



Adams Lake Indian Band

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September 15, 2025

Re: Initial Project Description and Substitution Request for the Yellowhead Mine Project

Dear Charlene Mortensen and Aidan Fehr,

On behalf of Chief and Council of the Adams Lake Indian Band (ALIB), we are writing regarding the Taseko Yellowhead Mine Project and the associated regulatory process.

ALIB has reviewed the Initial Project Description (IPD) submitted by Taseko Mines Ltd. and has also considered the Province of British Columbia's request to substitute its provincial environmental assessment process under the Impact Assessment Act. We confirm our intention on being a participating Indigenous Nation and our interest in receiving federal grants to support our participation.

Concerning the initial project description, ALIB has significant concerns regarding the scope and sufficiency of the information provided in the IPD. The description does not adequately address potential adverse impacts to ALIB's Aboriginal Title, Rights, and Interests, particularly in relation to water quality, fisheries, cumulative effects, and cultural heritage. These gaps need to be remedied early in the process to allow for informed participation.

On the topic of the substitution request, while ALIB recognizes the efficiencies that can arise from substitution, we emphasize that any substituted process must uphold the Crown's duty to consult and accommodate ALIB fully. The journey must also be aligned with the principles of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and British Columbia's Declaration on the Rights of Indigenous Peoples Act (DRIPA). Substitution cannot diminish federal obligations under the Impact Assessment Act, including requirements for transparency, Indigenous participation, and consideration of cumulative and interjurisdictional impacts.

Importantly, ALIB stresses that "streamlining" must not become "steamrolling." We acknowledge the desire for timely processes; however, the exercise of free, prior, and informed consent must not be hastened at the expense of meaningful consultation, rigorous assessment, and the protection of Secwepemc rights and lands.

ALIB reminds the Crown that the Douglas Colonial Reserve established at Adams Lake in 1861 forms a part of our historical land base and is central to our Aboriginal Title and Rights. As confirmed by the Supreme Court of Canada in *Williams Lake Indian Band v. Canada (2018)*, the Crown's fiduciary duty requires it to protect Indigenous lands and cannot be avoided by reference to "lawful takings" or procedural shortcuts. Similarly, the recent *Cowichan Tribes v. British Columbia* decision of the BC Supreme Court, though under appeal, reflects a growing judicial trend toward holding governments accountable for failing to safeguard Indigenous land rights. In this context, ALIB stresses that the Douglas Colonial Reserve must be meaningfully considered in any assessment of the Taseko Yellowhead Mine Project. Federal decision-making must not favour one Nation over another by overlooking ALIB's established history and rights, particularly when those rights are grounded in recognized reserve lands and supported by case law.

Overall, ALIB confirms its interest in participating in the federal impact assessment process for the Taseko Yellowhead Mine Project. Meaningful participation by ALIB requires resourcing, technical support, and a process that respects and integrates Secwepemc laws, knowledge, and governance. As a result, we request that the Impact Assessment Agency of Canada ensure that ALIB is fully engaged throughout all stages of this review and that our concerns are meaningfully addressed before any regulatory decisions are made.

Please confirm receipt of this letter and keep us informed of all next steps regarding the substitution decision and subsequent assessment processes.

Respectfully,

A black rectangular redaction box covering the signature of the sender.

Kukpi7 Lynn Kenoras-Duck Chief