Nanika Lake Outfitters Inc.

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November 6, 2026

British Columbia Environmental Assessment Office
1810 Blanshard St
Victoria, BC
V8T 0C3

Impact Assessment Agency of Canada
1800, 1138 Melville Street
Vancouver, BC
V6E 4S3

Re: Berg Copper Project - Initial Project Description Federal Project
Reference No. 90756
Formal Submission Opposing the Proposed Development

To Whom It May Concern:

I am writing on behalf of Nanika Lake Outfitters Inc., a licensed guide outfitting business operating within an allocated guiding territory in the Nanika Lake region of British Columbia. Our business is an established commercial land user whose long-term viability depends upon healthy wildlife populations, functioning aquatic ecosystems, and the preservation of the region's remote wilderness character. In addition, we recognize and support the province's identification in the early 1990s of the area surrounding Nanika Lake and Kidprice Lake as a study area for future protection, identifying conservation features of national and international significance.

We are writing to formally express our strong opposition to Surge Copper Corporation's proposed Berg Copper Project in its currently contemplated location and configuration. Based on the information presently available and relevant historical events, we are concerned that the project presents substantial environmental risks that have not been adequately addressed or demonstrated to be avoidable.

Our opposition is not based on a general objection to mineral development. Rather, it arises from the particular sensitivity of the proposed project area, the scale and duration of the contemplated mining operation, the potential for long-term effects on wildlife and connected aquatic ecosystems, and the consequences for existing businesses and land users that depend upon the ecological integrity of this region.

We recognize the economic importance of copper and other critical minerals. However, the anticipated economic benefits of the project must be weighed against the potential loss or impairment of natural capital, wildlife habitat, freshwater resources, wilderness values, and established recreational activities. These existing values have economic, ecological and public significance that should not be discounted simply because they do not form part of the direct financial analysis.

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In our view, the available project description does not yet demonstrate that the Berg Copper Project can proceed without unacceptable consequences for these values. We therefore request a rigorous, transparent and independent assessment of the project's potential effects, including a meaningful examination of alternatives and the possibility that the project, as currently proposed, may not be an appropriate use of this location.

1. Scale, duration and industrialization of the landscape

According to Surge Copper's published 2026 pre-feasibility study and the federal Initial Project Description, the Berg Copper Project contemplates an open-pit mining and processing operation capable of processing approximately 120,000 tonnes of ore per day. Associated infrastructure would include processing facilities, waste rock and tailings management facilities, water-management infrastructure, access roads, conveyors, accommodation facilities and a new high-voltage electrical transmission connection.

The anticipated operating life is approximately three decades, in addition to the construction, closure, reclamation and post-closure monitoring periods. The project would therefore have consequences extending well beyond its active operating life.

A development of this scale has the potential to fundamentally change the character and use of the affected landscape for generations. Its impacts cannot be adequately assessed by examining only the physical footprint of the open pit and associated mine facilities. The assessment must also consider the broader effects of industrial activity and infrastructure on wildlife movement, seasonal habitat use, watershed function, human access and the cumulative effects of existing and future development.

The proposed development must also be considered in the context of established wilderness-based businesses that rely upon the continued ecological integrity and remoteness of the surrounding region.

We request that the assessment evaluate whether a project of this scale and duration is compatible with the long-term protection of the region's environmental values, the continued viability of existing guide outfitting operations and the enjoyment of the surrounding natural habitat by recreational users and indigenous groups.

2. Wildlife populations, habitat and sustainable wildlife management

Our guide outfitting business depends upon the long-term health, distribution and sustainability of wildlife populations and the habitats on which they rely. We are concerned that the project could affect wildlife (including aquatic) directly through habitat removal and indirectly through disturbance, fragmentation, increased human access and changes in animal behaviour.

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Potential effects include:

- Direct loss and fragmentation of seasonal and year-round habitat.
- Disruption of migration corridors and movement between feeding, breeding, calving, denning and wintering areas.
- Disturbance from blasting, construction, heavy equipment, industrial traffic, artificial lighting and ongoing mine operations.
- Increased wildlife mortality and human-wildlife conflict associated with additional roads and industrial access.
- Significantly increased opportunities for unauthorized hunting and recreational access beyond what currently exists.
- Changes in wildlife distribution that reduce the availability of animals within established guiding territories.
- Cumulative impacts arising from the interaction of the project with forestry roads, harvesting activities, transmission corridors and other regional disturbances.

Particular attention should be given to grizzly bears, black bears, moose, caribou, mountain goats and other wildlife species documented within the relevant regional ecosystems.

We are especially concerned that wildlife may be displaced from established habitat, that seasonal movement patterns may be altered, and that mortality risks may increase. Such impacts cannot be adequately evaluated by calculating the number of hectares directly disturbed by the mine. A comparatively narrow road or transmission corridor may affect wildlife movement and habitat effectiveness over a much larger area. Similarly, disturbance during sensitive breeding, calving or winter periods may have consequences disproportionate to the area physically affected. We are also concerned about impacts to Nanika Lake, Kidprice Lake and groundwater in the vicinity from mine activities, including the proposed water withdrawal from Nanika Lake. Such impacts could include a reduction in native fish species in these lakes and substantial degradation of recreational use and guiding in the area.

We request independent, species-specific studies addressing wildlife abundance, aquatic species impacts, impacts on Nanika Lake and downstream water bodies, seasonal distribution, habitat use, movement corridors, connectivity and predicted population-level effects. These studies should cover the mine site, proposed transportation and transmission corridors, associated infrastructure and surrounding areas relevant to existing guiding territories.

The assessment must also consider the implications for provincial wildlife management, including established habitat objectives, sustainable harvest opportunities and the long-term maintenance of viable wildlife populations.

The absence of a demonstrated regional population decline should not, in itself, be treated as evidence that the project would have no material effect on wildlife or on the commercial activities that depend upon wildlife availability within particular areas.

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3. Impacts on existing guide outfitting operations and commercial land use

Nanika Lake Outfitters Inc. operates within British Columbia's regulated guide outfitting framework. Our business depends on sustainable wildlife and aquatic populations, reliable access to suitable hunting areas, and the preservation of the remote and natural environment that clients expect when purchasing a guided wilderness experience.

The proposed development could adversely affect our operations even if wildlife continues to inhabit the broader region. Changes in animal distribution, hunting conditions, fish species and abundance, access, noise levels and the character of the landscape may reduce the practical availability of wildlife within our guiding territory and diminish the quality of the experience we provide.

Potential economic consequences include:

- Reduced availability or altered distribution of huntable wildlife and fish.
- Loss of productive hunting areas or disruption of established hunting routes.
- Changes in future harvest opportunities or allocations resulting from habitat or population effects.
- Increased industrial traffic and competition for access.
- Noise, artificial lighting, visual intrusion and diminished wilderness quality.
- Increased wildfire risk associated with industrial activities and infrastructure.
- Reduced client demand, business revenue and operating profitability.
- Diminished business value and long-term commercial viability.

These impacts may occur regardless of whether the outfitting territory overlaps directly with the open pit or other principal mine facilities. The relevant consideration is whether project-related activities affect the wildlife, access and wilderness characteristics on which the existing business depends.

The environmental assessment should therefore identify the extent of overlap between the project and existing guide outfitting territories, including traditional hunting areas, access routes and areas of seasonal wildlife use. It should evaluate the implications for wildlife availability, provincial wildlife management and the sustainability of existing guiding opportunities.

We request an independent socioeconomic assessment of the potential effects on established guide outfitters and other wilderness-based commercial operators. That assessment should consider potential changes in revenue, operating costs, client demand, harvest opportunities and business value, as well as the effectiveness of proposed mitigation measures.

Where material adverse effects cannot be avoided, the assessment should identify how those effects would be addressed, including whether meaningful mitigation or compensation would be available.

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Existing guide outfitting operations represent established commercial uses of the land. Their economic contribution and potential losses should be considered alongside the anticipated economic benefits of the proposed mine.

We also request that the relevant provincial wildlife management professionals, affected licensed guide outfitters, Indigenous groups and knowledge holders be meaningfully involved in assessing these matters.

4. Protection of Nanika Lake, Kidprice Lake and connected watersheds

The potential effects of the project on Nanika Lake, Kidprice Lake and their connected aquatic environments are among our principal concerns.

The project description contemplates water withdrawal and management infrastructure, tailings and waste facilities including tailings and waste water pipelines, and associated roads and stream crossings within a landscape containing lakes, streams and interconnected watersheds. These systems must be assessed as a connected hydrological and ecological network rather than as isolated water bodies or individual infrastructure sites.

Publicly available provincial research-permit information from 2026 identifies aquatic investigations involving Kidprice Lake, Stepp Lake and tributaries of the Ney River associated with proposed project infrastructure and stream crossings. This reinforces the importance of a comprehensive assessment of hydrological connectivity and potential downstream effects.

Water withdrawal from Nanika Lake

The initial project information does not adequately disclose the intended pumping rate and annual volume of fresh water to be withdrawn from Nanika Lake.

Without this information, it is not possible to meaningfully evaluate the potential effects of the proposed withdrawal on lake levels, seasonal water availability, aquatic habitat and the surrounding watershed. The assessment should establish the proposed withdrawal rates, seasonal demand, expected duration of withdrawals and the lake's capacity to replenish the extracted water under a range of hydrological conditions.

We request that Surge Copper demonstrate, through rigorous hydrological studies, that any proposed withdrawal can be sustained without unacceptable effects on lake levels, connected surface waters, aquatic ecosystems or other existing uses.

Our preferred approach is to eliminate surface-water withdrawals from Nanika Lake in favour of localized groundwater alternatives, subject to comprehensive hydrogeological assessments demonstrating that groundwater extraction would not adversely affect connected surface waters, local aquifers or other environmental values.

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Any alternative water supply arrangement should be evaluated transparently, with its potential environmental effects and limitations clearly identified.

Groundwater availability, connectivity and potential impacts

We support the evaluation of groundwater as an alternative water source but that should be based on a comprehensive understanding of the relationship between local aquifers, Nanika Lake and the surrounding surface-water network. Groundwater cannot be assumed to provide a lower-impact alternative simply because it avoids direct pumping from the lake.

We request that Surge Copper undertake a detailed hydrogeological assessment establishing the location, extent, recharge characteristics and sustainable yield of the relevant aquifers. The assessment should identify the direction and rate of groundwater flow, seasonal fluctuations in groundwater levels, and the extent to which groundwater contributes to the replenishment of Nanika Lake, nearby lakes, streams and wetlands.

Particular attention should be given to whether groundwater extraction could reduce groundwater discharge to connected surface waters, lower local water tables, affect aquatic and terrestrial habitat, or interfere with the natural hydrological balance of the Nanika Lake–Kidprice Lake region. The assessment should consider cumulative water demand, seasonal low-flow conditions, drought, climate change and reasonably foreseeable changes in precipitation and recharge.

Any proposed groundwater alternative should also be evaluated for its potential to affect existing users of groundwater and surface water, as well as the ecological functions supported by groundwater-dependent environments. Consideration of placement of groundwater wells may mitigate the impact on the surrounding environment.

Tailings and waste management facility, spillway and discharge risks

The proposed tailings and waste management facility (TWMF) is described as incorporating a spillway designed to accommodate the probable maximum flood. However, the information presently available does not adequately establish the spillway's precise location, the downstream receiving environment or the consequences of a spillway discharge.

The Highland Valley Copper Mine provides a relevant example of the environmental management challenges associated with large-scale tailings storage facilities. The mine operates an extensive tailings storage system, including the Highland Tailings Storage Facility and associated water management and seepage collection infrastructure. In its May 2025 assessment of the Highland Valley Copper Mine Life Extension Project, the BC Environmental Assessment Office identified potential increased seepage from the expanded tailings storage facility into Pukaist Creek, as well as concerns regarding seepage pathways and potential effects on groundwater and surface water quality. The assessment also recognized existing significant cumulative effects on groundwater quantity. This experience demonstrates that even at an

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established mine with substantial engineered infrastructure and ongoing environmental monitoring, tailings seepage and the protection of surrounding water resources remain important environmental considerations. It reinforces the need for the Berg Project to demonstrate that the proposed TWMF design, liner and embankment systems, seepage collection infrastructure and water management measures will effectively protect groundwater and connected surface waters throughout construction, operations, closure and post-closure. The assessment must also consider the long-term performance and potential deterioration of these systems, including the consequences of seepage that may not become apparent until many years after the facility is constructed or the mine has closed.

The Mount Polley Mine tailings storage facility failure on August 4, 2014, provides a significant and sobering example of the potential consequences of a failure in a mine waste containment facility. The failure resulted in the uncontrolled release of approximately 17 million cubic metres of water and 8 million cubic metres of tailings and other material into Polley Lake, Hazeltine Creek and Quesnel Lake. The resulting environmental damage required extensive emergency response, remediation and ongoing environmental monitoring.

The Mount Polley incident demonstrates that the consequences of a tailings storage facility failure can extend well beyond the mine site and that design assumptions, incomplete geotechnical investigations or deficiencies in water management can have catastrophic consequences. It also demonstrates that the existence of monitoring systems and engineered containment measures cannot, on their own, guarantee the protection of surrounding watercourses and downstream receiving environments.

In the context of the proposed Berg Project, this precedent reinforces the need for comprehensive and independently reviewed geotechnical investigations of the entire TWMF foundation and associated embankments, including detailed characterization of underlying soils, bedrock, groundwater conditions and potential seepage pathways. Surge should demonstrate that the facility's design adequately accounts for actual site conditions and that its stability has been assessed under normal operating conditions, extreme precipitation and flood events, seismic events, changing groundwater conditions and reasonably foreseeable climate-related conditions.

The assessment must also consider the potential consequences of a partial or complete TWMF failure, including the potential release of tailings, process water, dissolved metals and other contaminants into Nanika Lake, Kidprice Lake and connected downstream watercourses. The assessment should not simply demonstrate that the TWMF is designed to meet applicable engineering standards; it should demonstrate that the consequences of a failure have been fully understood and that the proposed design and risk management measures provide an acceptable level of protection to the surrounding environment and downstream users.

The Mount Polley failure is a reminder that the environmental consequences of a tailings facility failure can be immediate, extensive and exceptionally difficult to reverse. Given the proposed location of the Berg Project within the Nanika Lake watershed, we are particularly concerned about the potential consequences of a TWMF failure and the possibility of long-term damage to water quality, aquatic habitat, wildlife and the commercial uses that depend on a healthy watershed. These risks must be fully assessed

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and addressed before the Project can be considered environmentally acceptable. The risks associated with the proposed TWMF in this pristine wilderness are more acute given the small size of the proponent, its limited financial resources, and the impracticability of the company to adequately monitor the TWMF, and to manage and remediate any failure event, for many years after the mine stops generating revenue.

Tailings and reclaim-water pipelines

The project description identifies a system in which tailings and waste are transported to the TWMF through a tailings pipeline and processed water is returned through a water reclaim pipeline. However, the available information does not adequately address the potential consequences of pipeline rupture, joint failure, freezing-related damage or other breaches.

We request a detailed assessment of pipeline failure scenarios, including the likely flow paths of released water, the potential for contaminants or sediment to enter local watersheds, and the time required to detect and isolate a breach.

The assessment should identify proposed containment infrastructure along pipeline corridors, including catchments, secondary containment or double-walled piping where appropriate, together with leak monitoring systems, emergency shut-off arrangements and response procedures.

Surge Copper should demonstrate how spills would be contained and prevented from entering nearby lakes, streams and connected watersheds under reasonably foreseeable failure conditions.

Acid rock drainage and long-term water quality

The project description indicates that PAG materials are intended to be stored under water to limit oxidation and minimize the potential for acid rock drainage (ARD).

These stated objectives do not, by themselves, demonstrate that the risk of ARD or metal leaching has been adequately addressed. We are concerned about the potential for contaminated drainage to affect groundwater and surface-water systems during operations, which is a common concern when earthen dams are used to contain mine waste, and long after active mining has ceased.

The Bell and Granisle copper mines on Babine Lake are both former open-pit copper mines with mine rock and tailings identified as potentially acid-generating. Their closure has not eliminated the need to manage mine-impacted water. Technical documentation concerning the Bell and Granisle sites identifies ongoing seepage and drainage concerns associated with potentially acid-generating mine materials and the continued need for water management and monitoring.

These examples are especially relevant because they demonstrate that the presence of a large receiving lake does not eliminate the risk of long-term impacts from mine drainage. The management of contaminated water, seepage and metal loading can remain an issue decades after mining has ceased.

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The Equity Silver Mine provides a further and particularly important example of the potential duration and cost of ARD liabilities. ARD was identified at the mine in 1981, shortly after production began. Drainage from waste rock required collection and treatment, and other important measures to reduce acid generation and manage contaminated water. Despite the mine's closure in the 1990s, ARD management has continued to require substantial ongoing attention. Company disclosures have indicated that ARD collection and treatment at the site were expected to continue indefinitely. A British Columbia government-commissioned review of mine reclamation security has also identified Equity Silver as an example of a site where ARD treatment may continue for 50 to 100 years extending across generations creating significant ongoing costs after the economic benefits of the mine have ended.

These examples are directly relevant to the proposed Berg Project. The project description acknowledges that the proposed management strategy for PAG waste rock within the TWMF depends on maintaining a stable, permanent water cover to prevent acid generation. It also acknowledges that loss of that water cover through drought, dam breach or operational drawdown could result in the re-exposure of PAG material and the onset of ARD, with subsequent groundwater contamination.

This approach creates a long-term dependency on the continued integrity of the TWMF, the maintenance of appropriate water levels, the performance of containment and seepage collection systems, and the availability of water treatment infrastructure. The proposal must demonstrate that these systems can be maintained reliably throughout operations, closure and post-closure, including under adverse conditions and where active mine operations are no longer available to support water management.

The assessment must specifically consider the potential for ARD and metal leaching to develop or increase after closure, including delayed onset, changing groundwater conditions, loss or deterioration of engineered covers, seepage through embankments and foundations, and the consequences of a partial or complete loss of the proposed water cover. It should also assess the potential for contaminants to migrate through groundwater and enter Nanika Lake, Kidprice Lake and other connected water bodies.

We request comprehensive geochemical testing and modelling of acid rock drainage and metal-leaching potential, an assessment of groundwater seepage beneath the TWMF, and a detailed evaluation of the long-term effectiveness of the proposed water cover and associated containment measures.

Groundwater pathways and long-term contaminant migration

The assessment must specifically address the potential for contaminated water from the TWMF, tailings, waste rock and other mine facilities to enter groundwater and migrate beyond the immediate project footprint. An assessment focused primarily on surface-water management would be insufficient if contaminants could also move through groundwater pathways and subsequently discharge into lakes, streams or other sensitive receiving environments.

We request that Surge Copper provide a detailed hydrogeological characterization of the proposed facility locations, including the permeability and characteristics of underlying soils and bedrock, groundwater

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flow directions, seasonal groundwater levels, and any geological structures that could provide pathways for seepage or contaminant migration.

The assessment should evaluate the potential for seepage beneath and around the TWMF, including the movement of potential acidic drainage and dissolved metals through groundwater. It should also examine the possibility that groundwater contamination may develop gradually and remain undetected for an extended period before affecting a surface-water receptor.

Groundwater modelling should address normal operating conditions, reasonably foreseeable facility failures, extreme hydrological conditions, closure and long-term post-closure scenarios. The modelling assumptions, predicted groundwater flow paths and potential contaminant concentrations should be independently reviewed and supported by appropriate baseline data.

We further request a groundwater monitoring and response plan that identifies monitoring locations, sampling frequency, measurable performance criteria, early-warning thresholds and mandatory corrective actions. The plan should demonstrate how contamination would be detected and addressed before it causes material harm to connected surface waters, fish habitat or other sensitive environmental receptors.

Monitoring and corrective-action obligations must extend beyond the cessation of mining for as long as a credible risk of contaminant migration remains. Surge Copper should also demonstrate that sufficient financial security will be available to fund any required long-term treatment, remediation and monitoring.

Comprehensive watershed assessment

We request a watershed-scale hydrological and aquatic assessment that addresses the combined effects of water withdrawal, mine drainage, contact water, tailings and waste management, erosion, sedimentation and associated infrastructure.

The assessment should consider impacts on fish spawning, rearing and migration, aquatic food webs, downstream water quality and ecologically important receiving environments. It should also establish the likely performance of proposed mitigation measures under normal operating conditions and reasonably foreseeable adverse scenarios.

Independent scientific review should be undertaken where necessary to establish the reliability of the assumptions, predictive models and proposed safeguards.

The existence of engineered water-management systems should not be treated as proof that material environmental risks have been eliminated. The assessment must demonstrate whether those systems can adequately protect the relevant aquatic environments over the full project life and beyond closure.

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In our view, any material residual risk of irreversible damage to sensitive aquatic ecosystems should weigh heavily in determining whether the project is appropriate for this location.

5. Increased access, cumulative effects and loss of wilderness character

The remoteness and relatively limited degree of industrial access in our guiding territory are fundamental to its value for wildlife, conservation and guided hunting and fishing.

The proposed development will introduce increased industrial traffic, roads, noise, lighting and human activity extending beyond the immediate mine footprint. These changes may affect wildlife movement, increase mortality risks, facilitate unauthorized access and diminish the wilderness experience on which regional commercial activities depend.

These effects may persist after mine closure if roads, transmission corridors and other infrastructure remain available for subsequent uses.

The project must also be assessed in the context of existing and reasonably foreseeable development, including forestry, roads, mineral exploration, transmission infrastructure and other industrial activities. The cumulative effects of multiple disturbances may be materially greater than the effects attributed to any single project.

We are particularly concerned about the combined consequences of habitat fragmentation, increased access, industrial noise, continuous artificial lighting and the potential for wildfire associated with blasting, heavy equipment and electrical infrastructure. We understand this proposed mine will be operated on a 24/7 365 day a year basis. Blasting rock, running heavy processing equipment, artificial lighting, etc. could have a significant negative impact on existing recreation and other activities in the area which was highlighted and admitted to by Surge Copper.

Although the project description refers to noise and vibration assessment, it does not adequately establish the proposed measures for wildfire prevention and suppression or the long-term management of increased access and lighting.

We request an integrated regional cumulative-effects assessment that considers existing disturbances, reasonably foreseeable future development, and the full operating and post-closure life of the mine. The assessment should address habitat loss, habitat effectiveness, wildlife movement and mortality, watershed impacts, changes in wildlife distribution, wildfire risk and the sustainability of existing wilderness-based commercial activities.

Surge Copper should also provide a comprehensive access-management plan identifying which roads and corridors would remain available for public or industrial use, which would be restricted or reclaimed, and how restrictions would be implemented, funded and enforced.

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A comprehensive light-abatement plan should be required, incorporating low-intensity lighting, appropriate fixture direction and motion-activated systems where structurally feasible. The assessment should also identify measures to limit unnecessary noise and disturbance, together with specific wildfire prevention, detection and suppression commitments.

Any proposed mitigation should be supported by clear implementation responsibilities, enforceable commitments and adequate long-term funding.

6. Project alternatives and independent assessment

The anticipated economic benefits of the Berg Copper Project must be considered alongside its environmental and socioeconomic costs, including the potential loss of existing economic activity and environmental values that may not be reflected in the financial feasibility analysis.

The assessment should not proceed on the assumption that mining is necessarily the preferred use of this particular location or that the project's anticipated benefits automatically justify the associated risks.

We request a rigorous evaluation of technically and economically feasible alternatives, including alternative infrastructure routes, tailings and waste-management locations, water supply arrangements and project designs that could avoid or materially reduce effects on sensitive habitat, connected watersheds and existing guiding activities.

The assessment should distinguish between effects that can be avoided, effects that can be mitigated and residual effects that may remain despite proposed mitigation. Where impacts cannot reasonably be avoided, the assessment should identify them transparently rather than assume that they can be fully offset through compensatory measures.

We further request independent scientific review of the principal environmental assessments, meaningful participation by affected First Nations and existing land users, and transparent disclosure of baseline data, predictive models and proposed monitoring and mitigation measures.

If the assessment identifies significant adverse effects that cannot be adequately avoided or reduced to acceptable levels, those findings should be given substantive weight in determining whether the project should proceed.

7. Reclamation, closure planning and financial security

The scale, duration and complexity of the proposed development raise significant concerns regarding long-term environmental liabilities and the adequacy of financial provisions for closure, reclamation and post-closure obligations. Surge is a relatively small company with modest financial resources. Steps should be taken to ensure that there will be financial capacity to deal with post closure obligations, long

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after the project stops generating revenue, and a means to fund the reclamation obligations more than 30 years into the future should be considered and committed to.

The project identifies an initial mine closure cost estimate of approximately $236 million. We are concerned that the ultimate cost could exceed this estimate because of unforeseen environmental conditions, inflation, changing regulatory requirements, prolonged monitoring obligations or the need for extended water treatment and remediation.

The assessment should clarify the assumptions underlying the closure cost estimate, the scope of liabilities included, and the mechanisms that would ensure sufficient funds remain available throughout the project's life.

At a minimum, the closure estimate should be subject to regular independent review and adjustment for inflation, updated technical information, contingencies and changes in the anticipated scope of reclamation and post-closure work.

We request that sufficient legally enforceable financial security be required to cover the full estimated cost of reclamation and applicable closure and post-closure obligations. The security should be structured to remain available to the responsible authorities if Surge Copper becomes unable or unwilling to meet its obligations.

The assessment should address funding for, among other things:

- Reclamation and remediation of disturbed areas.
- Long-term water treatment and water-quality monitoring.
- Management of acid rock drainage and metal-leaching risks.
- Maintenance of relevant infrastructure and containment systems.
- Post-closure environmental monitoring and corrective action.
- Unforeseen environmental impacts and additional remediation requirements.

Given the historical volatility of global commodity markets, financial security should not depend solely on the future profitability of the mine or Surge Copper's continued financial capacity.

We request independent auditing of closure and reclamation estimates, appropriate contingency provisions, periodic reassessment of financial security, and enforceable arrangements providing the responsible authorities with access to sufficient funds when required.

The assessment must demonstrate how the full lifecycle of environmental liabilities will be funded without transferring material unfunded costs or risks to local businesses, the public or British Columbia taxpayers.

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8. Accuracy of affected-party mapping and recognition of existing tenure

The proposal includes mapping and information concerning potentially affected property owners and tenure holders. However, our licence of occupation (Tenure number 636330 and Crown file number 6402693) in the immediate vicinity of the proposed project does not appear to have been reflected in the relevant list or mapping, although our guide outfitter certificate (GTC 610032) has been identified, albeit with an incorrect certificate number on the mapping details (GTC 610011).

We request that Surge Copper and the responsible assessment authorities review the relevant lists and maps to ensure they accurately identify all existing licences, tenures, guiding territories and other established land uses that may be affected by the project.

Accurate identification of affected parties is essential to ensuring that the assessment properly considers existing commercial activities, access arrangements and potential environmental and socioeconomic impacts.

We further request that Nanika Lake Outfitters Inc. be formally recognized as an affected commercial land user and provided with notice of, and meaningful opportunities to participate in, subsequent stages of the assessment process.

9. Requested actions

Based on the concerns outlined above, we respectfully request that the British Columbia Environmental Assessment Office and the Impact Assessment Agency of Canada require the following:

1. **Recognition and participation:** Recognize Nanika Lake Outfitters Inc. as an affected commercial land user and provide meaningful opportunities to participate throughout the assessment process.
2. **Wildlife and habitat assessment:** Require independent, species-specific studies addressing wildlife abundance, seasonal habitat use, movement corridors, habitat connectivity, population-level effects and cumulative disturbance.
3. **Watershed and aquatic assessment:** Require a comprehensive watershed-scale assessment of Nanika Lake, Kidprice Lake and connected aquatic ecosystems, including proposed water withdrawals, downstream effects, fish habitat, mine waste, credible failure scenarios and post-closure risks.
4. **Independent socioeconomic assessment:** Evaluate the potential effects on existing guide outfitting businesses and other wilderness-based recreation operations, including changes in wildlife availability, access, client demand, revenue and business viability.
5. **Wildlife management implications:** Assess the implications for provincial wildlife management, habitat objectives, wildlife abundance, sustainable harvest opportunities and the long-term viability of existing guiding territories.

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6. **Cumulative-effects assessment:** Evaluate the combined effects of the proposed mine, existing industrial disturbances, increased access, reasonably foreseeable development, artificial lighting and wildfire risk.
7. **Project alternatives:** Require a rigorous assessment of feasible alternatives that could avoid or materially reduce impacts on sensitive watersheds, wildlife habitat, existing land users and wilderness-based businesses.
8. **Transparent disclosure and independent review:** Ensure the timely disclosure of relevant baseline environmental data, wildlife surveys, hydrological and geochemical studies, tailings and mine-waste assessments, predictive models and proposed mitigation and monitoring measures.
9. **Reclamation and financial assurance:** Require adequate, independently reviewed and enforceable financial security covering the full lifecycle of reclamation, closure and post-closure environmental obligations, with appropriate contingencies and periodic adjustments.
10. **Consideration of project refusal:** Give substantive consideration to refusing the project if significant adverse environmental or socioeconomic effects cannot be adequately avoided or reduced to acceptable levels.

We request that these matters be addressed before any determination is made that the project, in its currently proposed form, is environmentally and socioeconomically acceptable.

10. Conclusion

The Nanika Lake region possesses environmental, ecological and economic values that extend well beyond its mineral resources. Its wildlife populations, aquatic ecosystems, natural landscape and wilderness character support biodiversity, established commercial activities and broader regional interests.

Nanika Lake Outfitters Inc. is an existing business within this landscape and depends upon the continued availability of wildlife, access to suitable hunting areas, survival of a thriving aquatic environment at Nanika and Kidprice Lakes, peace and quiet and generally, the preservation of a high-quality wilderness experience. The Berg Copper Project has the potential to materially affect those interests, as well as the environmental systems upon which they depend.

We recognize the potential economic benefits of the proposed mine. However, those benefits must be assessed alongside the risks of lasting or irreversible environmental damage, the costs of long-term reclamation and water management, and the potential loss of established economic activities.

Based on the information presently available, we are not satisfied that the project's environmental and socioeconomic risks have been adequately addressed or that the proposed safeguards would be sufficient to protect these existing values throughout the project's operating and post-closure periods.

The concerns raised in this submission are not hypothetical. The experiences of the Bell and Granisle mines in the Babine Lake area, and the Equity Silver Mine near Houston, demonstrate that acid rock drainage, metal leaching and mine-impacted water can create environmental management obligations

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that continue for decades after mining has ceased. The Highland Valley Copper Mine further illustrates the ongoing challenges associated with tailings storage facilities, seepage management and the protection of groundwater and connected surface waters, even where substantial engineered infrastructure and monitoring systems are in place. Most significantly, the Mount Polley tailings storage facility failure demonstrates that deficiencies in geotechnical investigation, facility design and water management can result in catastrophic releases, with consequences extending well beyond the mine site and requiring extensive remediation and ongoing environmental monitoring.

Taken together, these examples demonstrate that the environmental liabilities associated with large-scale copper mining can be substantial, long-lasting and, in some circumstances, extremely difficult to reverse. They reinforce our concern that the Berg Project must be evaluated not only on the basis of its anticipated operating performance, but also on the possibility of long-term groundwater contamination, acid rock drainage, tailings seepage, containment failure and the need for ongoing water treatment and environmental monitoring after closure. The costs and responsibilities associated with these risks must be fully understood, independently assessed and financially secured before the Project is permitted to proceed. The surrounding watershed, its wildlife, aquatic habitat and existing commercial users should not be expected to bear the environmental or financial consequences of a mine whose long-term risks have been inadequately assessed or secured.

Accordingly, we formally oppose the Berg Copper Project in its currently proposed location and configuration and consider approval to be premature unless and until a rigorous, transparent and independent assessment demonstrates that its significant adverse effects can be avoided or reduced to acceptable levels.

We respectfully request that this submission be formally recorded, that Nanika Lake Outfitters Inc. be recognized as an affected stakeholder throughout the assessment process, and that we receive notice of future opportunities to review and comment on environmental and socioeconomic studies relevant to our guiding territory.

Thank you for considering our submission.

Sincerely,

Amos Rossworm
Nanika Lake Outfitters Inc.
Licensed Guide Outfitter – Nanika Lake Region