Parks Canada Parcs Canada

June 30, 2025

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 2025 Annual Report for EA1415-01:

Parks Canada Agency is submitting *Implementation of the Canadian Zinc Corporation All-Season Road Environmental Assessment Measures– PCA 2025 Annual Report for EA1415-01*, for the period of July 1, 2024 to June 30, 2025. 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.

PCA will submit a report each year for the duration of this project. 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.

PCA will continue to take a coordinated approach and work with resource management boards, GNWT, NorZinc Ltd., and other parties to the Prairie Creek All Season Road Environmental Assessment (EA 1415-01) on measure implementation and reporting. Please contact Audrey Steedman at audrey.steedman@pc.gc.ca with any questions or concerns regarding this letter and the attached report.

Sincerely,

Jennifer Carpenter
Site Superintendent
Nahanni National Park Reserve
PO Box 348
Fort Simpson NT X0E 0N0
Parks Canada

Implementation of the Canadian Zinc Corporation All-Season Road Environmental Assessment Measures– PCA 2025

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. The reporting period is July 1, 2024 to June 30, 2025. 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. The Type B Water License PC2014L8-0006 was replaced by Type A Water License PC2023L8-0002 in July 2024, mid-way through the reporting period. 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 due annually on March 31. Permitting activities for Phase 2 are 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	2025 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	**NorZinc**	Type B WL Part E: 6. WL Part E: 7. WL Part E: 12. LUP Part C: 27. LUP Part C: 32.

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EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2025 Detail on Measure Progress
	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.		Type A WL Part E: 16, 17. 18, 19 & 20. 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 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. Type A WL Part E: 16, 17. 18, 19 & 20. 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	**NorZinc**	Panel is established Approved panel composition (March 2021): Timothy Smith • J.M. (Jim) Owell • Robert E. Johnson • Lee Deslauriers

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	Land and Water Board, the Government of the Northwest Territories, Nahanni Butte Dene Band, Łíídlıı̨ Kų́ę́ First Nation, and Dehcho First Nations on 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, Łíídlıı̨ 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.	**NorZinc**	Type B WL Part E: 6. WL Part E: 7. WL Part E: 12. LUP Part C: 27. LUP Part C: 32. Type A WL Part E: 16, 17. 18, 19 & 20. 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	2025 Detail on Measure Progress
	iv. During construction: • 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. The Phase 2 management plans review is ongoing. See Table 2 for the status of each Phase 2 management plan.
	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	**NorZinc**	LUP Part C: 144 *Traffic Control Mitigation and Road Operations*

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EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2025 Detail on Measure Progress
	closure]) as well as seasonal or weather related closure. This plan will replace Section 7.1 of the Road Operations Plan. 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.		PCA approved NorZinc's Phase 1 Traffic Control Mitigation and Road Operations and Maintenance Plan on October 21st, 2022. 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. On October 30, 2024 PCA issued a letter to confirm that the plan is conditionally approved. Specific revisions and resubmission are required.
	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,	**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. On October 30, 2024 PCA issued a letter to confirm that the

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EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2025 Detail on Measure Progress
	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.		plan is conditionally approved. Specific revisions and resubmission are required.. PCA approved NorZinc's Phase 1 Wildlife Management and Monitoring Plan on October 31st, 2022. For details related to wildlife and the Wildlife Management and Monitoring Plan, see reporting on Measure 6-1.
Chapter 6. Wildlife and Wildlife Habitat	**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 is due annually on March 31 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

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	2025 Detail on Measure Progress
			outline the 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; 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.	**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 outline the 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:	**NorZinc**	LUP Part C: 71. *Wildlife Management and Monitoring Plan (WMMP)*

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	2025 Detail on Measure Progress
	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.		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 is due annually on March 31. 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 outline the 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 Habitat	**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

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EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2025 Detail on Measure Progress
	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 outline information requirements of the plan. A letter was sent to NorZinc on February 9, 2024, to clarify outstanding baseline data requirements.
	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.

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**	**2025 Detail on Measure Progress**
			Reporting on the Phase 1 wildlife monitoring program is due annually on March 31. 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 outline the 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 Habitat	**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,	**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 is due annually on March 31.

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	2025 Detail on Measure Progress
	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.		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 outline the 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**	Type B WL Schedule 4: 5. *Water Monitoring Plan* Type A WL Schedule 4: 5. *Water Management 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**	Type B WL Schedule 4: 5. Water Monitoring Plan Type A WL Schedule 4: 5. Water Management 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),

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EA1415-01 Report of EA Chapter Reference	Text of Measure	Party Responsible	2025 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.		Tetcela River (est. 2018) and 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**	Type B WL Schedule 4: 5. Water Monitoring Plan Type A WL Schedule 4: 5. Water Management 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	**NorZinc**	Type B WL Schedule 4: 5. Water Monitoring Plan Type A WL Schedule 4: 5. Water Management 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	2025 Detail on Measure Progress
	of plans to create and report on. The Review Board 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 the implementation of the Water Monitoring Plan, is required in the annual report, due March 31st annually. 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**	Type B WL Schedule 4: 5. Water Monitoring Plan Type A WL Schedule 4: 5. Water Management 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 the implementation of the Water Monitoring Plan, is required in the annual report, due March 31st annually. 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.

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	2025 Detail on Measure Progress
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.
	9-1 Part 2: Collect baseline information 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;	**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.

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	2025 Detail on Measure Progress
	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.		
	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.
	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 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.	**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.
	9-1, Part 5: Adaptive management of Project effects	**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	2025 Detail on Measure Progress
	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.		Detailed design for Phase 2 has not yet been submitted by NorZinc.
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, Łíídlıı Kúé 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**	Type B WL Part B: 3. Type B WL Part B: 4. LUP Part C:148. LUP Part C:149. Type A WL Part B: 3 Type A WL Part B: 4 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. In a letter dated October 30, 2024 to NorZinc, Parks Canada noted that both the Water Licence PC2023L8-0006 and Land Use Permit PC2014F0013 contain multiple requirements for the consideration of Traditional Knowledge informing the Management Plans. The letter also notes that the Licensee is required to make a reasonable effort to consider and incorporate any Traditional Knowledge that is made available to them. It is expected that Canadian Zinc clearly identifies what reasonable effort

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	2025 Detail on Measure Progress
			was made to obtain Traditional Knowledge and if any recommendations based on Traditional Knowledge were received and if so, how they were incorporated into the submission.
	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, Łíídlı̨ 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 contributing to the Phase 2 Archaeological Impact Assessment requirements are under review. A proposal for field work in 2025 is under review. The Phase 2 Cultural Heritage Protection Plan was issued conditional approval on March 22, 2024, and was resubmitted June 14, 2024, meeting the conditions.
Chapter 11. Rare plant assemblages, and harvested specie	**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;	**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, and was resubmitted June 17, 2024, meeting the conditions. The

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	2025 Detail on Measure Progress
	iii. monitoring and adaptive management; and iv. closure and reclamation. The results of the baseline surveys will be submitted to Parks Canada.		Phase 2 Rare Plant Management Plan outlines baseline surveys undertaken to date.
	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 the implementation of the Rare Plant Management Plan is required in annual reporting, due March 31st, annually. The Phase 2 Rare Plant Management Plan was issued conditional approval on March 22, 2024, and was resubmitted June 17, 2024, meeting the conditions. 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.

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	2025 Detail on Measure Progress
			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. On September 26, 2024, Canadian Zinc Corporation submitted to Parks Canada the Phase 2 Invasive Species Management Plan, Version 3.0. The public review period for the plan occurred between October 4, 2024 and November 6, 2024. Canadian Zinc provided responses to comments on December 17, 2024. Parks Canada reviewed all comments and Canadian Zinc's responses. The Nahʔą Dehé Consensus Team met on April 23, 2025, and considered the Invasive Species Management Plan, Version 3.0. On April 28, 2025 , Parks Canada issued a decision that the Invasive Species Management Plan, Version 3 was not approved, and requires resubmission subject to directives.
	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.

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	2025 Detail on Measure Progress
			Reporting on the implementation of the Invasive Species Management Plan is required in annual reporting, due March 31st annually. The Phase 2 Invasive Species Management Plan is not approved (see details on regulatory process above).
	11-2, Part 3: Mitigation 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.	**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. 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. The Phase 2 Invasive Species Management Plan is not approved (see details on regulatory process above).
	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	**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. The Phase 2 Invasive Species Management Plan is not approved (see details on regulatory process above).

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	2025 Detail on Measure Progress
	Territories where appropriate, as conditions in their respective land use permits. The developer will implement the approved plan(s).		
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* Type B WL Part F 7. *Permafrost Management and Monitoring Plan* WL Schedule 4 (2). *Permafrost Management and Monitoring Plan* Type A WL Part F: 4 *Permafrost Management and Monitoring Plan* Schedule 5(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* Type B WL Part F 7. *Permafrost Management and Monitoring Plan* WL Schedule 4 (2). *Permafrost Management and Monitoring Plan* Type A WL Part F: 4 *Permafrost Management and Monitoring 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	2025 Detail on Measure Progress
			Schedule 5(2) *Permafrost Management and Monitoring Plan* *Techincal Panel* Type B WL Part E: 6. WL Part E: 7. WL Part E: 12. LUP Part C: 27. LUP Part C: 32. Type A WL Part E: 16, 17. 18, 19 & 20. 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 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 the implementation of the Permafrost Management Plan is required in annual reporting, due, March 31st, annually. 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 formally submitted the Permafrost Management Plan for approval.
	12-1, Part 3: Design and construction of the Project	**NorZinc**	LUP Part C: 85 *Permafrost Management and Monitoring 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	2025 Detail on Measure Progress
	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.		Type B WL Part F 7. *Permafrost Management and Monitoring Plan* WL Schedule 4 (2). *Permafrost Management and Monitoring Plan* Type A WL Part F: 4 *Permafrost Management and Monitoring Plan* Schedule 5(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. Type A WL Part E: 16, 17. 18, 19 & 20. 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.

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	2025 Detail on Measure Progress
			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. The Permafrost Management Plan will be for review and approval by the Mackenzie Valley Land and Water Board and Parks Canada.	**NorZinc**	LUP Part C: 85 *Permafrost Management and Monitoring Plan* Type B WL Part F 7. *Permafrost Management and Monitoring Plan* WL Schedule 4 (2). *Permafrost Management and Monitoring Plan* Type A WL Part F: 4 *Permafrost Management and Monitoring Plan* Schedule 5(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. Reporting on the implementation of the Permafrost Management Plan is required in annual reporting, due March 31st annually.
Chapter 15. Follow -up	**Measure 15-1: Monitoring by the Developer**		
	15-1, Part 1: Objectives	**NorZinc**	Extensive requirements captured throughout WL and LUP and in several related management plans.

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	2025 Detail on Measure Progress
	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). 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 1 management plans were reviewed and approved by PCA throughout 2022-2023. Each Phase 1 management plan outlines any mitigations or monitoring that are required, including adaptive management. Reporting on monitoring that is part of implementing of management plans is required in annual reporting, due by March 31st annually. The Phase 2 management plans review is ongoing. See Table 2 for the status of each Phase 2 management plan.
	15-1, Part 2: Traditional knowledge and inclusion of Aboriginal groups The developer will engage and consider the advice of Nahanni Butte Dene Band, Łíídlıı 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, Łíídlıı Kų́ę́ First Nation, and Dehcho First Nations, in the implementation of the developer's monitoring programs.	**NorZinc**	Type B WL Part B: 3. WL Part B: 4. LUP Part C: 148. LUP Part C: 149. Type B WL Part B : 20. *Engagement Plan* WL Part B : 21. *Engagement Plan* LUP Part C: 130. *Engagement Plan* LUP Part C: 131. *Engagement Plan* Type A WL Part B: 3 & 4. Type A WL Part B: 21

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**	**2025 Detail on Measure Progress**
			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. NorZinc is required to report on how Traditional Knowledge was considered in decision making in annual reporting, due March 31st annually.
	Measure 15-2: Annual reporting from the developer		
	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.	**NorZinc**	Measure is not directed to Parks Canada.

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	2025 Detail on Measure Progress
	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.		
	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? 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.	**PCA**	As represented in this table.
	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, Łíídlıı̨ 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**	Type B WL Part B: 3. WL Part B: 4. LUP Part C: 148. LUP Part C: 149. Type B WL Part B : 20. *Engagement Plan* WL Part B : 21. *Engagement Plan* LUP Part C: 130. *Engagement Plan* LUP Part C: 131. *Engagement 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**	**2025 Detail on Measure Progress**
			Type A WL Part B: 3 & 4. Type A WL Part B: 21. 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.

Table 2: Phase 2 Management Plan Status

	Phase 2 Management Plans	DRAFT SUBMISSION RECEIVED?	FORMAL SUBMISSION RECEIVED?	CONFORMITY CHECK PASSED?	PUBLIC REVIEW COMPLETED?	APPROVAL OF PLAN BY PARKS CANADA?
1.	Avalanche Hazard MP	✓	✓	X		
2.	Borrow Pit MP	✓				
3.	Borrow Source Optimization Report					
4.	Closure and Reclamation Plan					
5.	Contaminant Loading MP	✓	✓	X		
6.	Cultural Heritage Protection Plan	✓	✓	✓	✓	✓
7.	Design and Construction Plan	✓				
8.	Engagement Plan	✓	✓	✓	✓	✓
9.	Explosives MP	✓	✓	✓	✓	X
10.	Fish and Fish Habitat Protection Plan					
11.	Geochemical Verification Program	✓	✓	X		
12.	Invasive Species Management Plan	✓	✓	✓	✓	X
13.	Permafrost Management and Monitoring Plan	✓				
14.	Rare Plant Management Plan	✓	✓	✓	✓	✓

	Phase 2 Management Plans	DRAFT SUBMISSION RECEIVED?	FORMAL SUBMISSION RECEIVED?	CONFORMITY CHECK PASSED?	PUBLIC REVIEW COMPLETED?	APPROVAL OF PLAN BY PARKS CANADA?
15.	Sediment and Erosion Control Plan	✓				
16.	Spill Contingency Plan and Emergency Response Plan	✓				
17.	Traffic Control Mitigation and Road Operations and Maintenance Plan	✓	✓	✓	✓	✓ Conditional
18.	Waste Management Plan	✓				
19.	Water Monitoring Plan	✓				
20.	Wildlife Management and Monitoring Plan	✓				