

**Federal Authority Advice Record (FAAR)****FAAR Response must be submitted by August 22, 2025**

Yellowhead Copper Project – Taseko Mines Limited (proponent)

Registry File: 89694

**Please complete the following:**

Department/Agency	Fisheries and Oceans Canada
Lead Contact	Ian Matchett
Full Address	401 Burrard Street, Vancouver BC, V6C 3S4
Email	<a href="mailto:Ian.Matchett@dfo-mpo.gc.ca">Ian.Matchett@dfo-mpo.gc.ca</a>
Telephone	236-334-9307
Alternate Contact	Rich McCleary <a href="mailto:Rich.McCleary@dfo-mpo.gc.ca">Rich.McCleary@dfo-mpo.gc.ca</a> 250-299-6071

1. Will your department or agency exercise a **power, perform a duty or function**, or provide **financial assistance**, related to the project to enable it to be carried out in whole or in part?

**Yes.**

As relevant,

- a) Specify the power, duty or function, or financial assistance, and the likelihood that it will be required to construct the project, based on the Initial Project Description, as either Required, Potential, Likely, Unlikely or Not Required

Authorization under Section 34.4(2)(b) and 35(2)(b) of the *Fisheries Act* may potentially be required for works, undertakings or activities that would result in death of fish or harmful alteration, disruption, or destruction (HADD) of fish habitat. A *Fisheries Act* Authorization may potentially be required for works such as the construction, operation, and closure of the open pit and Tailings Storage Facility and water management activities throughout all project phases.

- b) Describe any associated Indigenous or public consultation, including timelines

If a *Fisheries Act* Authorization is required, consultation with Indigenous groups whose Aboriginal or treaty rights may be adversely affected by the project will be needed. This consultation does not have a mandated timeline.

- c) Describe any associated information requirements (e.g., alternative means assessment, habitat offsetting), and specify those that may be coordinated with the impact assessment process, if an impact assessment is required

If a *Fisheries Act* Authorization is required, a comprehensive offsetting plan that adequately counterbalances harmful impacts to fish and fish habitat must be submitted as part of an application for authorization.

- d) Identify any associated project-specific guidance or issues of which the proponent should be aware, or information the proponent should provide.

n/a

2. **Using Table 1**, identify project- and context- specific **key issues**, based on the expertise within your mandate<sup>1</sup> and the information in your possession, including the Initial Project Description, any exchanges with the proponent or others related to the project and known means to address the effects of the project. For each key issue:
- a) Specify the key issue (e.g., specific species and location)
  - b) Specify the project component or activity linked to the key issue
  - c) Explain why it's a key issue based on:
    - i. biophysical effect pathway(s) from the specific project component or activity
    - ii. concern unique to the project or a priority within your mandate
    - iii. the issue being material<sup>2</sup> to decision making under the *Impact Assessment Act*
  - d) Identify how the issue could be resolved, including through means other than an impact assessment
  - e) Identify additional information the proponent could provide including to give confidence on how the issue can be addressed through other means.

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Dave Carter  
Regional Manger Fish and Fish  
Habitat Protection

August 15, 2025  
Date

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<sup>1</sup> Refer to the [Memoranda of Understanding with IAAC](#).

<sup>2</sup> An issue is material to decision making if its analysis is anticipated to affect the conclusions on (1) whether adverse effects within federal jurisdiction or direct and incidental adverse effects (collectively adverse federal effects) are likely not significant, or of low, medium or high significance; (2) appropriate mitigation measures for significant adverse federal effects; or (3) justification in the public interest.

**Table 1: Key Issues to inform the impact assessment process**

This table should outline key issues to inform the impact assessment process, including whether an impact assessment is required and, if so, the scope of the assessment and tailoring of the Tailored Impact Statement Guidelines/Application Information Requirements in a substituted assessment.

Key issues are the major concerns directly related to a project component or activity, the analysis of which is anticipated to be material to decision-making under the *Impact Assessment Act*. Federal authorities' advice should be guided by the identification and resolution of key issues. If an impact assessment is required, it will be focused on key issues.

Comment ID	a) Key issue	Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
<p><i>Identify comments by organization and comment number.</i></p> <p><i>e.g.: IAAC-01</i></p>	<p><i>Specify the key issue (e.g., specific species and location).</i></p>	<p><i>Identify the project component or activity linked to the key issue.</i></p> <p><i>Be specific about the nature, scale, novelty and complexity or the component or activity.</i></p>	<p><i>Identify the specific biophysical effect pathway between the project component or activity and the affected environmental or human receptor (including Indigenous Peoples).</i></p>	<p><i>Describe why it's a key issue within the mandate of your department or agency, including in terms of priorities of the federal government and in terms of anticipated likelihood, severity or uncertainty of effects.</i></p> <p><i>Identify if the key issue is common for projects of this nature or in this sector, or whether it's unique to this project due to its complexity, size or novelty; a sensitive or rare receiving environment; and/or proximity of sensitive environmental or human receptors (including Indigenous Peoples).</i></p>	<p><i>Describe why the key issue is material to decision-making as either:</i></p> <ul style="list-style-type: none"> <li>• <i>an adverse effect within federal jurisdiction, or a direct or incidental adverse effect, that may be significant based on available evidence including:</i> <ul style="list-style-type: none"> <li>○ <i>federal experts' knowledge and experience with past project assessments;</i></li> <li>○ <i>presence of sensitive species, habitats or human receptors (including Indigenous Peoples);</i></li> <li>○ <i>novel or complex project activities, components or technologies;</i></li> <li>○ <i>high uncertainties in effects or in the effectiveness of mitigation measures;</i></li> <li>○ <i>unknown or unproven mitigation; or</i></li> </ul> </li> <li>• <i>a factor for the justification in the public interest anticipated to be material to decision-making such as a likely positive effect contributing to sustainability, to Canada's environmental obligations or climate change commitments or in supporting governmental priorities, such as reconciliation with Indigenous Peoples.</i></li> </ul>	<p><i>Describe how the key issue could be resolved or addressed by:</i></p> <ul style="list-style-type: none"> <li>• <i>Any means, including powers, duties, functions, frameworks, policies or guidance that your department or agency has;</i></li> <li>• <i>Any means, including powers, duties, functions, frameworks, policies or guidance from another jurisdiction, including the province;</i></li> <li>• <i>Common, proven, well-understood or standard mitigation measures to mitigate the effect or effect pathway(s); or</i></li> <li>• <i>Commitments made by the proponent (e.g., in the Initial Project Description).</i></li> </ul>	<p><i>Describe information the proponent can provide, or commitments the proponent can make, in their Response to the Summary of Issues that would provide confidence that the issue can be resolved by existing means.</i></p> <p><i>Consider whether information, studies, analyses or collaborative work with other authorities would be required to address the issue beyond existing means.</i></p>

Comment ID	c) Key issue	Project component or activity	c)(i) Biophysical effect pathway(s)	c)(ii) Concern unique to the project or a priority within your mandate	c)(iii) Material to federal decision-making	d) Means for issue resolution	e) Additional information from the proponent
DFO-01	The key issue is potential flow reductions in Harper Creek, its tributaries and Baker Creek during summer bull trout migration, fall bull trout spawning, and overwintering periods. These reductions may result in a loss of productivity through death of fish, and/or harmful alteration, disruption and/or destruction of fish habitat.	The project components linked to the key issue are the construction, operation and closure of the open pit and the Tailings Storage Facility, and ongoing water management throughout all project activities.	The biophysical effect pathways between the relevant project components and Harper Creek/ Baker Creek bull trout include: <ul style="list-style-type: none"> <li>• placement of materials in water;</li> <li>• water level/flow modifications;</li> <li>• water diversion; and</li> <li>• dewatering.</li> </ul>	Alteration of surface water and groundwater flow is common for mining projects of this scale. The receiving environment, specifically Harper Creek, is noteworthy because the high elevation, cold water stream provides important spawning and juvenile rearing habitat for a bull trout population in the lower North Thompson watershed. This population is known to spawn in Harper Creek, and migrate extensive distances, including into the South Thompson to feed at certain times of the year.	The key issue is important to the decision maker because the project may result in an adverse effect within DFO jurisdiction. The impact may be significant based on the presence of sensitive species and habitats.  The issue is challenging to address because impacts to surface flow and groundwater flow rates can be difficult to measure, model and confirm. Subject Matter Experts in hydrology and hydrogeology are required to determine potential impacts. High levels of uncertainty are common in the complex modelling approaches used in these assessments.	The Proponent will need to provide assurance that impacts to surface flow and groundwater flow are adequately characterized. Uncertainties in these predictions should be considered in the Proponent's Environmental Flow Needs (EFN) assessments. Impacts arising from changes to surface water flow can be mitigated by development of storage reservoirs. Mitigation measures to address impacts to groundwater flow are much more challenging to implement.	The Proponent can commit to providing hydrology and hydrogeology assessments for the baseline, construction, operations and closure periods. The Proponent can use these studies to inform the risk to fish and fish habitat.

Please insert additional rows as necessary.