MEMORANDUM OF UNDERSTANDING

BETWEEN:

MINISTRY OF ENERGY, MINES, AND LOW CARBON INNOVATION, the ministry responsible for British Columbia's (BC) electricity, alternative energy, mining and petroleum resource sectors pursuant to the *Ministry of Energy and Mines Act* (British Columbia) RSBC 1996, c. 298, having an address at PO Box 9060 Station Provincial Government, Victoria, BC V8W 9E2

(hereinafter referred to as "EMLI")

AND:

PROVINCIAL AGRICULTURAL LAND COMMISSION, an administrative tribunal established pursuant to the *Agricultural Land Commission Act* (British Columbia), SBC 2002 under the Ministry of Agriculture, Food and Fisheries, having an address at 201-4940 Canada Way, Burnaby, BC V5G 4KG

(hereinafter referred to as the "ALC")

WHEREAS:

A. EMLI is the ministry responsible for BC's electricity, alternative energy, oil, natural gas and related infrastructure, and the Province's mining and mineral exploration sectors.

B. The ALC is the agency responsible for agricultural land within BC, including both Crown and private land, with the mandate of preserving agricultural land, encouraging farming in collaboration with other communities of interest, and encouraging local government, First Nations, the Province and its agents to enable and accommodate farm use of agricultural land and uses compatible with agricultural land in their plans, bylaws, and policies.

C. In some cases, a mining or extraction activity, including exploration or production, may be located or may be proposed to be located on land within the Agricultural Land Reserve (ALR). In such cases, EMLI and the ALC have concurrent jurisdiction.

D. Section 2 of the Agricultural Land Commission Act gives the Agricultural Land Commission Act precedence over, but does not replace other legislation and bylaws that may apply to land. Local and regional

governments, as well as other Provincial agencies, are expected to plan in accordance with the Provincial policy of preserving agricultural land.

E. EMLI Regional Offices review applications for mineral and coal exploration activities, placer mines, industrial mineral mines, and aggregate pits/quarries through Notice of Work (NoW) applications and issue Mines Act permits for lands across the Province of BC. Such permits may require a financial security in order to ensure reclamation is completed once the mining activities have ceased, and to provide for protection of, and mitigation of damage to, watercourses and cultural heritage resources affected by the mine.

F. The ALC either permits outright, requires the submission of a Notice of Intent (NOI) to the ALC Chief Executive Officer (CEO) or a delegate of the CEO, or requires the submission of an Application for Soil or Fill Use to the ALC Commissioners, for mining or extraction activities in the ALR. In reviewing an NOI or Application, the ALC issues a Decision. A Decision may require a financial security in order to ensure reclamation to an agricultural standard is completed once mining activities have ceased.

G. EMLI and the ALC both may require a financial security to ensure that reclamation is completed to either agency's standards.

H. The ALC's requirements to reclaim to an agriculturally capable standard would generally meet, or exceed, EMLI's reclamation standards and reclamation security requirements.

THEREFORE, the parties agree to enter into a non-binding Memorandum of Understanding (MOU) on the following terms:

Purpose and Scope:

1. The purpose of this MOU is to establish an understanding between the ALC and EMLI with respect to each party's responsibilities for mining and extraction projects which fall within the ALR, with the following objectives:

    i. To preserve lands within the ALR in accordance with the ALC's mandate;

    ii. To ensure that applicable notices or applications are submitted to each respective party;

    iii. To avoid redundancy in the reclamation securities required by each party;

iv. To achieve an improved level of service to the public;

v. To facilitate cooperation between EMLI and the ALC in which the objectives of each may be mutually achieved; and,

vi. To establish procedures for the implementation of the objectives.

2. This MOU is subject to all applicable legislation, including but not limited to the Agricultural Land Commission Act, the Ministry of Energy and Mines Act, the Mines Act, and the Environmental Management Act and to the regulations of all applicable statutes, including but not limited to the Health, Safety and Reclamation Code for Mines in BC.

3. The parties believe that the effect of this MOU will be that overall, EMLI's and the ALC's processes and associated reclamation securities for mining and extraction activities within the ALR will be better clarified than would otherwise be the case.

4. This MOU is not intended to be, and is not, binding on the parties and is intended only to serve as a statement of the parties' shared objectives.

Notices of Work Submitted to EMLI:

5. NOW's are submitted through FrontCounterBC, a service which assists proponents with licences, permits, registrations and other authorizations required to utilize the Province's natural resources.

6. NoWs are reviewed by EMLI Regional Offices with respect to eligibility for a Mines Act permit to explore for and develop the Province's mineral, coal, placer, quarry and aggregate resources.

7. NoWs are not submitted for mining and extraction projects initiated and used exclusively by the Ministry of Transportation and Infrastructure (MoTI) unless the project is a reviewable project under the Environmental Assessment Act.

8. Part 10 of the Health, Safety and Reclamation Code for Mines in BC (the Code) specifies standards for reclamation of mine sites, including: land use, land capability, long term stability, re-vegetation, growth medium, landforms, structures and equipment, dumps, watercourses, open pits, access roads, openings, drains, and others.

9. For regional mines, EMLI uses the *Regional Mine Reclamation Bond Calculator* to estimate an appropriate bond amount based on the project details. The *Regional Mine Reclamation Bond Calculator* gives an estimation that may be modified by the Inspector to account for site specific circumstances.

With respect to the purpose of this MOU, NoWs may be submitted to EMLI under three scenarios: (i) activities not requiring an NOI or Soil or Fill Use Application; (ii) activities requiring an NOI and (iii) activities requiring a Soil or Fill Use Application.

(i) For Activities Not Requiring a Notice of Intent or Soil or Fill Use Application:

10. In certain situations, the use of land within the ALR for mining or extraction activities does not require ALC referral or approval. This applies in the following situations:

    i. Surveying, exploring and prospecting for gravel or minerals (including placer minerals) if all cuts, trenches and similar alterations are restored to the natural ground level on completing the surveying, exploring or prospecting (as described in Section 19(b) of the ALR Use Regulation); or

    ii. Removing aggregate, if the total volume of aggregate removed from any single parcel is less than 500m^3 (as described in Section 26 of the ALR Use Regulation) so long as the following are completed:

        a. The disturbed area is rehabilitated in accordance with good agricultural practice as soon as reasonably practicable after either aggregate removal is complete (if the aggregate is removed as part of a continuous operation) or each stage of aggregate removal is complete (if the aggregate was not removed as part of a continuous operation); and

        b. The cultivable surface layer of soil is salvaged, stored on the parcel and available for rehabilitation.

(ii) For Activities Requiring a Notice of Intent to be Submitted to the ALC:

11. When placing fill or removing soil or aggregate (for reasons other than an "Exempted Activity" meeting the requirements of Section 35 of the ALR Use Regulation or the activities described in Part 11), a Notice of Intent (NOI) must be filed with, and the requisite fee must be paid to, the ALC CEO at least 60 days before engaging in the intended use. An applicant cannot proceed with fill placement or removal of soil until the activity has been approved by the CEO or a delegate of the CEO.

12. The purpose of an NOI is to seek authorization prior to lawful placement of fill or removal of soil or aggregate, and not as a mechanism to seek retroactive approval.

13. Within 60 days of submission of the NOI, the CEO or a delegate of the CEO must approve the placement of fill or the removal of soil or aggregate or issue a written order that the person stop or not engage in placing fill or removing soil or aggregate.

14. The CEO or delegate of the CEO may request further information within the first 60 days from when the NOI is received by the ALC. If additional information is requested, the applicant has 60 days to provide the requested information or the file will be cancelled. The 60 days for the CEO or delegate of the CEO to issue a response only begins once all requested items have been received.

15. If the CEO or delegate of the CEO does not issue a response within the 60 day period, the applicant may remove soil from or place fill on the agricultural land as described in the notice (except if "Prohibited Fill" is placed, as described under Section 36 of the ALR Use Regulation).

16. In response to the NOI, the CEO or delegate of the CEO will release an NOI Decision (Decision).

17. A person who receives an NOI approval may place fill or remove soil or aggregate provided they do so in accordance with the terms of that approval, which may involve reclamation requirements.

18. To ensure successful reclamation of a project area, the CEO or a delegate of the CEO may require financial security, such as insurance, a bond, or an Irrevocable Lettter of Credit (ILOC) be posted. The amount of security is at the discretion of the CEO or a delegate of the CEO, and is generally determined based on the size (hectares), the estimated reclamation cost, and the nature of the project. The ALC generally requires a reclamation security of approximately $20,000 per hectare.

(iii) For Activities Requiring a Soil or Fill Use Application to be Submitted to the ALC:

19. A Soil or Fill Use Application is submitted to the ALC in the following circumstances:

    a. If the applicant chooses to seek approval via an application rather than an NOI (whether partially through the NOI process or not);

    b. If the applicant chooses to seek approval via an application because the terms of an NOI are not satisfactory to the applicant;

    c. If an NOI is refused; or

d. If the placement of fill or removal of soil or aggregate has already commenced.

20. In response to the Soil or Fill Use Application, the ALC will release an Application Decision.

21. If a Soil or Fill Use Application is approved, the placement of fill or extraction of soil or aggregate must be undertaken in accordance with the terms of that approval, including reclamation requirements.

22. To ensure successful reclamation of the project area, the ALC may hold a financial security such as insurance, a bond or ILOC, generally determined based on the size (hectares), the estimated reclamation costs, and the nature of the project. The ALC generally requires a reclamation security of approximately $20,000 per hectare.

Responsibilities of EMLI:

23. Pursuant to Section 3 of the Agricultural Land Commission Act, for proposals on lands entirely within the ALR, where the proposed mining or extraction activity requires an NOI or a Soil or Fill Use Application to be submitted to the ALC, the EMLI Statutory Decision Maker (SDM) will consult the ALC prior to issuance of the Mines Act permit, and will not issue the Mines Act permit until such time that an ALC NOI or Application Decision has been released. The general timeline for consulting the ALC is outlined in Appendix A. The ALC may be notified by electronic mail at ALC.Soil@gov.bc.ca.

24. For proposals on lands partially within the ALR, where the proposed mining or extraction activity requires an NOI or a Soil or Fill Use Application to be submitted to the ALC, the EMLI SDM may proceed to issue a Mines Act permit prior to an ALC NOI or Application Decision for the area outside of the ALR only. Pursuant to Section 3 of the Agricultural Land Commission Act, the EMLI SDM will not issue a Mines Act permit for the lands within the ALR until such time that an ALC NOI or Application Decision has been released.

25. Where the proposal timeline exceeds the length of the term approved by an ALC NOI or Application Decision in Part 23 or Part 24, the EMLI SDM will align the Mines Act permit approval with the ALC NOI or Application Decision terms.

26. For lands within the ALR where the proposed mining activity does not require a NOI or a Soil or Fill Use Application to be submitted to the ALC (described in Part 10), the EMLI SDM may proceed to issue a permit under the Mines Act at

their discretion, may require a reclamation security at their discretion, and need not consult with the ALC before such permit issuance.

27. In review of a NoW application, the EMLI SDM may refer a Mines Act permit to the ALC for comment. A lack of response within the 30 day response period as outlined in s.10(3)(2) of the Code, shall not be construed as ALC approval for the proposal. An NOI or Soil or Fill Use Application is required, where applicable.

28. EMLI SDMs need not require additional reclamation security for activities addressed under the ALC's financial security.

29. Where the EMLI SDM considers that the ALC's financial security is not adequate, they may require additional reclamation security to address mining related reclamation activities.

30. For all mining NoW applications, with respect to lands within the ALR, the EMLI SDM will copy the ALC on their issuance of the Mines Act Permit. The ALC may be notified by electronic mail at ALC.Soil@gov.bc.ca.

31. Where the EMLI SDM is closing a Mines Act permit, including release of any associated financial security, the SDM will consult with ALC in advance of the closure. The ALC may be notified by electronic mail at ALC.Soil@gov.bc.ca.

Responsibilities of the ALC:

32. The ALC's financial security will cover (but is not limited to) preparation of the surface grade (measured as the top one metre of soil), including preparation of the seed bed, seeding or planting with appropriate agronomic species, and the installation of any other agricultural infrastructure that is required to ensure that the land has been improved for agricultural production (e.g. agricultural subsurface drainage).

33. For aggregate extraction projects, the ALC will require that the ALC's Best Management Practices for Aggregate Extraction are followed (see Appendix B).

34. For mining and extraction projects initiated by MoTI, which do not require the submission of a NoW to EMLI, the ALC's financial security will cover the costs of all reclamation activities.

35. For all mining and extraction activity proposals (in respect of NOIs or Soil or Fill Use Applications), the ALC will copy the applicable Regional EMLI Office and Mines Inspector on its Decision.

36. Where the ALC is releasing a financial security for a mining or extraction project, the ALC will consult with EMLI prior to the release of the financial security.

Terms of Agreement:

37. The parties agree to meet on an annual basis to examine the effectiveness of this MOU and may recommend amendments as required.

38. Any amendment to this MOU agreed to by the parties must be in writing and signed by the parties.

39. This MOU and any amendments are effective on the latest date they are signed by the Parties and remain in effect until:

    (a) a replacement MOU is signed between the parties; or,

    (b) a party notifies the other in writing that this MOU is no longer in effect.

40. Where differences arise between EMLI and ALC staff regarding the interpretation or adherence to the MOU that cannot be resolved by those staff, the matter will be referred to EMLI's Assistant Deputy Minister and the CEO of the ALC.

Appendices:

Appendix A: ALC and EMLI Process Flow Chart

Appendix B: ALC Best Management Practices for Aggregate Extraction

MINISTRY OF ENERGY, MINES, AND LOW CARBON INNOVATION per its Chief Permitting Officer:

George Warnock

George Warnock, Chief Permitting Officer

Date: September 15, 2021

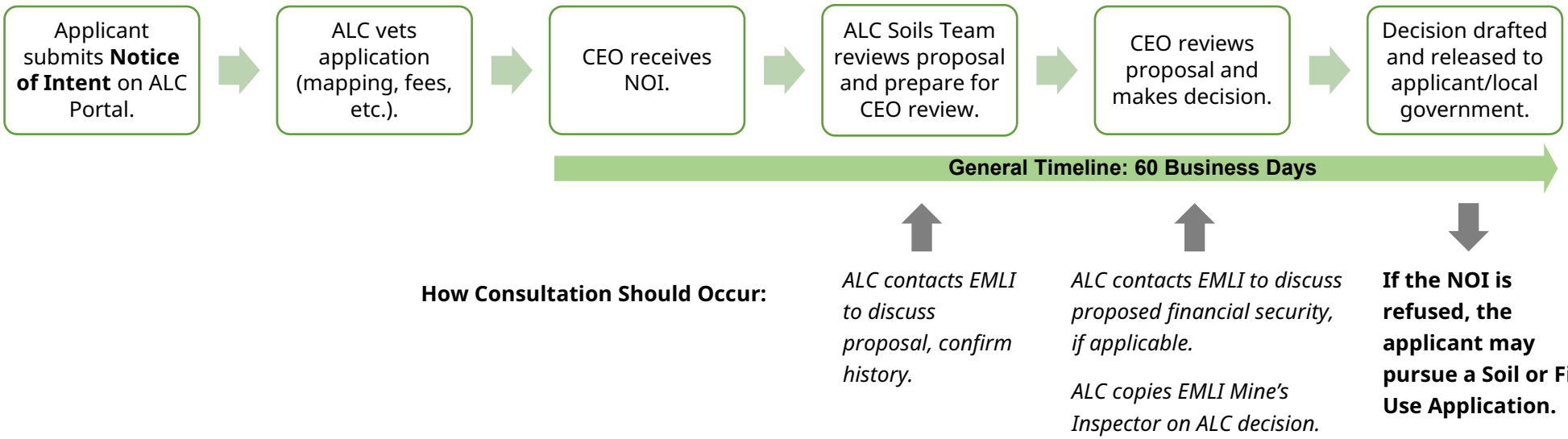
PROVINCIAL AGRICULTURAL LAND COMMISSION per its Chair:

Jennifer Dyson, ALC Chair

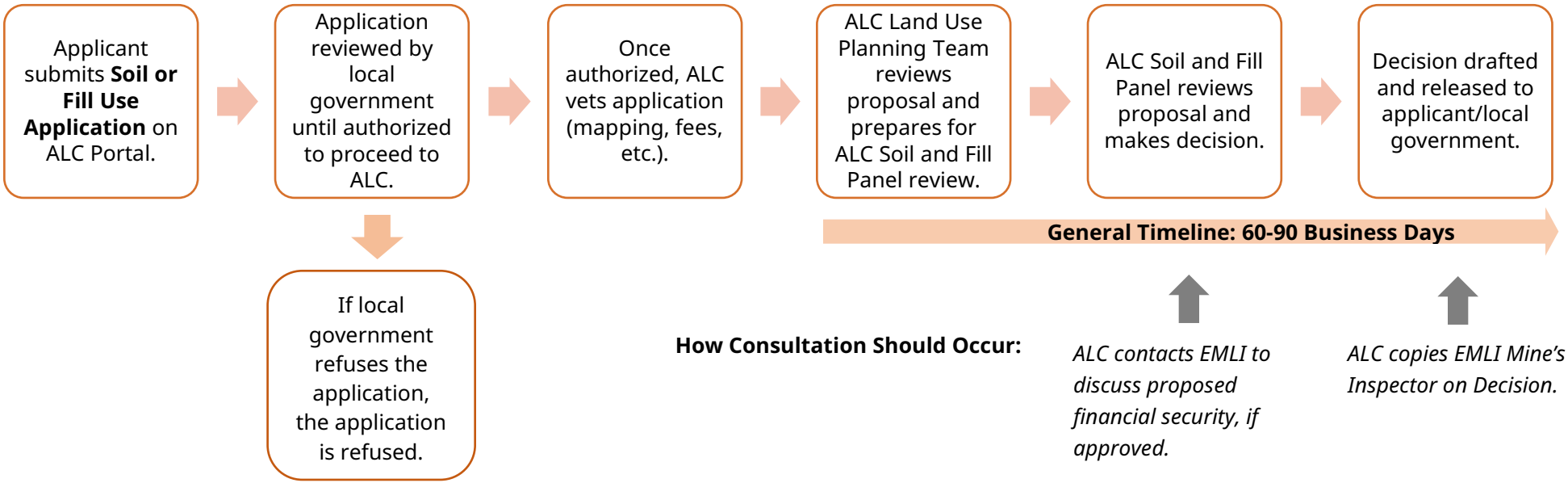
Date: September 22, 2021

APPENDIX A: ALC AND EMLI REVIEW PROCESSES FOR MINING AND AGGREGATE EXTRACTION PROJECTS IN THE ALR

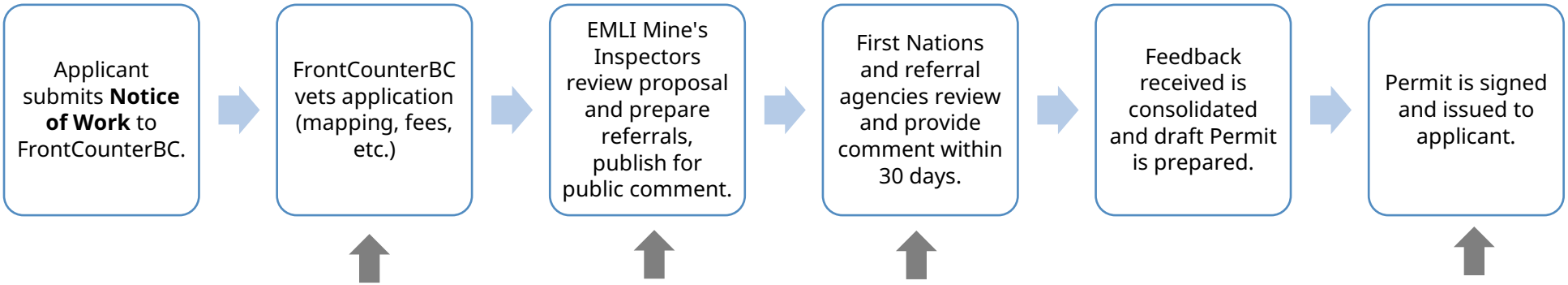
ALC NOTICE OF INTENT PROCESS



ALC SOIL OR FILL USE APPLICATION PROCESS



EMLI NOTICE OF WORK PROCESS



How Consultation Should Occur:

FrontCounterBC advises applicant of additional permits required (e.g. water licence, ALC NOI or application).

EMLI ensures applicant is aware of ALC NOI or application requirement.

EMLI may refer the NoW to the ALC; however, if no response is received within 30 days this shall not be construed as ALC approval.

EMLI shall ensure the ALC has been consulted prior to issuance of Permit and will not issue Permit until ALC NOI or Application Decision released, except in accordance with Part 26 of the MOU.

APPENDIX B:

BEST MANAGEMENT PRACTICES FOR AGGREGATE EXTRACTION ACTIVITIES OCCURRING IN THE AGRICULTURAL LAND RESERVE

Reclamation planning is essential to the successful reclamation of agricultural lands located in the Agricultural Land Reserve (ALR). The following document is intended to provide best management practices for aggregate extraction to both private landowners and industrial operations operating on private and Crown land in the ALR. This information should be used to assist in the development, operation, and reclamation of various scales of aggregate extraction operations ranging from small gravel pits and rock quarries to large, long-term industrial operations with multiple phases.

This document provides recommendations on:

- General operating conditions
- Soil management techniques
- Recontouring and subgrade preparation
- Soil placement (Topsoil/Subsoil)
- Seedbed preparation and surface rehabilitation
- Drainage and water management
- Weed management
- Project closure

GENERAL OPERATING CONDITIONS

- Soil must not be salvaged, moved, stockpiled, or replaced during conditions of adverse soil moisture content including when the soil is frozen (to prevent slumping) or powdery dry.
- Compaction must be minimized by selecting soil materials with low clay contents for replacement in the root zone.
- The use of native material (salvaged topsoil and overburden) is preferable to the use of materials sourced from off-site to avoid potential issues with drainage and excessive stoniness in the upper soil profile.
- Surface drainage from the reclaimed area must be maintained at all times in order to prevent erosion, flooding, siltation or other degradation of soils, adjacent lands or waterways.

- Any run-off must be diverted into catchment ponds or silt traps prior to discharge into natural watercourses or road ditches.
- On-site supervision by a qualified registered professional with expertise in soils and reclamation is required during the soil salvaging, stockpiling, storage and soil replacement process.

SOIL MANAGEMENT

Prior to any extraction, all existing topsoil must be salvaged under the direction of the qualified registered professional for use during reclamation. Additional salvaging of subsoil and overburden may be necessary on sites where backfill sourced from off-site is not readily available, topsoil is shallow or where there is limited overburden available. The recommendations for soil handling procedures are as follows:

- Soil must be salvaged from all of the following areas:
    - the proposed pit or quarry area;
    - the access roads; and,
    - the proposed stockpile areas for the subsoil and overburden.
- Topsoil, subsoil and any overburden must be salvaged and stored separately.
    - Separation between piles should be no less than 3 m
- Topsoil must be salvaged using an excavator with a clean-out bucket.
- Materials must be transported to an appropriately designated storage area that will not be disturbed by extraction activities in order to avoid double handling of materials.
- A uniform layer of bark mulch or sawdust should be laid down on the storage surface prior to placement of any salvaged material.
- The areas required for stockpile storage must be based on estimates of initial soil salvaging volumes.
- Stockpiled soils must be windrowed and located in an area where they will not be disturbed and will not impede site drainage.
- Drainage from, onto and around the stockpiles must be controlled by ditches, drains or intercepts as required.
- Stockpiled soil must not be removed from the property without written permission from the ALC.
- Salvage piles should be limited in height (2 to 3 meters). Higher piles must not exceed a 3:1 slope (horizontal: vertical).

- Stockpiles must be seeded and established with an appropriate plant cover or other suitable soil erosion control measure must be applied to protect the stockpiles from wind or water erosion.

SUBGRADE PREPARATION

The Commission frequently requires the backfilling of pits to ensure that the final elevation is consistent with adjacent land and the property's relative original elevation. Therefore, once all extraction activities are complete, the pit should be filled with suitable material that consists of either the stockpiled overburden and/or fill sourced from offsite. Subgrade preparation must proceed as follows:

- If imported fill is used to backfill, the fill must have the following characteristics:
    - must be of mineral origin only (organic soils are not permitted as fill material but can be used as a top-dress);
    - have a coarse fragment content less than 5% with no boulders >25 cm in the top 1 meter of the soil profile;
    - the texture of the soil must be no coarser than loamy sand and no finer than silt loam.
- The following are considered prohibited materials and must not be used as fill:
    - concrete or demolition waste, including masonry rubble, concrete, cement, rebar, drywall, and wood waste;
    - asphalt;
    - glass;
    - synthetic polymer;
    - treated wood; and,
    - unchipped lumber.
- The final contours of the subgrade must be gently sloping in such a manner as to conform to the surrounding landscape.
- Depending on the site topography, any permitted side slopes and/or benches should be recontoured so that slopes are no steeper than 3.5H:1V (horizontal: vertical) to allow for use of farm equipment on the slopes. Steeper slopes may be allowed in some cases depending on the configuration of the field in order to maximize the amount of flat land (e.g., long narrow extraction pits).
- To avoid severe erosion of topsoil, land that is intended for the production of annual crops should have slopes no greater than 20H:1V or 5% slope (Class 1).

- In the Lower Fraser Valley and Metro Vancouver, the slopes must be less than 1% on cropland to minimize sheet and rill erosion.
- If necessary, upon completion of backfilling, the subgrade should be chisel plowed to a minimum depth of 60 cm in two directions at right angles.

SOIL REPLACEMENT

Once the subgrade materials have been regraded, available topsoil and/or other suitable soil materials must be used to provide a rooting bed for crops.

General Recommendations

- Any stockpiled soils must be replaced in the reverse order from which they were removed.
- The recommended soil profile should consist of (from surface to at depth):
    - 20 – 30 cm of topsoil;
    - 30 cm of subsoil;
    - 50 cm of free draining subgrade;
    - Overburden or backfill (variable thickness).
- The placement of stakes, flagged to the desired replacement thickness, must be employed to assist the machine operator.
- Soil materials should be end dumped and leveled with low ground pressure equipment, such as tracked bulldozers.
- Vehicles and equipment must be restricted to designated roads or routes, so that ripping and subsoiling activities can be limited to these specific areas.
- Random, repeated running of equipment over leveled areas must be minimized wherever possible.

Subsoil Placement

- If subsoil has been retained, the subsoil must be replaced in one lift.
- If fill is used as subsoil, then the fill must have a coarse fragment (fragments >2 mm diameter) content of less than 5% percentage and must not contain any boulders (rock fragments >25 cm).
- Once the subsoil is in place, roughening the subsoil surface is required to hold topsoil in place following initial placement.
- If compaction does occur, rip the affected areas to a depth of 60 cm or more with shanks spaced 60 cm apart and then cross rip perpendicular to the first direction.

Topsoil Placement

- Topsoil thickness should be equivalent what was present before disturbance.

- Coarse fragments must not be introduced in the top 25 cm of the soil profile.
- Prior to replacement of the topsoil, soils must be screened separately to remove coarse fragments.
- Where the percentage of the coarse fragment content by volume is less than 5%, screening is not necessary. The qualified registered professional must determine if screening is necessary.
- Screening must be carried out under appropriate soil moisture conditions.
- Topsoil should not be replaced in areas such as roads or wet depressions that will not be used for productive agriculture unless required for grass establishment for erosion control.
- If the native topsoil has been removed, then a 20 - 30 cm lift of imported topsoil must be uniformly spread over the disturbance area. The texture of the soil must be no coarser than loamy sand or finer than silt loam.
- A suitable organic matter should be top-dressed over the reclamation area. This organic matter may be added in the form of animal or poultry manure or as a cereal or forage cover crop and turned into the soil.

SEEDBED PREPARATION/SURFACE REHABILITATION

If the disturbance area is not immediately returned to agricultural use upon completion, a seedbed must be prepared, and the area(s) seeded with an appropriate agronomic species using cover crops when necessary to reduce erosion on slopes and fertilized. Seed preparation and surface rehabilitation must take place as follows:

- Till the seed bed just prior to seeding to minimize the time period in which the soil surface will be exposed to water and wind erosion.
- Tillage must be completed only under specific soil moisture conditions (not powdery dry or excessively wet).
- The following equipment is suitable depending on the specific soil conditions:
    - Tillage equipment – plows and discs that lift and invert the soil;
    - Cultivators and harrows that lift and stir without inverting the soil;
    - In situations where it is undesirable to mix thin topsoil with underlying subsoil (i.e. stony subsoil) use cultivators and harrows rather than plows and deep discs.
- Soil tillage should be carried out across (perpendicular to) slopes to reduce the slow runoff velocity and the potential for rill formation.
- The rate of application and type of seed mix and fertilizer is to be determined by the qualified registered professional.

- Cereal cover crops such as spring barley, oats, winter wheat or fall rye germinate and develop rapidly. If seeded in mid to late summer they provide cover by fall but will not generally set seed and will not take over the stand the following year if turned over before seed set.
- Fertilizer should be applied based on soil testing results.
- Use supplementary irrigation to establish and maintain a complete cover.

DRAINAGE/WATER MANAGEMENT

A drainage plan must be prepared for the site by a qualified professional to ensure that water is appropriately managed on and off site. Prior to the installation, drainage plans must be submitted to the Commission for review and approval. The drainage design layout must be completed by a drainage specialist who will oversee the installation. The following drainage and erosion control measures should be considered when designing the plan; however, this will vary depending on specific site conditions:

- Interceptor drains and grassed water runs to slow the velocity of runoff water and prevent erosion.
- Placement of toe slope drains to collect and remove seepage from the subsoil.
- Use of temporary diversion drainage on new areas of topsoil and seeded areas.
- Sedimentation impoundments to protect water quality in downstream areas. The size and location of impoundments is determined by runoff volumes, erosion rates, and required retention times.
- Installation of a soil drainage system (subsurface drainage as needed). This will depend on the end use and agricultural capability.
- Installation of a layer of porous drainage material to reduce the amount of water in the soil.
- The drainage must be installed upon completion of rehabilitation of each phase and prior to establishing any perennial crops other than forage.
- The reclaimed area must be monitored following re-seeding to determine if sufficient drainage has been provided. If poorly drained areas persist, it may be necessary to install additional drainage structures.

WEED MANAGEMENT

- Weed control must be practiced at all times.
- Weeds must be controlled before seed set. The most common practices include:

    - Cultural methods such as reseeding with an appropriate vegetative mix that can out-compete weeds;
    - Mechanical methods such as tillage, mowing, mulching or use of black plastic sheeting; and,
    - Chemical methods such as the use of herbicides.
- All newly reclaimed areas must be reseeded as soon as possible after soil replacement.

CLOSURE

A report must be submitted to the Commission upon the completion of all reclamation works to ensure that the final land objective has been achieved and the agricultural capability and suitability of the site has been restored or improved. The report must include photographs and a written description of all aspects of the reclamation. The report is required to ensure that the operation has complied with all the conditions of the ALC approval. Reports must be completed by the qualified registered professional and must be completed after two full growing seasons. The specific requirements of the closure report will be outlined in the conditions of the ALC authorization.