

Anaskaski Governance Society
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October 14, 2026

Tanishka Gupta
Senior Policy Analyst Impact
Assessment Agency of Canada

Chelsea Garside
Acting Project Assessment Director
BC Environmental Assessment Office

Re: Berg Copper Project — Anaskaski's initial comments on the Initial Project Description and BC's request for substitution

Dear Ms. Gupta and Ms. Garside:

The House of Anaskaski / House Where It Lies Blocking the Trail, House Territory Code W06, provides these initial comments in response to the September 15, 2026 letter concerning Surge Copper Corp.'s proposed Berg Copper Project.

Anaskaski understands that the Project includes a new open-pit copper-molybdenum mine approximately 80 kilometres southwest of Houston, BC; an anticipated 28-year mine life; production of approximately 43 million tonnes of ore per year; and a proposed transmission line to the Telkwa substation. The agencies have identified that House Code W06 overlaps with the proposed transmission line.

Initial concerns and issues

Anaskaski's initial concern is that the proposed transmission line and associated works may affect Anaskaski's title, rights, interests, governance responsibilities, lands, waters, cultural heritage, and use and occupancy within its respective territory. These concerns extend beyond the physical line footprint to all associated activities, including route selection, clearing, road construction or upgrades, camps, borrow sources, water crossings, access management, maintenance, and cumulative effects.

The information currently available is insufficient for Anaskaski to determine the nature, extent, duration, and significance of potential effects. Before conclusions are drawn, Anaskaski requires sufficiently detailed information concerning:

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- the transmission-line route, width, location of towers and substations, clearing requirements, access routes, and construction methods;
- construction and operational schedules, work camps, traffic, aviation, fuel handling, waste management, and emergency-response plans;
- effects on water, fish and fish habitat, wildlife, vegetation, harvesting, travel routes, cultural places, and the exercise of Anaskaski's rights;
- potential effects from the mine, tailings, waste rock, water management, air emissions, noise, light, and infrastructure that may combine with transmission-line effects; and
- cumulative effects from existing, approved, reasonably foreseeable, and proposed activities within Anaskaski territory.

Anaskaski expects the assessment to be informed directly by its knowledge holders and governance representatives. The process must provide adequate time, resources, confidentiality protections, and decision-making opportunities for Anaskaski to identify its interests and assess potential effects in accordance with its laws and responsibilities.

Position on substitution

At this early stage, Anaskaski does **not** provide consent to substitution of a provincial assessment for any federal impact assessment that may be required. The record presently available does not demonstrate that substitution would protect Anaskaski's rights and interests or provide a process equivalent to the federal assessment framework.

Any consideration of substitution must be conditional on meaningful Indigenous participation; direct consultation with Anaskaski; sufficient funding and capacity; transparent and enforceable assessment requirements; protection for confidential information; consideration of federal matters and Indigenous rights; and clear opportunities for Anaskaski to communicate consent or lack of consent. Anaskaski reserves the right to provide further views as more information becomes available.

Reservation of rights

These comments are preliminary and are provided **without prejudice to, and without waiver, limitation, extinguishment, or derogation from, Anaskaski's asserted and existing Aboriginal title, Aboriginal rights, inherent governance rights, Wet'suwet'en law, interests,**



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jurisdiction, and claims. They do not constitute consent to the Project, any Project component, the proposed transmission line, the assessment process, or substitution.

Detailed information about Anaskaski's rights, interests, territory, cultural heritage, and land use may be confidential or culturally sensitive. It will be addressed separately under suitable confidentiality arrangements and must not be publicly disclosed without Anaskaski's authorization.

Sincerely,

Chief Madeek For and on behalf of the House of Anaskaski House Where It Lies Blocking the Trail House Code W06