. Panel is established; the Phase 1 Design and Construction Plan was reviewed by the Panel and accepted in a letter dated 13 December 2021. As indicated in their letter, the Panel examined the DCP, including several revisions based on comments and recommendations made by the Panel. Phase 1 construction began on November 10th 2022, and was completed on April 30th 2023. Phase 1 construction has been deactivated. The Phase 2 Design and Construction Plan has not yet been formally submitted.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
	• work with the developer and regulatory authorities to determine the frequency and nature of the panel's activities during construction (at a minimum, the panel will be consulted and have the opportunity to revise its final report if any material changes to design are made following the panel's report).		
	5-1, Part 5: Other panel considerations The independent technical review panel will also consider any relevant information on the record from EA1415-01, information gathered as a result of relevant CanZinc commitments, and the requirements and outcomes of Review Board measures. This includes, but is not limited to: i. the updated risk assessment (Appendix C, commitment #241); ii. terrain stability assessment reports (Appendix C, commitment #137) and any additional mitigation required to address instability; iii. avalanche related information (Appendix C, commitment #114; Suggestion 5-1); iv. individual detailed borrow site plans and designs (Appendix C, commitment #119); v. geotechnical, geophysical, permafrost, and hydrological investigations (Appendix C, commitments #129, #156, #232, #235; Measure 12-1; Measure 8-1); vi. the Traffic Control Mitigation and Management Plan (Measure 5-2); vii. relevant management plans and proposed mitigations; viii. extreme weather events; ix. climate change; and, **x.** karst features.	**N/A**	Through discussions with the Panel and NorZinc, PCA and LWB ensured that these considerations were captured in the TOR. They have also been captured throughout WL and LUP and in several related management plans. Per the WL and LUP, management plans must be submitted to PCA for approval 90 days prior to commencement of any project activities. The Phase 1 management plans were reviewed and approved by PCA throughout 2022-2023. All Phase 1 management plans have been approved by PCA. The Phase 2 management plans review is ongoing. Drafts of most plans have been provided to PCA, except for: • Borrow Source Optimization Report, • Closure and Reclamation Plan and • Fish and Fish Habitat Protection Plan. Formal submissions of the following plans have occurred: • Avalanche Hazard Plan, • Contaminant loading Management Plan, • Cultural Heritage Protection Plan, • Engagement Plan, Explosives Management Plan,

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
			• Geochemical Verification Plan, • Invasive Species Management Plan, • Rare Plant Management Plan, and • Traffic Control Plan Of these plans, only the: • Engagement, • Explosives, • Cultural Heritage Protection, • Rare Plant and • Traffic Management Plans have met conformity. The Engagement Plan is the only plan with approval to date, although Cultural Heritage Protection and Rare Plants have been provided conditional approval once directives are addressed. Explosives Plan was rejected and must be resubmitted. Traffic Management Plan was out for public comment, which ended May 28, 2024, and NorZinc provided their response on June 13, 2024. PCA is in the process of reviewing all submitted comments and responses.
	Measure 5-2: Traffic Control Mitigation and Management Plan		
	5-2, Part 1: Introduction In order to prevent significant adverse impacts from the Project on human safety, water quality, and wildlife from accidents and increased harvest along the road, CanZinc will create a Traffic Control Mitigation and Management Plan. The purpose of the plan is to manage access control mitigations and all traffic on the road, including mine and non-mine traffic. The plan will consider all Project phases (construction, operation, closure [including temporary closure]) as well as seasonal or weather related closure. This plan will replace Section 7.1 of the Road Operations Plan.	**NorZinc**	LUP Part C: 144 *Traffic Control Mitigation and Road Operations* PCA approved NorZinc's Phase 1 Traffic Control Mitigation and Road Operations and Maintenance Plan on October 21st, 2022.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
	Prior to construction, the developer will submit this plan to the Mackenzie Valley Land and Water Board and Parks Canada for approval, as a condition of respective land use permits. CanZinc will operate in accordance with the approved plan.		The Phase 2 Traffic Control Mitigation and Road Operations and Maintenance Plan was submitted, and the public comment period ended on May 28, 2024. NorZinc's responses to comments were provided on June 13, 2024. PCA is in the process of reviewing all submitted comments and NorZinc's responses.
	5-2, Part 2: Managing traffic on the road CanZinc will include all the mitigations it has identified for controlling non-mine traffic on the road in the Traffic Control Mitigation and Management Plan. The plan will describe roles and responsibilities for non-mine traffic mitigation and monitoring. At a minimum CanZinc will: i. exercise its right to control access on the lease parcels at the Liard River to control non-mine traffic; ii. operate a checkpoint when haul trucks are using the road and document all traffic known to be on the road; and iii. install signs indicating that the road is operated as a mine haul road and any public traffic using the road does so entirely at its own risk. In the Traffic Control Mitigation and Management Plan, CanZinc will also address mitigation and management strategies for all traffic on the road, including how this relates to the Journey Management System that CanZinc intends to use for mine traffic. Mitigations to increase safety on the road with both mine and non-mine traffic present should consider: a) the independent technical review panel's conclusions on road design and safety; and, b) data sources that can provide information about high wildlife collision areas and non-mine traffic presence (such as wildlife camera traps [see Measure 6-3] and the harvest monitoring program[see Suggestion 7-1]). CanZinc will monitor non-mine traffic on the road and establish adaptive management, following the guidance in Appendix B of this Report of EA, within the Traffic Control Mitigation and Management Plan.	**NorZinc**	LUP Part C: 144. *Traffic Control Mitigation and Road Operations* and Maintenance Plan LUP Part C: 71. *Wildlife Management and Monitoring Plan (WMMP)* PCA approved NorZinc's Phase 1 Traffic Control Mitigation and Road Operations and Maintenance Plan on October 21st, 2022. No issues regarding traffic and road safety were reported during Phase 1 construction, which began November 10th 2022, and ended on April 30th 2023. The Phase 2 Traffic Control Mitigation and Road Operations and Maintenance Plan was submitted, and the public comment period ended on May 28, 2024. NorZinc's responses to comments were provided on June 13, 2024. PCA is in the process of reviewing all submitted comments and NorZinc's responses. PCA approved NorZinc's Phase 1 Wildlife Management and Monitoring Plan on October 31st, 2022. Reporting on the Phase 1 wildlife monitoring program was submitted May 7, 2024. This report is out for

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
			public comment until June 19, 2024. It is noted in several sections of the report that data are missing and wildlife observations that can be used to inform understanding of wildlife use around the road have not been consistently recorded. A draft of the Phase 2 Wildlife Management and Monitoring Plan was submitted July 4, 2023 and PCA provided comments to NorZinc September 1, 2023. NorZinc has not formally submitted the Phase 2 Wildlife Management and Monitoring Plan. PCA has had meetings with NorZinc to inform them on information requirements of the plan.
Chapter 6. Wildlife and Wildlife Habita	**Measure 6-1: Wildlife Management**		
	6-1, Part 1: Wildlife baseline information collection, monitoring, mitigation and adaptive management program In order to reduce adverse impacts on wildlife and wildlife habitat so they are no longer significant, the developer will collect additional wildlife baseline information to be integrated with mitigation, focused monitoring, and a systematic approach to adaptive management. In order to accomplish this, CanZinc will: i. collect baseline data as described in Part 2 of this measure; ii. monitor wildlife and wildlife habitat during construction and operations as described in Part 3; iii. incorporate Traditional Knowledge in developing and implementing a monitoring program; and, iv. develop and implement an adaptive management framework to manage impacts on wildlife.	**NorZinc**	LUP Part C: 71. *Wildlife Management and Monitoring Plan (WMMP)* PCA approved NorZinc's Phase 1 Wildlife Management and Monitoring Plan (WMMP) on October 31st, 2022, conditional on three directives outlined in the approval letter. Baseline data (i) and monitoring during construction (ii) are discussed further below. The WMMP incorporates Traditional Knowledge (Section 11.0) and an adaptive management framework (Section 9.0). Reporting on the Phase 1 wildlife monitoring program was submitted May 7, 2024. This report is out for public comment until June 19, 2024. It is noted in

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
			several sections of the report that data are missing and wildlife observations that can be used to understand wildlife use around the road and inform adaptive management have not been consistently recorded. A draft of the Phase 2 Wildlife Management and Monitoring Plan was submitted July 4, 2023, and PCA provided comments to NorZinc September 1, 2023. NorZinc has not formally submitted the Phase 2 Wildlife Management and Monitoring Plan. PCA has had meetings with NorZinc to inform them on information requirements of the plan. A letter was sent to NorZinc on February 9, 2024, to clarify outstanding baseline data requirements.
	6-1, Part 2: Collection of baseline wildlife information for caribou, collared pika and bird species at risk that occur in the area The purpose of this baseline information collection is to confirm the presence or absence of listed wildlife species in the Project area, their population size, seasons of use and important habitat for species described below in the All Season Road corridor. In order to support Part 1, the developer will: a) submit a baseline survey plan for review and approval to Parks Canada within the NNPR and to GNWT on territorial lands; b) conduct baseline surveys for northern mountain caribou, boreal caribou, collared pika, and bird species at risk; c) use recognized methods and standards approved by Parks Canada within NNPR, by GNWT on territorial lands, and by ECCC for species at risk; d) conduct surveys at the direction and approval of Parks Canada within NNPR and of the GNWT on territorial lands; e) complete surveys prior to road construction;	**NorZinc**	LUP Part C: 71. *Wildlife Management and Monitoring Plan (WMMP)* PCA approved NorZinc's Phase 1 Wildlife Management and Monitoring Plan on October 31st, 2022, conditional on three directives outlined in the approval letter. Baseline data was collected by NorZinc, which was used to develop the Phase 1 WMMP, and reported within the WMMP. A draft of the Phase 2 Wildlife Management and Monitoring Plan was submitted July 4, 2023, and PCA provided comments to NorZinc September 1, 2023. NorZinc has not formally submitted the Phase 2 Wildlife Management and Monitoring Plan. PCA has had meetings with NorZinc to inform them on

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
	f) share its baseline wildlife information with Aboriginal organizations, including NBDB, LKFN and DFN; and, g) present the results of its baseline information collection with Aboriginal organizations, including NBDB, LKFN and DFN, in a culturally-appropriate way.		information requirements of the plan. A letter was sent to NorZinc on February 9, 2024, to clarify outstanding baseline data requirements that must be fulfilled prior to Phase 2 WMMP approval.
	6-1, Part 3: Wildlife monitoring programs In order to reduce adverse impacts on wildlife so they are no longer significant, the developer will prepare and implement a systematic monitoring program(s) for wildlife that may be affected by the Project. The developer will: a) submit monitoring program(s) for review and approval to Parks Canada within the NNPR and GNWT on territorial lands; b) focus on monitoring of northern mountain caribou, boreal caribou, collared pika, and bird species at risk; c) use recognized methods and standards approved by Parks Canada within NNPR, by GNWT on territorial lands, and by ECCC for species at risk; d) conduct monitoring through all phases of the Project; e) formalize monitoring programs within the Wildlife Management and Mitigation Plan (Measure 6-2); f) provide annual monitoring reports to Parks Canada, GNWT, ECCC, NBDB, LKFN and DFN; g) share its wildlife monitoring data with Aboriginal organizations including NBDB, LKFN and DFN; and, h) present the results of its wildlife monitoring programs to Aboriginal organizations, including NBDB, LKFN and DFN, in a culturally appropriate way.	**NorZinc**	LUP Part C: 71. *Wildlife Management and Monitoring Plan (WMMP)* PCA approved NorZinc's Phase 1 Wildlife Management and Monitoring Plan on October 31st, 2022, conditional on three directives outlined in the approval letter. The WMMP outlined the wildlife monitoring programs and commitments to be undertaken during Phase 1 construction. Phase 1 construction began on November 10th, 2022, and ended on April 30th, 2023. Reporting on the Phase 1 wildlife monitoring program was submitted May 7, 2024. This report is out for public comment until June 19, 2024. It is noted in several sections of the report that data are missing and wildlife observations that can be used to understand wildlife use around the road and inform adaptive management have not been consistently recorded. A draft of the Phase 2 Wildlife Management and Monitoring Plan was submitted July 4, 2023 and PCA provided comments to NorZinc September 1, 2023. NorZinc has not formally submitted the Phase 2 Wildlife Management and Monitoring Plan. PCA has

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
			had meetings with NorZinc to inform them on information requirements of the plan. A letter was sent to NorZinc on February 9, 2024, to clarify outstanding baseline data requirements.
Chapter 6. Wildlife and Wildlife Habita	**Measure 6-2: Wildlife Management Monitoring Plan**		
	6-2, Part 1: GNWT to require a WMMP In order to reduce adverse impacts on wildlife and wildlife habitat so they are no longer significant, GNWT will require the developer to prepare and implement a Wildlife Management and Monitoring Plan. The GNWT will: a) require that the developer prepare a WMMP under the legal authority of Section 95(1) of the Wildlife Act for portions of the Project in its jurisdiction; and b) include opportunity for public review of and comment on the final WMMP prior to construction and on updates to the WMMP throughout the life of the Project.	**GNWT -ENR**	See GNWT Annual Measures Report
	6-2, Part 2: Parks Canada to require a WMMP In order to reduce adverse impacts on wildlife and wildlife habitat so they are no longer significant, Parks Canada will require the developer to prepare and implement a Wildlife Management and Monitoring Plan. Parks Canada will: a) require that the developer prepare a WMMP as a condition of an authorization for the portions of the road in its jurisdiction; and b) include opportunity for public review of and comment on the final WMMP prior to construction and on updates to the WMMP throughout the life of the Project.	**Parks - NorZinc**	LUP Part C: 71. *Wildlife Management and Monitoring Plan (WMMP)* PCA approved NorZinc's Phase 1 Wildlife Management and Monitoring Plan on October 31st, 2022. A draft of the Phase 2 Wildlife Management and Monitoring Plan was submitted July 4, 2023 and PCA provided comments to NorZinc September 1, 2023. NorZinc has not formally submitted the Phase 2 Wildlife Management and Monitoring Plan. PCA has had meetings with NorZinc to inform them on information requirements of the plan. A letter was sent to NorZinc on February 9, 2024, to clarify outstanding baseline data requirements.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
	6-2, Part 3: Developer to prepare and implement a WMMP The developer will: a) update its draft WMMP to include all commitments and mitigations agreed to or recommended by its consultants throughout the EA; b) develop an adaptive management framework that links the results of monitoring with adjustments to mitigations as part of the WMMP that satisfies the requirements set out in Appendix B of this report; c) describe how the monitoring data is linked with adaptive management in the Traffic Control and Management Plan; d) submit its updated WMMP to the wildlife regulators described in Parts 1 and 2 for review and approval prior to construction; and e) prepare and submit an annual report to wildlife regulators on the effectiveness of the WMMP that includes a description of how the adaptive management framework was used to address Project impacts.	**NorZinc**	LUP Part C: 71. *Wildlife Management and Monitoring Plan (WMMP)* PCA approved NorZinc's Phase 1 Wildlife Management and Monitoring Plan on October 31st, 2022, conditional on three directives outlined in the approval letter. The WMMP was updated to include commitments and recommendations from the EA process. In addition, the WMMP includes an adaptive management framework (Section 9.0), and a description of how monitoring is related to the Traffic Control and Management Plan (Sections 7.4.2 and 8.0). Phase 1 construction began on November 10th, 2022 and ended on April 30th, 2023. Reporting on the Phase 1 wildlife monitoring program was submitted May 7, 2024. This report is out for public comment until June 19, 2024. It is noted in several sections of the report that data are missing and wildlife observations that can be used to understand wildlife use around the road and inform adaptive management have not been consistently recorded. A draft of the Phase 2 Wildlife Management and Monitoring Plan was submitted July 4, 2023 and PCA provided comments to NorZinc September 1, 2023. NorZinc has not formally submitted the Phase 2 Wildlife Management and Monitoring Plan. PCA has

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
			had meetings with NorZinc to inform them on information requirements of the plan. A letter was sent to NorZinc on February 9, 2024, to clarify outstanding baseline data requirements.
Chapter 6. Wildlife and Wildlife Habita	**Measure 6-3 Reducing the risk of vehicle collisions with wildlife**		
	6-3: Reducing the risk of vehicle collisions with wildlife In order to reduce the likelihood of significant impacts on wildlife from collisions with vehicles along the road, the developer will identify and communicate wildlife caution zones to road users. The details of this approach will be incorporated into the developer's WMMP (referred to in Measure 6-2) and will include: a) a description of how wildlife information from drivers will be collected and recorded to inform the selection of wildlife crossing areas; b) a detailed system for identifying wildlife (specifically big game as defined in the Wildlife Act) caution zones and marking them along the road (such as where sightings or collisions have occurred or where Traditional Knowledge identifies trails); c) use of a remote camera trap system to identify wildlife road crossing areas and identify non-mine related traffic; d) annual reporting of wildlife sightings by drivers that includes vehicle collisions with wildlife, locations of signage for wildlife caution zones and whether they were modified based on operational experience; e) annual reporting to regulators of remote camera log results, locations of primary wildlife crossings and how wildlife caution zones were modified based on monitoring results (if applicable); and, f) annual reporting to regulators on road use by non-mine vehicles using data from remote camera logs. The GNWT will regulate this measure on territorial lands and Parks Canada will regulate this measure within the NNPR. Reporting will be included in the WMMP annual report.	**NorZinc**	LUP Part C: 144. *Traffic Control Mitigation and Road Operations* and Maintenance Plan LUP Part C: 71. *Wildlife Management and Monitoring Plan (WMMP)* PCA approved NorZinc's Phase 1 Wildlife Management and Monitoring Plan on October 31st, 2022, conditional on three directives outlined in the approval letter. The WMMP includes sections that describe how to reduce the risk of vehicle collisions with wildlife. Phase 1 construction began on November 10th, 2022 and ended on April 30th, 2023. Reporting on the Phase 1 wildlife monitoring program was submitted May 7, 2024. This report is out for public comment until June 19, 2024. It is noted in several sections of the report that data are missing and wildlife observations that can be used to understand wildlife use around the road and inform adaptive management have not been consistently recorded.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
			A draft of the Phase 2 Wildlife Management and Monitoring Plan was submitted July 4, 2023 and PCA provided comments to NorZinc September 1, 2023. NorZinc has not formally submitted the Phase 2 Wildlife Management and Monitoring Plan. PCA has had meetings with NorZinc to inform them on information requirements of the plan. A letter was sent to NorZinc on February 9, 2024, to clarify outstanding baseline data requirements
Chapter 8. Water quality and quantity	**Measure 8-1: Water baseline data, mitigation, monitoring, and adaptive management**		
	8-1, Part 1: Introduction To ensure that the road and crossings are designed to an appropriate standard, and constructed and operated in a manner that will be protective of the environment, CanZinc will: i. collect additional baseline data; ii. identify and implement appropriate mitigation to prevent significant adverse impacts; iii. combine monitoring programs and plans to coordinate water monitoring efforts; and iv. incorporate principles of adaptive management into road and crossing design and monitoring. Parks Canada, Fisheries and Oceans Canada, and the Mackenzie Valley Land and Water Board will (within their respective jurisdictions) review and approve CanZinc's actions to ensure the requirements of this measure are satisfied.	**NorZinc**	WL Schedule 4: 5. *Water Monitoring Plan* Parks Canada approved NorZinc's Phase 1 Water Monitoring Plan on October 21, 2022. A draft of the Phase 2 Water Monitoring Plan was submitted October 30, 2023, and PCA provided comments to NorZinc November 11, 2023. NorZinc has not formally submitted the Phase 2 Water Monitoring Plan.
	8-1, Part 2: Baseline data CanZinc will collect baseline data necessary to enable the design, construction, and maintenance of watercourse crossings that are protective of the environment and inform future monitoring. CanZinc will install hydrometric stations and use the resulting data in its road and crossing designs. These stations will measure continuous streamflow data during the open water season and instantaneous flow measurements during the ice-covered period for a minimum of one year prior to construction of watercourse crossings. The stations will be established to: i. characterize spatial variability; ii. characterize variability in watershed size;	**NorZinc**	WL Schedule 4: 5. *Water Monitoring Plan* Parks Canada approved NorZinc's Phase 1 Water Monitoring Plan (WMP) on October 21, 2022. NorZinc installed 4 hydrometric stations in the area of the project, including one existing station at Prairie Creek (est. 2013), and three new stations at Sundog Creek (est. 2018), Tetcela River (est. 2018) and

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
	iii. measure conditions at Sundog Creek and other key locations (to be determined in consultation with regulators); and, iv. provide locations for ongoing monitoring during operations. A minimum of one year of this data will be collected prior to the start of activities related to construction of watercourse crossings, and data collection will continue into construction (see Measure 8-1 part 4). CanZinc will work with Parks Canada, Fisheries and Oceans Canada, and the Mackenzie Valley Land and Water Board to determine what, if any, other water baseline data is required prior to construction to inform mitigation, future monitoring, and adaptive management.		Grainger River (est. 2018). These stations are maintained by ECCC. With these stations, a minimum of one year of baseline data was collected prior to the start of Phase 1 construction, which began on November 10th, 2022 and ended on April 30th, 2023. A draft of the Phase 2 Water Monitoring Plan was submitted October 30, 2023 and PCA provided comments to NorZinc November 11, 2023. NorZinc has not formally submitted the Phase 2 Water Monitoring Plan.
	8-1, Part 3: Mitigate impacts on water quality CanZinc will use the baseline data collected, as well as any other relevant information and best management practices, to determine appropriate mitigation prior to construction and to revise detailed design plans for watercourse crossings. The developer will share the baseline data with all relevant regulatory authorities and the independent panel (Measure 5-1) to facilitate Project review, permitting, and licensing.	**NorZinc**	WL Schedule 4: 5. *Water Monitoring Plan* Parks Canada approved NorZinc's Phase 1 Water Monitoring Plan (WMP) on October 21, 2022. The WMP includes details on mitigations to reduce impacts on water quality. A draft of the Phase 2 Water Monitoring Plan was submitted October 30, 2023 and PCA provided comments to NorZinc November 11, 2023. NorZinc has not formally submitted the Phase 2 Water Monitoring Plan.
	8-1, Part 4: Monitoring CanZinc has identified many different plans, programs, and commitments for monitoring Project effects on water during construction and operation. CanZinc will amalgamate these plans, programs, and commitments, to the extent feasible and practical, so that water monitoring is consolidated and coordinated. The Review Board understands that for operational purposes, CanZinc may wish to keep certain aspects of water monitoring separate. The Review Board encourages the developer to consolidate where it can, in order to simplify the number of plans to create and report on. The Review Board	**NorZinc**	WL Schedule 4: 5. *Water Monitoring Plan* Parks Canada approved NorZinc's Phase 1 Water Monitoring Plan (WMP) on October 21, 2022. The WMP includes several water monitoring commitments. details on mitigations to reduce impacts on water quality.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
	considers that this may be relevant to the following commitments (Appendix C): #55, #93, #94, #211, #212, #217, #218, and #239, among others. Regarding ongoing monitoring at hydrometric stations, Parks Canada and the Mackenzie Valley Land and Water Board will review and approve monitoring plans, through the water licenses, and determine if and when ongoing monitoring can be phased out.		Phase 1 construction began on November 10th, 2022 and ended on April 30th, 2023. Reporting on water monitoring was provided in the Annual Report, which was submitted March 21, 2024. Public comments were provided by May 30, 2024. NorZinc will provide responses by July 19, 2024. It was noted in the report, both by NorZinc and by reviewers, that in multiple instances data were not collected as required, and therefore cannot be reported on as required in this measure. A draft of the Phase 2 Water Monitoring Plan was submitted October 30, 2023 and PCA provided comments to NorZinc November 11, 2023. NorZinc has not formally submitted the Phase 2 Water Monitoring Plan.
	8-1, Part 5: Adaptive management As part of the water monitoring program(s), CanZinc will establish and implement an adaptive management framework that satisfies the requirements of Appendix B. This will include thresholds and actions that will be developed and adapted using all available baseline information, effects monitoring results, and Traditional Knowledge and will consider ways to coordinate or compliment Aboriginal monitoring initiatives (see Measure 15-4).	**NorZinc**	WL Schedule 4: 5. *Water Monitoring Plan* Parks Canada approved NorZinc's Phase 1 Water Monitoring Plan (WMP) on October 21, 2022. The WMP includes adaptive management frameworks for Phase 1 construction and post-deactivation (Section 4.3) and for Phase 2 baseline and construction (Section 5.3). Reporting on water monitoring was provided in the Annual Report, which was submitted March 21, 2024. Public comments were provided by May 30, 2024. NorZinc will provide responses by July 19, 2024. It was noted in the report, both by NorZinc and by

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
			reviewers, that in multiple instances data were not collected as required, and therefore cannot be used to inform adaptive management. A draft of the Phase 2 Water Monitoring Plan was submitted October 30, 2023 and PCA provided comments to NorZinc November 11, 2023. NorZinc has not formally submitted the Phase 2 Water Monitoring Plan.
Chapter 9. Fish and Fish Habitat	**Measure 9-1: Effects mitigation, baseline data, management for the Sundog Creek diversion**		
	9-1 Part 1: Introduction In order to prevent significant adverse impacts on fish and fish habitat, CanZinc will design, construct and operate the Sundog Creek diversion channel in a way that is protective of fish and fish habitat and ensures the ecological and hydraulic effectiveness of the diversion. Toward this end, CanZinc will develop a Sundog Creek Diversion Plan to: a) Mitigate and minimize potential adverse effects on fish and fish habitat from the Sundog Creek diversion through appropriate and protective channel design, and by using all available best practices during construction and operation of the channel. b) Collect baseline data necessary to design, construct and maintain the diversion channel in a way that is protective of fish and fish habitat throughout the life of the Project. c) Monitor for project-related effects on physical and biological characteristics relevant to the maintenance of effective fish habitat and ecological integrity and to ensure that mitigations are operational and effective. d) Develop and implement an adaptive management framework for Project effects on fish and fish habitat and ecological integrity. Parks Canada and DFO must review and approve this plan prior to the start of construction.	**NorZinc**	The detailed design for Phase 1 did not include construction plans for Sundog Creek Diversion. Detailed design for Phase 2 has not yet been submitted by NorZinc. Phase 2 construction on the ASR has not started.
	9-1 Part 2: Collect baseline information	**NorZinc**	The detailed design for Phase 1 did not include construction plans for Sundog Creek Diversion.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
	CanZinc will collect baseline data necessary to design, construct and operate the Sundog Creek diversion so that fish and fish habitat are protected through the life of the Project. This baseline information will also be used to verify EA predictions and inform adaptive management. Prior to commencement of construction of the Sundog Creek diversion, CanZinc will collect a minimum of one year of baseline data for both hydrological and ecological characteristics, including at a minimum, information on: i. benthic invertebrates; ii. aquatic vegetation; iii. fish use and occupancy; iv. channel morphology; v. flow characteristics; vi. water quality; vii. hydrology (as described in Measure 8-1); and viii. any other variables of concern as deemed appropriate by DFO or Parks Canada.		Detailed design for Phase 2 has not yet been submitted by NorZinc. Phase 2 construction on the ASR has not started.
	9-1 Part 3: Mitigate or minimize potential adverse effects CanZinc will use all available best management practices and all available baseline data (including data requirements in measure 8-1 and 9-1) to design and construct the Sundog Creek diversion channel to avoid and mitigate adverse effects on fish and fish habitat, including both ecological and hydrological considerations.	**NorZinc**	The detailed design for Phase 1 did not include construction plans for Sundog Creek Diversion. Detailed design for Phase 2 has not yet been submitted by NorZinc. Phase 2 construction on the ASR has not started.
	9-1 Part 4: Monitor Project effects CanZinc will develop and implement a monitoring plan to detect project-related effects on fish and fish habitat from the Sundog Creek diversion. Monitoring must consider both hydrological and ecological characteristics including, at a minimum: i. benthic invertebrates; ii. aquatic vegetation; iii. fish use and occupancy; iv. channel morphology; v. flow characteristics; vi. water quality; vii. hydrology ; and	**NorZinc**	The detailed design for Phase 1 did not include construction plans for Sundog Creek Diversion. Detailed design for Phase 2 has not yet been submitted by NorZinc. Phase 2 construction on the ASR has not started.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
	viii. any other variables of concern as deemed appropriate by DFO or Parks Canada. Monitoring will consider both short and long-term effects of the diversion, and will incorporate appropriate flexibility such that monitoring requirements can be adjusted to reflect the Project stage, past monitoring results, and likely effects.		
	9-1, Part 5: Adaptive management of Project effects CanZinc will develop and implement an adaptive management framework for effects on fish and fish habitat from the Sundog Creek diversion that satisfies the requirements of Appendix B.	**NorZinc**	The detailed design for Phase 1 did not include construction plans for Sundog Creek Diversion. Detailed design for Phase 2 has not yet been submitted by NorZinc. Phase 2 construction on the ASR has not started.
Chapter 10. Culture and Heritage	**Measure 10-1: Traditional Knowledge**		
	10-1: Traditional Knowledge In order to prevent significant adverse impacts on heritage resources, and to support Traditional Knowledge requirements in other measures in this Report of EA, the developer will: i. engage with potentially-affected Aboriginal groups, including Nahanni Butte Dene Band, Łíídlı̨ Kų́ę́ First Nation, and Dehcho First Nations, about ways to avoid impacts from the Project, including impacts on heritage resources; ii. conduct this engagement prior to the Archaeological Impact Assessment (AIA), so that the resulting information can inform the AIA (see Measure 10-2); iii. thoroughly consider and, where applicable, incorporate Traditional Knowledge into Project design, mitigations, monitoring, and adaptive management; and iv. submit an updated engagement record and plan in accordance with Mackenzie Valley Land and Water Board (MVLWB) Engagement Guidelines for review and approval by Parks Canada and the MVLWB. The developer will do this in a culturally-appropriate way that respects applicable Traditional Knowledge policies and protocols.	**NorZinc**	WL Part B: 3. WL Part B: 4. LUP Part C:148. LUP Part C:149. Parks Canada approved NorZinc's Phase 1 Engagement Plan on February 23, 2022. Phase 1 construction began on November 10th, 2022, and was completed on April 30th, 2023. Phase 1 construction has been deactivated. Parks Canada approved NorZinc's Phase 2 Engagement Plan on November 3, 2023.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
	Measure 10-2: Archaeological Impact Assessment		
	10-2: Archaeological Impact Assessment In order to prevent significant adverse impacts on heritage resources, the developer will conduct an Archaeological Impact Assessment to the specifications detailed in commitments #215 and #216 in Appendix C of this Report. The Archaeological Impact Assessment will also: i. be developed in consultation with Parks Canada, the Government of the Northwest Territories, Nahanni Butte Dene Band, Łíídlıı Kų́ę́ First Nation, and Dehcho First Nations; ii. incorporate all evidence of place names, traditional land use, Traditional Knowledge, cultural and spiritual use, and harvesting in the vicinity of the Project; iii. be conducted along the final alignment of the All Season Road, at borrow site locations, and other areas where ground disturbance is proposed; and iv. be completed prior to any new ground disturbance.	**NorZinc**	LUP Part C: 80 *Archaeological Impact Assessment* Parks Canada approved NorZinc's Phase 1 Cultural Heritage Protection Plan on July 26, 2022. Draft reports and proposal for Phase 2 Archaeological Impact Assessment surveys and field work is currently under review. The Phase 2 Cultural Heritage Protection Plan was issued conditional approval on March 22, 2024.
Chapter 11. Rare plant assemblages, and harvested species	**Measure 11-1: Rare plant and rare plant assemblage baseline surveys and management in the Nahanni National Park Reserve**		
	11-1, Part 1: Baseline surveys In order to inform effective mitigations, adaptive management, and reclamation and to prevent significant adverse impacts on vegetation within Nahanni National Park Reserve, the developer will complete vegetation field surveys focused on the presence of rare plants and rare plant assemblages prior to ground disturbance or clearing within Nahanni National Park Reserve. Parks Canada will approve the details of these surveys, including timing, seasonality, and methods. CanZinc will use the results of the baseline surveys to inform the following: i. understanding impacts on rare plants and rare plant assemblages; ii. identifying appropriate mitigation to prevent significant adverse impacts; iii. monitoring and adaptive management; and iv. closure and reclamation. The results of the baseline surveys will be submitted to Parks Canada.	**NorZinc**	LUP Part C: 83 *Rare Plant Management Plan* LUP Part C: 84 *Rare Plant Management Plan* Parks Canada approved NorZinc's Phase 1 Rare Plant Management Plan on March 25, 2022. The Phase 2 Rare Plant Management Plan was issued conditional approval on March 22, 2024. The Phase 2 Rare Plant Management Plant outlines baseline surveys undertaken to date.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
	11-1, Part 2: Rare Plant Management Plan In order to prevent significant adverse impacts on rare plants as a result of construction and operation, CanZinc will develop a Rare Plant Management Plan prior to construction. This plan will include mitigation, monitoring, and adaptive management for rare plants. • Mitigation: CanZinc will use the information gathered in the surveys required by Measure 11-1 part 1, as well as any other relevant information, to identify appropriate mitigation within the plan to minimize significant adverse impacts on rare plants or rare plant assemblages. • Effects monitoring: The plan will include details on how rare plants will be identified and monitored during construction and operations activities. The plan will include effects monitoring for any identified rare plants or rare plant assemblages. • Adaptive management: The plan will include the principles of adaptive management outlined in Appendix B. This will include identifying the actions that will be taken if rare plants are identified at any time during construction and operation of the Project. The Rare Plant Management Plan will be reviewed and approved by Parks Canada prior to construction. The developer will operate in accordance with the approved plan.	**NorZinc**	LUP Part C: 83 *Rare Plant Management Plan* LUP Part C: 84 *Rare Plant Management Plan* Parks Canada approved NorZinc's Phase 1 Rare Plant Management Plan on March 25, 2022. Reporting on rare plant monitoring was provided in the Annual Report, which was submitted March 21, 2024. Public comments were provided by May 30, 2024. NorZinc will provide responses by July 19, 2024. The Phase 2 Rare Plant Management Plan was issued conditional approval on March 22, 2024. The Phase 2 Rare Plant Management Plant outlines baseline surveys undertaken to date.
	Measure 11-2: Invasive Species Management		
	11-2, Part 1: Introduction In order to reduce the likelihood of significant impacts on vegetation through the introduction or spread of invasive species, the developer will survey the right-of-way, mitigate the spread of invasive species, monitor for the presence of invasive species, and incorporate adaptive management, as described in the rest of this measure.	**NorZinc**	LUP Part C: 85 *Invasive Species Management Plan* LUP Part C: 86 *Invasive Species Management Plan* Parks Canada approved CZN's Phase 1 Invasive Species Management Plan on September 29, 2022. A draft of the Phase 2 Invasive Species Management Plan was submitted on September 9, 2023. PCA provided comments to NorZinc on October 13, 2023. NorZinc formally submitted the Phase 2 Invasive Species Management Plan on January 4, 2024. PCA

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
			indicated to NorZinc that the plan did not meet conformity on January 19, 2024.
	11-2, Part 2: Baseline CanZinc will survey the entire right-of-way for the presence of invasive species, prior to ground disturbance during construction, focusing on areas with higher likelihood for the establishment of invasive species. CanZinc will use the results of the surveys to inform Parts 3 and 4 of this measure.	**NorZinc**	LUP Part C: 85 *Invasive Species Management Plan* LUP Part C: 86 *Invasive Species Management Plan* Parks Canada approved CZN's Phase 1 Invasive Species Management Plan on September 29, 2022. Several invasive plant surveys were conducted, as documented in the Invasive Species Management Plan. These surveys concluded that no invasive plant species currently exist in NNPR. Reporting on invasive species monitoring was provided in the Annual Report, which was submitted March 21, 2024. Public comments were provided by May 30, 2024. NorZinc will provide responses by July 19, 2024. It was noted in the report, both by NorZinc and by reviewers, that in multiple instances data were not collected as required to fulfill reporting requirements. A draft of the Phase 2 Invasive Species Management Plan was submitted on September 9, 2023. PCA provided comments to NorZinc on October 13, 2023. NorZinc formally submitted the Phase 2 Invasive Species Management Plan on January 4, 2024. PCA indicated to NorZinc that the plan did not meet conformity on January 19, 2024.
	11-2, Part 3: Mitigation	**NorZinc**	LUP Part C: 85 *Invasive Species Management Plan* LUP Part C: 86 *Invasive Species Management Plan*

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
	CanZinc will mitigate the potential spread of invasive species by implementing the mitigations it has already identified (e.g., the wheel-wash station). CanZinc will work with the Government of Northwest Territories and Parks Canada to identify additional mitigation that will prevent the spread of invasive species.		Parks Canada approved CZN's Phase 1 Invasive Species Management Plan on September 29, 2022. The Phase 1 Invasive Species Management Plan outlines a list of mitigations for Phase 1, including a vehicle inspection station, and proper management of fill. During surveillance of Phase 1, Parks Canada did not observe any inspection or cleaning of equipment, as required in the Phase 1 Invasive Species Management Plan. A draft of the Phase 2 Invasive Species Management Plan was submitted on September 9, 2023. PCA provided comments to NorZinc on October 13, 2023. NorZinc formally submitted the Phase 2 Invasive Species Management Plan on January 4, 2024. PCA indicated to NorZinc that the plan did not meet conformity on January 19, 2024.
	11-2, Part 4: Invasive Species Management Plan CanZinc will revise the invasive species management framework and create an Invasive Species Management Plan prior to construction, considering off-site as well as on-site prevention and control. CanZinc will include the adaptive management principles set out in Appendix B within the invasive species management framework, the Invasive Species Management Plan, and any individual weed control plans, if or as they are developed. Prior to the commencement of construction, the Invasive Species Management Plan will be reviewed and approved by Parks Canada and the Mackenzie Valley Land and Water Board, with input from the Government of Northwest Territories where appropriate, as conditions in their respective land use permits. The developer will implement the approved plan(s).	**NorZinc**	LUP Part C: 85 *Invasive Species Management Plan* LUP Part C: 86 *Invasive Species Management Plan* Parks Canada approved CZN's Phase 1 Invasive Species Management Plan on September 29, 2022. A draft of the Phase 2 Invasive Species Management Plan was submitted on September 9, 2023. PCA provided comments to NorZinc on October 13, 2023. NorZinc formally submitted the Phase 2 Invasive Species Management Plan on January 4, 2024. PCA indicated to NorZinc that the plan did not meet conformity on January 19, 2024.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
Chapter 12. Permafrost	**Measure 12-1: Permafrost Management**		
	12-1, Part 1: Introduction In order to avoid permafrost degradation and prevent associated significant adverse impacts on the environment from the Project during construction, operations, closure, and post-closure, the developer will conduct additional permafrost investigations to inform design and construction of the Project and will develop and implement a permafrost management plan.	**NorZinc**	LUP Part C: 85 *Permafrost Management and Monitoring Plan* WL Part F 7. *Permafrost Management and Monitoring Plan* WL Schedule 4 (2). *Permafrost Management and Monitoring Plan* Parks Canada approved NorZinc's Phase 1 Permafrost Management Plan (PMP) on July 15, 2022. A draft of the Phase 2 Permafrost Management Plan was submitted on November 24, 2023. PCA provided comments to NorZinc on December 13, 2023. NorZinc has not yet formally submitted the Permafrost Management Plan for approval.
	12-1, Part 2: Permafrost investigations The developer will investigate permafrost and collect baseline permafrost data for the road alignment and borrow pits, provide the data and results to the independent technical review panel and to regulators, and use the information and results to inform detailed and final design.	**NorZinc**	LUP Part C: 85 *Permafrost Management and Monitoring Plan* WL Part F 7. *Permafrost Management and Monitoring Plan* WL Schedule 4 (2). *Permafrost Management and Monitoring Plan* *Techincal Panel* WL Part E: 6. WL Part E: 7. WL Part E: 12. LUP Part C: 27. LUP Part C: 32. Parks Canada approved NorZinc's Phase 1 Permafrost Management Plan (PMP) on July 15, 2022. The Phase 1 PMP summarizes permafrost data collected to date along the winter road alignment. In

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
			addition, ground temperature monitoring devices were installed as part of the Phase 1 Geotechnical and Geophysical investigations. The report was submitted July 27, 2023, however it was missing some required information including the final number of test pits and boreholes, photos of before/after drilling at each location, the number and location of any drilling mud sumps, and photos showing the mud sumps. Reporting on permafrost was provided in the Annual Report, which was submitted March 21, 2024. Public comments were provided by May 30, 2024. NorZinc will provide responses by July 19, 2024. It was noted in the report, both by NorZinc and by reviewers, that in multiple instances data were not collected as required to fulfill reporting requirements. A draft of the Phase 2 Permafrost Management Plan was submitted on November 24, 2023. PCA provided comments to NorZinc on December 13, 2023. NorZinc has not yet formally submitted the Permafrost Management Plan for approval.
	12-1, Part 3: Design and construction of the Project CanZinc will design and construct the road, borrow pits, and other infrastructure in a way that anticipates and avoids permafrost degradation and associated impacts on the surrounding environment during all phases of the Project, including post-closure.	**NorZinc**	LUP Part C: 85 *Permafrost Management and Monitoring Plan* WL Part F 7. *Permafrost Management and Monitoring Plan* WL Schedule 4 (2). *Permafrost Management and Monitoring Plan* *Techincal Panel* WL Part E: 6. WL Part E: 7. WL Part E: 12. LUP Part C: 27. LUP Part C: 32.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
			Parks Canada approved NorZinc's Phase 1 Permafrost Management Plan (PMP) on July 15, 2022. The Phase 1 Design and Construction Plan was reviewed by the Independent Technical Review Panel and accepted in a letter dated 13 December 2021. Phase 1 construction began on November 10th, 2022, and was completed on April 30th, 2023. Phase 1 construction has been deactivated. A draft of the Phase 2 Permafrost Management Plan was submitted on November 24, 2023. PCA provided comments to NorZinc on December 13, 2023. NorZinc has not yet formally submitted the Permafrost Management Plan for approval. A draft of the Phase 2 Design and Construction Plan was submitted on October 5, 2023. PCA provided comments to NorZinc on November 27, 2023. NorZinc has not yet formally submitted the Design and Construction Plan for approval.
	12-1, Part 4: Permafrost Management Plan The developer will establish and implement a Permafrost Management Plan that includes permafrost monitoring and adaptive management. The Permafrost Management Plan must include: • monitoring to measure the effects of the Project on permafrost (with an emphasis on early detection of any changes in permafrost) and evaluate the effectiveness of Project design and mitigations in preventing or minimizing permafrost degradation; and, • an adaptive management framework that satisfies the requirements of Appendix B.	**NorZinc**	LUP Part C: 85 *Permafrost Management and Monitoring Plan* WL Part F 7. *Permafrost Management and Monitoring Plan* WL Schedule 4 (2). *Permafrost Management and Monitoring Plan* Parks Canada approved NorZinc's Phase 1 Permafrost Management Plan (PMP) on July 15, 2022.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
	The Permafrost Management Plan will be for review and approval by the Mackenzie Valley Land and Water Board and Parks Canada.		A draft of the Phase 2 Permafrost Management Plan was submitted on November 24, 2023. PCA provided comments to NorZinc on December 13, 2023. NorZinc has not yet formally submitted the Permafrost Management Plan for approval. Reporting on permafrost was provided in the Annual Report, which was submitted March 21, 2024. Public comments were provided by May 30, 2024. NorZinc will provide responses by July 19, 2024. It was noted in the report, both by NorZinc and by reviewers, that in multiple instances data were not collected as required to fulfill reporting requirements.
Chapter 15. Follow -up	**Measure 15-1: Monitoring by the Developer**		
	15-1, Part 1: Objectives In order to ensure that the measures the developer is responsible for are fully and effectively implemented and to inform adaptive management throughout all phases of the development, the developer will establish and implement monitoring programs that fulfill the following objectives: i. to measure the effects of the Project on the environment; ii. to assess the implementation and effectiveness of the measures in this Report of EA for preventing or minimizing impacts on the environment; iii. to inform the implementation of the adaptive management frameworks required by measures in this Report of EA, so that mitigation can be adjusted to ensure significant adverse impacts do not occur; iv. to assess the accuracy of the developer's predictions made during the environmental assessment, regarding the impacts of the Project on the environment; and v. where applicable, to provide relevant data and information to support other monitoring initiatives (such as Aboriginal monitoring initiatives and government monitoring).	**NorZinc**	Extensive requirements captured throughout WL and LUP and in several related management plans. The Phase 1 management plans were reviewed and approved by PCA throughout 2022-2023. All Phase 1 management plans have been approved by PCA. Each Phase 1 management plan outlines any mitigations or monitoring that are required, including adaptive management. The Annual Report was submitted March 21, 2024. Public comments were provided by May 30, 2024. NorZinc will provide responses by July 19, 2024. It was noted in the report, both by NorZinc and by reviewers, that in multiple instances data were not collected as required to fulfill reporting requirements.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
	These objectives must be incorporated into all monitoring programs that are identified in measures in this Report of EA, either by revising existing programs or creating new programs.		The Phase 2 management plans review is ongoing. Drafts of most plans have been provided to PCA, except for: • Borrow Source Optimization Report, • Closure and Reclamation Plan and • Fish and Fish Habitat Protection Plan. Formal submissions of the: • Avalanche Hazard Plan, • Contaminant loading Management Plan, • Cultural Heritage Protection Plan, • Engagement Plan, Explosives Management Plan, • Geochemical Verification Plan, • Invasive Species Management Plan, • Rare Plant Management Plan, and • Traffic Control Plan has occurred. Of these plans, only the: • Engagement, • Explosives, • Cultural Heritage Protection, • Rare Plant and • Traffic Management Plans have met conformity. The Engagement Plan is the only plan with approval to date, although Cultural Heritage Protection and Rare Plants have been provided conditional approval once directives are addressed. Traffic Management Plan was out for public comment, which ended May 28, 2024 and NorZinc provided their response on June 13, 2024. PCA is in the process of reviewing all submitted comments and responses.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
	15-1, Part 2: Traditional knowledge and inclusion of Aboriginal groups The developer will engage and consider the advice of Nahanni Butte Dene Band, Łíídlıį Kų́ę́ First Nation, and Dehcho First Nations, and consider all available Traditional Knowledge when developing its monitoring programs. To the extent possible, the developer will involve potentially-affected Aboriginal groups, including Nahanni Butte Dene Band, Łíídlıį Kų́ę́ First Nation, and Dehcho First Nations, in the implementation of the developer's monitoring programs.	**NorZinc**	WL Part B: 3. WL Part B: 4. LUP Part C: 148. LUP Part C: 149. WL Part B : 20. *Engagement Plan* WL Part B : 21. *Engagement Plan* LUP Part C: 130. *Engagement Plan* LUP Part C: 131. *Engagement Plan* Parks Canada approved CZN's Phase 1 Engagement Plan on February 23, 2022. Phase 1 construction began on November 10th, 2022, and was completed on April 30th, 2023. Phase 1 construction has been deactivated. The Phase 2 Engagement Plan was approved by Parks Canada on November 3, 2023. Through the Annual Report, NorZinc provided some details on how Traditional Knowledge has been incorporated into operations and planning. PCA asked for further details in their comments as it is unclear the extent that Nahanni Butte Dene Band, Łíídlıį Kų́ę́ First Nation, and Dehcho First Nations were engaged to include TK in management plans and if or how TK actually informed the plans. NorZinc will provide responses to PCAs question by July 19, 2024.
	Measure 15-2: Annual reporting from the developer		

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date

EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2024 Detail on Measure Progress
	15-2: Annual reporting from the developer In order to demonstrate how measures are being implemented and to evaluate the effectiveness of the developer's efforts to prevent or minimize impacts on the environment, the developer will, throughout all phases of the development, prepare an annual Report on the Implementation of Measures. The Report will address the measures that the developer is responsible for and will: i. Describe the actions, including actions implemented through adaptive management, being undertaken to implement the measures. ii. Evaluate how effective the implementation actions are in controlling, reducing, or eliminating the impact (considering the results of monitoring programs and adaptive management frameworks). Where applicable, provide references to further information contained in other management plans or monitoring reports. The developer will provide a copy of this annual report to the Review Board by June 30 of each year, following the commencement of construction of the Project. The developer will also report in person annually, in a culturally appropriate way, to Nahanni Butte Dene Band, Łíídlıı̨ Kų́ę́ First Nation, and Dehcho First Nations.	**NorZinc**	Phase 1 construction began on November 10th, 2022, and was completed on April 30th, 2023. Phase 1 construction has been deactivated. The annual report was submitted March 21, 2024. Public comments were provided by May 30, 2024. NorZinc will provide responses by July 19, 2024. It was noted in the report, both by NorZinc and by reviewers, that in multiple instances data were not collected as required to fulfill reporting requirements.
	Measure 15-3: Annual reporting from government and regulatory authorities		
	15-3: Annual reporting from government and regulatory authorities In order to evaluate the effectiveness of mitigation measures for the protection of the environment, each regulatory authority or government that is wholly or partly responsible for implementation of any measure in this Report of EA will prepare an annual Report on Implementation of Measures. The Report will: a. describe the actions being undertaken to implement the measures or the part(s) of the measures for which the regulatory authority or government is responsible; and b. explain how these actions, including those implemented through adaptive management, fulfill the intent of the EA measures, including consideration of the following questions: i. How are implementation actions addressing a likely significant adverse impact on the environment?	**PCA**	As represented in this table.

Table 1. PCA summary of actions undertaken to achieve the intent of EA measures and assessment of their effectiveness to date			
EA1415-01 Report of EA Chapter Reference	**Text of Measure**	**Party Responsible**	**2024 Detail on Measure Progress**
	ii. How effective are implementation actions at reducing, controlling, or eliminating the impact or its likelihood? Government and regulators will provide a copy of this annual report to the Review Board by June 30 of each year.		
	Measure 15-4: Support Aboriginal monitoring initiatives		
	15-4: Support Aboriginal monitoring initiatives To help prevent significant adverse impacts on the environment and on Aboriginal rights, the developer will support, to the greatest extent practicable, independent monitoring of the Project area through monitoring initiatives undertaken by Nahanni Butte Dene Band, Łíídlıı Kų́ę́ First Nation, and Dehcho First Nations. The developer will provide access to the All Season Road for these Aboriginal groups to conduct their monitoring activities throughout all phases of the Project, whenever it is safe to do so. The developer will also provide in-kind support for independent community monitors to conduct their monitoring activities (e.g., accommodations, meals, transportation and appropriate safety training to operate on the road).	**NorZinc & IGO Monitors**	WL Part B: 3. WL Part B: 4. LUP Part C: 148. LUP Part C: 149. WL Part B : 20. *Engagement Plan* WL Part B : 21. *Engagement Plan* LUP Part C: 130. *Engagement Plan* LUP Part C: 131. *Engagement Plan* Parks Canada approved NorZinc's Phase 1 Engagement Plan on February 23, 2022. Phase 1 construction began on November 10th, 2022, and was completed on April 30th, 2023. Phase 1 construction has been deactivated. The Phase 2 Engagement Plan was approved by Parks Canada on November 3, 2023.