MEMORANDUM

To: File
From: NorZinc Site Team
Date: Wednesday, May 13, 2020

Re: Prairie Creek COVID-19 Status and Logistics Update May 11, 2020

NorZinc Ltd. (NorZinc or NZC) through its wholly-owned subsidiary Canadian Zinc Corporation (CZN) is pursuing the development of the Prairie Creek Mine (the Mine). In preparing this Memorandum, NorZinc has sought direction from a number of sources, including GNWT’s Protect NWT, WSCC, Transport Canada and other sources detailed in the References section. We would like to particularly thank the staff at Protect NWT who were extremely helpful over the past many weeks guiding us with our analysis.

This Memorandum includes an outline of travel restrictions that are preventing mobilization to site and the ability to manage site water during freshet. It also provides some information on how compliance with the water licence could be ensured during the 2020 season post-freshet but also identifies how compliance with the licence may be challenging – the main area being the assurance of safety of our employees in view of COVID-19.

The Memorandum should be read in conjunction with the NorZinc letter dated May 7, 2020 to ENR. That letter is not a repudiation by CZN of its responsibilities under the water license, but describes the many related factors, including reported studies that, despite decades of mine water discharge before CZN started treatment in 2006, the only effect detected on Prairie Creek downstream is a mild nutrient enrichment.

Background

NorZinc’s network of suppliers, service providers and seasonal workers are often a reliable component of annual field operations at the Prairie Creek Mine Site. However, the rise of COVID-19 to global pandemic status this year has put many of these connections at risk.

This document presents the current understanding of obligations, risks, and mitigations surrounding a potential 2020 Prairie Creek field water treatment program. The activities for spring and summer 2020 are entirely focused on water treatment, no other activities were anticipated until late summer 2020 at the earliest. The information herein is subject to change.
without notice and will be reviewed and updated regularly. **Worker safety is the highest priority, as is the safety of residents in the communities contributing to NorZinc’s workforce.**

Safety Concerns

NZC has historically sourced workers from both the NWT and other locations. Every year we have been able to access both local communities and non-NWT workers. This year is particularly difficult because there are no known cases of COVID-19 in the DehCho region but our non-NWT workers come from locations, some with significant cases of COVID-19. The NWT and Canada has in place self-isolation plans designed to protect individuals. We have a very small workforce and as described below both our local community members and supervisors from outside the NWT have expressed safety concerns despite the 14-day self-isolation process.

Successfully operating the Prairie Creek Mine Site necessitates the following critical components:

- Ability of workers to safely travel to/from the mine site
- Safety of workers while at the mine site
- Ability to bring supplies to the mine site (water treatment, medical, food, etc)

Among the current primary concerns of potential issues, they include the reluctance of workers to travel in close quarters with others on aircraft of all sizes, and the unreliable nature of air-only access to the mine site, where weather delays for 3-4 days are not unprecedented and risk delaying critical medical care in emergency situations. Currently social distancing on charter aircraft is impossible, due to small cabin size and the limited length of the airstrip at the Mine.

**Current Status**

After careful consideration of the current challenges (discussed further in this document), and concerns expressed by our employees, **NorZinc continues to be very concerned about the current ability to safely transport workers to the Mine and operate at the Mine Site in a manner that would not potentially compromise the safety of its workers due to COVID-19.**
In assessing the above, the following groups are involved in dictating relevant policy:

- **Government of Canada**, *insofar as:*
  - *International travel restrictions*

- **Department of Health and Social Services**, by way of **Protect NWT** and the **Office of the Chief Public Health Officer, GNWT**, *insofar as:*
  - *Public Health Orders*
  - *Domestic travel restrictions*
  - *Social distancing guidelines*
  - *Symptom monitoring and reporting*

- **Workers’s Safety and Compensation Commission (WSCC)**, *insofar as:*
  - *Workplace and individual employee risk assessments*

- **Transport Canada**, *insofar as:*
  - *PPE requirements for travelers*
  - *Personal identification requirements*

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**Ability of workers to safely travel to/from the minesite**

**International travel**

- The senior Site Manager, is the only worker expected to fall into this category
- **Mandatory 14-day self-isolation upon arrival**
  - Can be done anywhere in Canada, if location provides necessities of life and away from vulnerable individuals (65+ yrs old or compromised health)
  - May need to be done in city of entry
  - Not allowed to work or have visitors during isolation
  - Private transportation only during self-isolation, no public transport
- Non-medical face masks are required and must be provided by traveler
- Documentation should be on-hand describing the purpose for travel
- This individual has expressed strong reluctance towards international and domestic air travel, and would prefer to drive solo the 4,700km from Texas as a possible workaround.

**Domestic travel**

- **Flight availability is a critical issue**
  - No scheduled flights available to Fort Nelson until June 8th
  - Limited scheduled flights currently available to Fort Simpson
- Non-medical face masks are required and must be provided by traveler
- Documentation should be on-hand describing the purpose for travel
- Creative charter routes to reduce number of flight legs are possible, but at greater cost
- Employees have expressed desire to drive to Fort Nelson instead of flying
**Charters to/from mine site**
- Charter flights can travel direct to Prairie Creek, even from outside NWT
- All charter flights are expected to proceed as normal
- **Social distancing on charter aircraft is impossible**, due to small cabin size
  - Passengers will always be 20-80cm away from each other while on aircraft
- Non-medical face masks should be worn by passengers for their protection and for the pilot’s protection
- Creative charter routes to reduce number of flight legs may be possible, but at greater cost

**Arrival in NWT**
- Workers are required by GNWT to self-monitor and record their symptoms for 14 days before beginning travel
  - Record does not need to be submitted to government officials, but should be on-hand while traveling
- Mineral industry workers who do not show symptoms of COVID-19 are exempt from self-isolation requirements and may begin work immediately

**Arrival at Prairie Creek**
- Workers will be screened for symptoms by NorZinc H&S staff upon arrival
- Workers will provide 14-day symptom record to NorZinc H&S staff upon arrival

**General comments related to travel to/from Prairie Creek**

Health checks are standard procedure before boarding flights to and within Canada. Cough, fever, or difficulty breathing will result in denied boarding.

All air passengers to and within Canada are required to wear non-medical face masks and will be denied boarding if a mask is not in their possession. Masks may not be available at airports and so workers should have them on-hand before starting their journey.

Airlines will attempt to seat people as far from each other as possible. Air Canada passengers can elect to travel on a later flight if not comfortable with distance between other passengers, at no additional cost. Other airlines may have similar policies.

Some workers have already expressed apprehension regarding air travel during the current global pandemic, mostly due to difficulties associated with adequate social distancing.
Safety of workers while at the mine site

Before opening the mine site, NorZinc must complete a workplace risk assessment for its internal records. Risk assessments must also be completed for every employee before they arrive.

In addition, NorZinc must incorporate:
- Workplace social distancing protocols
- Minimizing the number of people at site
- Daily symptom screening of all employees at start of every shift
- Increased disinfection of all common areas, stairways, washrooms, etc
- Eliminate self-serve buffet-style dining
- Display signs indicating restricted areas and increased disinfection protocols

Discussions with the Camp Services Manager have highlighted the following additional recommended measures:
- Possible separation of washroom facilities between NWT and non-NWT workers
- Separate dining tables for NWT and non-NWT workers
- Installation of two handwashing sinks in dining area

Anticipated costs related to the above have already been incorporated into the 2020 Prairie Creek Operations budget.

Ability to bring supplies to the minesite

Water treatment supplies have been confirmed to have a 6-week lead time, in addition to a 1-week shipping time.

Grocery suppliers are currently being contacted by the Camp Services Manager to assess availability.

Delivery and courier companies are expected to be operating normally, but this has not yet been confirmed.

Since charter services are operating normally, there are no concerns at this time that materials delivered to primary charter points (Fort Simpson, NT and Fort Nelson, BC) would see further delays getting to Prairie Creek.
Next steps

- Assess specific equipment and supplies needed for on-site operations, such as hand sanitizer, face masks, industrial disinfectants, kitchen supplies, shields, etc.
- Assess need for supplies to be ordered and distributed to workers before starting travel
- Perform workplace risk assessment as required by WSCC
- Assess possibility to reduce flight legs with longer charter flights, and/or incorporating more land travel

Test kits for COVID-19 may become available in the future, and should be considered as part of NorZinc’s safety plan. Regarding this, the Mining Association of Canada (MAC) had this to say in an email newsletter on May 1, 2020:

MAC has recently become aware of limitations placed on the domestic access for the private sector to COVID test kits and that a Cabinet Committee is currently examining the broader issue of access to COVID related PPE, including test kits, outside of the health system as the country begins to make plans to re-open the economy. We have learned that essential businesses will most likely be given first access to PPE and test kits as soon as they are made available beyond the health system, with access for the rest of the economy to follow.

While advocacy groups will likely attempt to encourage regulators to consider mining an essential service for sake of being able to acquire COVID-19 test kits, this may not happen in a timely manner. As such, long-term health & safety plans cannot yet rely on the availability of COVID-19 tests becoming available.
References


https://www.wscn.ca/health-safety/covid-19