

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

<b>BW Gold Project EAC #M19-01</b>					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
<b>EAC Condition #</b>	<b>Condition</b>	<b>Activity to fulfill condition requirement</b>	<b>Condition status: complete, ongoing, or to be initiated</b>	<b>Holder's Assessment of Compliance status: FP, IC, OC, OCC</b>	<b>Annual Report Component and Appendix ID:</b>
EAC Condition 5 <b>Compliance Verification and Reporting</b>	<p>The Holder must provide to the EAO and to the Aboriginal Groups any document, data or information requested by the EAO for the purposes of compliance inspection and verification. The Holder must provide any document, data or information requested within the timeframe and in the manner specified by the EAO. The Holder must submit a report to the attention of the EAO and Aboriginal Groups on the status of compliance with this Certificate at the following times:</p> <p>a) at least 30 days prior to the start of Construction;  b) on or before March 31 in each year after the start of Construction;  c) at least 30 days prior to the start of Operations;  d) on or before March 31 in each year after the start of Operations;  e) at least 30 days prior to the start of Closure;  f) on or before March 31 in each year after the start of Closure until the end of Closure;  g) at least 30 days prior to the start of Post-Closure; and  h) on or before March 31 in each year after the start of Post-Closure until the end of Post-Closure.</p> <p>The reports must be in a form satisfactory to the EAO. The EAO may adjust or extend this reporting requirement by providing written notice to the Holder.</p>	<p>a) January 2022 Compliance Report was provided 30 days prior to start of construction.  b) on August 18, 2022 EAO requested in writing that Condition 5 be updated and re-submitted because of the time that has passed since the January submission, and the status of compliance has changed on many of the conditions. EAO clarified that the report did not need to be provided 30 days prior to construction.  c) At EAO's request on Aug 18, 2022, a Condition 5 report was updated and submitted to EAO and Indigenous Nations on September 14, 2022.</p>	ongoing	IC	Appendix C5
EAC Condition 6 <b>Project Status Notification</b>	<p>The Holder must notify the EAO and Aboriginal Groups, in writing, at a minimum three months prior to, and no more than six months in advance of commencing, Construction, Operations, Closure, and Post-Closure. Should the primary contact for the Project change, the Holder must notify the EAO and Aboriginal Groups, in writing, within 30 days of such change and provide the physical address, email address and phone number(s) of the new primary contact.</p>	<p>A notification on project status - construction was circulated to the EAO and Aboriginal groups in writing on December 2, 2021. An additional notification on project status was circulated to EAO and Aboriginal Groups in writing on August 6, 2022.</p>	complete	IC	Appendix C6
EAC Condition 7 <b>Compliance Notification</b>	<p>The Holder must notify the EAO and Aboriginal Groups: a) as soon as practical; and b) in any event, no more than 72 hours, after the Holder determines that the Holder has not, or may not have, fully complied with this Certificate</p>	<p>There is an ongoing inspection of the site by EAO compliance and enforcement that was kicked off November 15, 2022. However, the inspection is not complete at the time of this report, so the determination of compliance related to the EAO inspection of the EAC is undetermined. A final report from EAO is expected in April 2023.</p>	complete	OCC	N/A
EAC Condition 8 <b>Transfer of Certificate</b>	<p>Transfer of Certificate a) Except as provided below, neither this Certificate nor any interest in it may be transferred to any person. This Certificate will be effectively transferred if the proposed Holder acknowledges that, upon transfer, it will be responsible for complying with the conditions of the Certificate, and both the proposed Holder and the Holder: i) obtain consent for the transfer from the Executive Director; ii) apply under section 19 of the Act for such amendments to this Certificate, if any, as the Executive Director deems necessary to ensure compliance with and enforceability of this Certificate and to otherwise reflect the proposed transfer; and iii) confirm by written notice to the Executive Director, within 14 days of the completion of all aspects of the transfer transaction other than this notice, that the transfer has been completed. b) An interest in this Certificate may be transferred by way of a grant of security to lenders or financiers without consent. c) A transfer of this Certificate to a trustee in bankruptcy, by a receiver or a trustee in bankruptcy pursuant to a court approved sale, or as part of a court approved arrangement under the Company Creditors Arrangement Act may occur without consent. If this Certificate is transferred without consent under paragraphs (b) or (c), the new and former Holder must notify the Executive Director within 30 days of the transfer and apply within the time specified by the Executive Director for any amendments to this Certificate that the Executive Director deems necessary to ensure compliance with and enforceability of this Certificate and to otherwise reflect the proposed transfer.</p>	<p>A Section 33 Order, transferring the Environmental Assessment Certificate to BW Gold for #M19-01 was approved on August 7, 2020.</p>	complete	IC	N/A
EAC Condition 9 <b>Transfer of Interest in the Project</b>	<p>a) Except in connection with the granting of security to Project lenders or financiers, prior to the Holder transferring a significant interest in the Project, the Holder and proposed transferee must: i) obtain consent for the transfer from the Executive Director; and ii) Apply under Section 19 of the Act for such amendments to this Certificate, if any, as the Executive Director deems necessary to ensure compliance with and enforceability of this Certificate and to otherwise reflect the proposed transfer. b) A transfer to a trustee in bankruptcy, by a receiver or a trustee in bankruptcy pursuant to a court approved sale or as part of a court approved arrangement under the Company Creditors Arrangement Act may occur without consent. If a significant interest in the Project is transferred without consent under paragraph (b), the Holder must notify the Executive Director within 30 days of the transfer and apply within the time specified by the Executive Director for any amendments to this Certificate that the Executive Director deems necessary to ensure compliance with and enforceability of this Certificate and to otherwise reflect the proposed transfer.</p>	<p>A Section 33 Order, transferring the Environmental Assessment Certificate to BW Gold for #M19-01 was approved on August 7, 2020.</p>	complete	IC	N/A

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EAC Condition 10 Document Submission Plan	The Holder must develop a plan for approval by the EAO identifying proposed dates or timelines for submission of every plan, program or other document required by this Certificate and for submissions made under Condition 26 (Water Quality Management). The plan must be developed in consultation with the Ministry of Energy, Mines and Petroleum Resources (EMPR), the Ministry of Environment and Climate Change Strategy (ENV), the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD), Northern Health Authority (NHA), Aboriginal Groups, the District of Vanderhoof, and Village of Fraser Lake. The Document Submission Plan does not apply to Condition 14 (Existing Disturbance), Condition 19 (the Environmental Monitoring Committee [EMC]), Condition 34 (Closure and Post-Closure Water Quality Management Plan), and Condition 43 (Mitigations Table Update). The Holder must provide the draft plan to EMPR, ENV, FLNRORD, NHA, Aboriginal Groups, the District of Vanderhoof, and the Village of Fraser Lake at least of 45 days prior to providing the draft plan to the EAO for review and approval, unless otherwise authorized by the EAO. The plan must be submitted to the EAO for review and approval at least 75 days prior to the first submission deadline in the Document Submission Plan, unless otherwise authorized by the EAO. The Document Submission Plan must demonstrate how the proposed dates or timelines align with any similar requirements in other provincial processes. The Document Submission Plan, and any amendments or updates thereto, will become the dates or timelines required for submission of plans, programs or other documents required by this Certificate once the plan is approved by the EAO, and thereby replacing the submission timelines set out in the applicable conditions.	Version 4.0 was formally submitted on March 18th, 2022.  Version 5.0 was submitted to EAO and Indigenous nations on June 30th, 2022 with a copy of comment and responses received on Version 4.  Version 6.0 of the Document submission Plan was submitted to EAO and Indigenous Groups on July 7, 2022 - the only change between v5 and v6 was an update to the date of the C&M plan submission to be in line with guidance provided by EMLI in a letter received from Lowell Constable on April 11, 2022.  Version 7.0 of the Document submission Plan was submitted to EAO, other applicable regulatory agencies and Indigenous Groups on November 18, 2022. No comments were received on DSP (v7) ; however, we did receive some clarification requests from Anna Huang with Northern Health. BW Gold requested approval of version 7.0 from EAO after the comment period had ended on December 20, 2022.	ongoing	IC	Appendix C10
EAC Condition 11 Care and Maintenance Plan	The Holder must retain one or more Qualified Professionals to develop a plan for Care and Maintenance. This plan must cover Care and Maintenance periods for both indefinite and definite time frames. The plan must be developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups. The plan must include, at a minimum, the means by which the following will be addressed: a) spill prevention and response for hydrocarbon storage and leaks and other accidental emissions from machinery or equipment; b) sediment and erosion control; c) management of tailings and waste rock; d) building maintenance; e) measures to monitor and mitigate adverse effects to wildlife; f) measures to monitor and mitigate adverse effects to receiving waters; g) measures to monitor, manage, and avoid build-up of water surplus to that required under Condition 33 (Mine Waste and Water Management Plan); h) the role of the Independent Environmental Monitor (IEM) required under Condition 12 and Aboriginal Group monitors required under Condition 17 during care and maintenance periods; i) access management; and j) a list of Documents required by this Certificate that this plan supersedes for as long as this plan is being implemented.  The plan must identify and describe how each condition in this Certificate will either: k) apply in full or in part during Care and Maintenance; or l) cease to apply during Care and Maintenance; and m) provide a clear rationale for any conditions proposed to cease to apply under paragraph l) or apply only in part under paragraph k).  The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups to the EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 60 days prior to Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.  This plan must be updated in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups prior to any Care and Maintenance period, unless otherwise authorized by the EAO. The plan and any amendments thereto, must be implemented during any Care and Maintenance period to the satisfaction of a Qualified Professional and to the satisfaction of the EAO.  The plan and any amendments thereto, must be implemented during any Care and Maintenance period to the satisfaction of a Qualified Professional and to the satisfaction of the EAO.	CSFN requested in February 2022 that BW Gold consider C&M water balance and water quality modelling scenarios. BW Gold submitted a proposed scenario and rationale for the C&M modelling to CSFN on February 21, 2022 and met with CSFN to discuss the proposed modelling on March 1. BW Gold received CSFN comments on the plan March 17, 2022. EMLI provided a letter to BW Gold on April 11 stipulating requirements for the C&M plan to be included as part of the MW's permitting process.  BW Gold presented the outcomes of the modelling to CSFN in a technical meeting on August 11. BW Gold then presented the outcomes of the meeting to the EMC on Aug 18 and then submitted the updated plan incorporating the outcomes of the modelling to the EMC on Aug 21, 2022.  On March 2, 2023 BW Gold received a letter of approval from EAO to implement the C&M Plan and revise based on any outcomes from the Major Works (MA/EMA) permit application review process.	ongoing	IC	<a href="https://blackwatergoldmine.com/resources/eac/condition-11-care-and-maintenance-plan.pdf?v=0.556">https://blackwatergoldmine.com/resources/eac/condition-11-care-and-maintenance-plan.pdf?v=0.556</a>  Appendix C11

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EAC Condition 12 <b>Independent Environmental Monitor</b>	<p>The Holder must retain the services of one or more IEMs. The IEM(s) must be a Qualified Professional, unless otherwise approved by the EAO, with a minimum of five years of experience in monitoring construction and environmental mitigation for major mining projects in British Columbia (BC). The IEM(s) will:</p> <p>a) observe, record for, and report to, the EAO and Aboriginal Groups on compliance with the Certificate; and,</p> <p>b) provide information to the EAO and Aboriginal Groups, EMPR, ENV, and FLNRORD, as directed by the EAO. Subject to any exceptions set out in the terms of engagement for the IEM(s), when providing information or reports to the EAO and Aboriginal Groups, the IEM(s) must not provide such information or reports to the Holder in advance of providing such information or reports to the EAO and Aboriginal Groups.</p> <p>The Holder must retain the IEM(s) throughout Construction, Operations, Closure and Post-Closure of the Project. The Holder must develop the terms of engagement for the IEM(s) in consultation with Aboriginal Groups, EMPR, ENV, and FLNRORD.</p> <p>No later than 60 days prior to the planned commencement of Construction, the Holder must submit to the EAO and Aboriginal Groups for review the name, organization, qualifications and relevant experience of the proposed IEM(s) and the IEM(s) terms of engagement.</p> <p>The Holder must not start Construction until the selection of the IEM(s) and the terms of engagement have been approved by the EAO.</p> <p>The terms of engagement must include, at a minimum, the following:</p> <p>c) the role, responsibilities and qualifications of the IEM(s);</p> <p>d) the roles, responsibilities and qualifications of any staff or other persons that will assist the IEM(s) with performing the IEM's roles and responsibilities (each an "IEM(s) Support");</p> <p>e) the nature and frequency of monitoring;</p> <p>f) the process whereby the IEM(s) or an IEM(s) Support will make recommendations to the Holder to take mitigative or corrective actions to address any non-compliance or potential non-compliance with this Certificate;</p> <p>g) the process by which the recommendations in section f) above will be communicated to the EAO, the Aboriginal Groups, and the Holder;</p> <p>h) the situations in which the IEM(s) will have the authority from the Holder to stop work on part or all of the Project if the IEM(s) determines that:</p> <p>i) The Holder has not, or may have not, complied fully with the requirements of this Certificate; and,</p> <p>ii) Stopping work is necessary to prevent or reduce Project-related adverse effects as determined by the IEM(s) or any IEM(s) support.</p> <p>i) the means by which the Holder, in consultation with Aboriginal Groups, EMPR, ENV, and FLNRORD may review the approved IEM(s) terms of engagement and submit a revised IEM(s) terms of engagement to the EAO for approval</p> <p>j) the provision of access to the Project Site so the IEM(s) can perform its duties, and the process by which that access will be provided;</p> <p>k) a process and protocols for inviting the Aboriginal Group monitors required by Condition 17 (Aboriginal Group Monitor and Monitoring Plan) in site inspections, including identification of circumstances under which those opportunities may be limited (if any) and how, in those cases, information will be provided to Aboriginal Group monitors following those inspections;</p> <p>l) the details of a Project phase completion report to be submitted to the EAO and Aboriginal Groups upon completion of each of Construction, Operations, Closure and Post-Closure phases. The reports must be written by the IEM(s) and include, but is not necessarily limited to:</p>	<p>BW Gold received an email from EAO on January 6th, 2022 inquiring about the IEM ToE status. BW Gold submitted an updated IEM ToE along with updated issues tracking tables (ITT) to EAO, Aboriginal Groups, FLNRORD, EMLI and ENV on January 21, 2022.</p> <p>BW Gold continued to meet with Aboriginal Groups (Jan 7, 14, 27, 2022) to further discussions on the implementation of the IEM ToE with EDI (The environmental consultant chosen to take on the role of the Independent Environmental Monitor).</p> <p>On August 15th, BW Gold received a draft letter from EAO approving the IEM TOE for review and comment. BW Gold responded to the draft letter on Aug 16th.</p> <p>On August 31st, BW Gold received a letter from EAO approving Condition 12.</p> <p>The IEM (EDI) completed monthly site inspections between October and December, 2022 during early works construction. The IEM also attended inspections from IAAC and EAO alongside the agency officers in November 2022. The IEM also provided a summary presentation of 2022 visits to the EMC on Feb 16, 2023.</p> <p>IEM reports from 2022 are included as Appendix C12.</p>	ongoing	IC	Appendix C12
EAC Condition 13 <b>Construction Environmental Management Plan</b>	<p>The Holder must retain one or more Qualified Professionals to develop a Construction Environmental Management Plan. The plan must be developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups. The plan must include, at a minimum, the means by which the following will be addressed:</p> <p>a) access management;</p> <p>b) invasive plants management;</p> <p>c) waste management;</p> <p>d) emergency response;</p> <p>e) human-wildlife conflict;</p> <p>f) visual resource management;</p> <p>g) erosion and sediment control</p> <p>h) spill prevention and response for hydrocarbon storage and leaks or other accidental emissions from machinery or equipment;</p> <p>i) metal leaching (ML) and acid rock drainage (ARD) management;</p> <p>j) geological and terrain hazards; and</p> <p>k) vegetation management.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD and Aboriginal Groups to the EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 90 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan and any amendments thereto, must be implemented to the satisfaction of the EAO.</p>	<p>On January 28, 2022, BW Gold received a letter from EAO regarding the CEMP and other 90 day plans. The letter instructed BW Gold to 'revise in response to comments from Aboriginal Groups and the EAO and resubmit to the EAO for approval prior to the commencement of Construction.</p> <p>There continued to be an ongoing dialogue consisting of meetings, comments and responses with both EAO and Indigenous Nations throughout winter 2022 and on May 24, 2022 BW Gold resubmitted an updated revision of the CEMP with updates completed in response to EAO, LDN and UFN and CSFN comments.</p> <p>On August 15th, BW Gold received a draft letter from EAO approving the CEMP for review and comment. BW Gold responded to the draft letter on Aug 16th. The draft approval letter also stated to 'Please resubmit the plan following any revisions that are made during the Mines Review Committee review of the Blackwater Gold joint permitting application.'</p> <p>On August 31st, BW Gold received a letter from EAO approving Condition 13. The CEMP was implemented for EW's construction in 2022, which started in late September. The CEMP 2022 annual report is included as Appendix C13.</p>	ongoing	IC	Appendix C13
EAC Condition 14 <b>Existing Disturbance</b>	<p>Within 90 days of the issuance of this Certificate, or as otherwise authorized by the EAO, the Holder must provide to the EAO and Aboriginal Groups a report documenting and describing all physical works and infrastructure built in the areas described in Schedule A to this Certificate, as of the date of this Certificate. The report must include:</p> <p>a) maps of the physical works and infrastructure at a scale sufficient to clearly document the location and area of disturbance for all physical works and infrastructure; and</p> <p>b) Photographs documenting all works and infrastructure.</p> <p>The report must be to the satisfaction of EAO</p>	<p>The Existing Disturbances report was submitted on September 20,2019.  <a href="https://projects.eao.gov.bc.ca/api/public/document/5e3481183bf9020021e3e2e1/download/Blackwater_ExistingDisturbanceReport_20190920.pdf">https://projects.eao.gov.bc.ca/api/public/document/5e3481183bf9020021e3e2e1/download/Blackwater_ExistingDisturbanceReport_20190920.pdf</a></p>	complete	IC	N/A

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EAC Condition 15 <b>Indigenous Cultural Awareness and Recognition</b>	<p>At least 90 days prior to commencing Construction in an Aboriginal Group's asserted or established traditional territory, the Holder must commence consultation with the Aboriginal Group to identify opportunities for cultural awareness and recognition.</p> <p>The Holder must offer opportunities to Aboriginal Groups that include, but are not limited to, holding ceremonies, installing signage, executing cultural protocols, recognizing cultural heritage, and providing cultural awareness training to Employees.</p> <p>If specific opportunities for cultural awareness and recognition are requested by an Aboriginal Group, the Holder must determine the scope and content of the cultural awareness and recognition opportunity and associated activities, in consultation with the Aboriginal Group and must support or conduct such activities, or must provide a rationale to the Aboriginal Groups explaining why a specific request or activity is not practicable, to the satisfaction of the EAO.</p>	<p>BW Gold sent a follow up letter in regards to condition 15 to LDN and UFN on December 17, and to NFN, NWFN, SFN and StFN on January 27, 2022.</p> <p>BW Gold met with UFN and LDN on January 3, 2022 to discuss the next steps in developing cultural awareness materials as well as a land blessing ceremony as part of condition 15.</p> <p>On January 31, 2022, BW Gold sent emails to LDN and UFN to set up a meeting to plan the ground-breaking/ Land blessing ceremony.</p> <p>Discussions on the land blessing ceremony continued through the winter and spring and the land blessing was then held at the project site with leadership representation from both LDN and UFN on August 9, 2022. UFN/LDN Leaders and Elders in attendance and leading ceremony on-site. Additionally a caribou offsetting plan video and cultural awareness video were filmed the same week as the land blessing ceremony and the videos are being edited for finalization.</p> <p>Mt. Davison monument sign developed acknowledging UFN/LDN territory. Welcome sign installed on mine site access road with recognition of UFN/LDN Ancestral Lands. Cultural awareness slides developed in collaboration with all Indigenous Nations to be presented to newly hired staff members. Cultural awareness video in production to also educate new staff members on cultural values, first draft expected Sept 13.</p> <p>Nov 30 - BW Gold provided UFN with link to Cultural Awareness video and land blessing video. Also provided photo release form</p> <p>December 14 - Held a meeting with both UFN/ LDN to discuss the finalization of the Cultural Awareness video.</p>	ongoing	IC	N/A
EAC Condition 16 <b>Aboriginal Group Engagement Plan</b>	<p>The Holder must retain a Qualified Person to develop an Aboriginal Group Engagement Plan. The plan must be developed in consultation with Aboriginal Groups.</p> <p>The plan must include at least the following:</p> <p>a) the means by which the Holder will engage with each Aboriginal Group on the implementation of the requirements of this Certificate during Construction, Operations, Closure and Post-Closure;</p> <p>b) the means by which the Holder will engage with each Aboriginal Group on the selection of the IEM(s);</p> <p>c) the means and timing by which Aboriginal Groups will be updated on the implementation of the requirements of this Certificate, including updates that are carried out to plans, programs or other documents required by this Certificate;</p> <p>d) the means by which the Holder will invite the Aboriginal Groups to provide to the Holder or the EAO their views on the updates set out in paragraph (c) or on the implementation of this Certificate generally, and specify a reasonable period during which the Aboriginal Groups may submit such views to the Holder;</p> <p>e) the means by which the Holder will maintain a record of such consultation including the matters discussed, responses, and resolution with Aboriginal Groups regarding the implementation of this Certificate; and</p> <p>f) the means and timing by which the Holder will provide a copy of such consultation record to Aboriginal Groups.</p> <p>In developing the requirements under paragraph (a), the Holder must determine with each Aboriginal Group, and include in the plan, the manner by which to engage with each Aboriginal Group, including:</p> <p>g) the methods of engagement;</p>	<p>On January 28, 2022, BW Gold received a letter from EAO regarding the AGEP and other 90 day plans. The letter instructed BW Gold to 'revise in response to comments from Aboriginal Groups provided to BW Gold between December 1, 2021, and February 1, 2022. Resubmit to the EAO for approval.</p> <p>Pursuant to Condition 1 a), BW Gold may proceed to implement the draft plan and commence Construction prior to approval by the EAO.'</p> <p>On April 3, 2022, BW Gold resubmitted the AGEP to EAO. The AGEP was revised in response to comments from Aboriginal Groups provided between December 1, 2021, and February 1, 2022. On April 19th, EAO provided BW Gold with a letter approving the AGEP. The approval states 'BW Gold may proceed to implement the plan. Please review and revise the plan in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) in accordance with timelines referenced in the Aboriginal Group Engagement Plan, Plan Review.'</p> <p>The AGEP was implemented for EW's construction in 2022, which started in late September. BW Gold has continued to engage Aboriginal groups on updates to management plans and by providing regular project updates, primarily through monthly meetings of the Environmental Monitoring Committee.</p> <p>BW Gold has been meeting with Indigenous Nation representatives and leadership individually to discuss environmental issues and implementation of plans including upcoming field work planned.</p> <p>BW also facilitated IEM meetings between the IEM and LDN and UFN in Q4 2022, as the construction activities were focused on the mine site, within LDN and UFN territories.</p>	ongoing	IC	N/A

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EAC Condition 17 <b>Aboriginal Group Monitor and Monitoring Plan</b>	<p>monitors must be retained throughout Construction, Operations and Closure. The scope of the monitor's activities will be related to monitoring for potential effects from the Project on the Aboriginal Group's Aboriginal Interests.</p> <p>The monitor must be approved by the Aboriginal Group and the Holder, unless otherwise authorized by EAO.</p> <p>The Holder is not required to retain a monitor or fund the retention of the monitor, during periods where there is no one willing or able to carry out the duties of a monitor on behalf of that particular Aboriginal Group.</p> <p>Any Aboriginal Group may notify the Holder and the EAO in writing that the Aboriginal Group wishes to have the same monitor as another Aboriginal Group, rather than each having separate monitors, as well as specifying the time-period or Project phase over which this would occur.</p> <p>The Holder must develop an Aboriginal Group Monitoring Plan. The plan must be developed in consultation with Aboriginal Groups. The plan must include at least the following:</p> <p>a) a process for determining whether any Aboriginal Group prefers that the Aboriginal monitor be retained by the Holder or by the Aboriginal Group;</p> <p>b) for monitors retained by the Holder, how the Holder will work with the Aboriginal Group(s) to identify, recruit and retain monitors through Construction, Operations and Closure; and</p> <p>c) for monitors retained by the Aboriginal Group(s):</p> <p>i) How the Holder will, on a regular basis, seek confirmation from the Aboriginal Group(s) that a monitor has been retained that is available to, and capable of, carrying out the activities in the terms of engagement; and</p> <p>ii) The process for the Holder to provide funding to the Aboriginal Group(s), including timing for provision of funds, in order for the Aboriginal Group to retain a monitor to conduct the activities set out in the Terms of Engagement.</p> <p>For all monitors, the Holder must develop a Terms of Engagement in consultation with Aboriginal Groups. The Terms of Engagement must include at least the following:</p> <p>d) the role and responsibilities of the monitor, including:</p> <p>i) the nature and frequency of the monitoring activities that will be conducted by the monitor, including the participation of the monitor in dam safety inspections and related activities, and activities during Care and Maintenance periods;</p> <p>ii) the means and methods by which monitoring activities are undertaken;</p> <p>iii) opportunities to collect samples from water, soil and other environmental media and have them analysed; and</p> <p>iv) participation in compliance inspections with the EAO;</p> <p>e) protocols for access to the Project and access to monitoring locations;</p> <p>f) The training, equipment and support that will be provided to the monitors to support the monitoring activities identified in paragraph d), including:</p> <p>i) safety equipment and training;</p> <p>iii) training prior to the Project phase where those activities will occur, or</p>	<p>Individual Aboriginal Group Monitoring Plans were prepared and submitted separately to Lhoosk'uz Dene Nation, Ulktacho First Nation, Nazko First Nation and the Carrier Sekani First Nations (Stellat'en, Saik'uz, Nadleh Whut'en). The draft plans and draft terms of engagement that were developed in consultation with Aboriginal Groups and were submitted to the EAO and Aboriginal Groups for review on December 29, 2021, a minimum of 60 days prior to the planned commencement of Construction.</p> <p>On February 18 2022 EAO provided BW Gold with a letter approving the AGMMP. The approval states 'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'.</p> <p>Indigenous group monitors were hired directly by BW Gold in Q4 2022 to support EW's construction. Two (2) monitors were hired, one from Lhoosk'uz Dene Nation and one from Ulktacho First Nation. The monitors are receiving several forms of training including but not limited to mines rescue, first aid, environmental monitoring. Discussions were also kicked off with CSFN and Naskzo about fulfilling the Indigenous monitor roles in those communities as well.</p>	ongoing	IC	Appendix C17
EAC Condition 18 <b>Cultural and Spiritual Resources Management Plan</b>	<p>and Closure phases. The plan must be developed in consultation with Aboriginal Groups, EMPR, ENV and FLNRORD. The plan must include at least the following:</p> <p>a) the types of historic, cultural and spiritual resources that will be addressed by the plan, including resources that are of cultural or spiritual significance to the Aboriginal Groups who may have cultural and/or spiritual resources in the Project Area;</p> <p>b) the process by which a Qualified Person is selected;</p> <p>c) how the Holder will consult and work with Aboriginal Groups to identify areas of cultural or spiritual importance that may be affected by the Project, and to determine whether the areas can be protected from impacts, or whether relocation of features of importance or activities under Condition 15 (Indigenous Cultural Awareness and Recognition) are needed to address effects;</p> <p>d) a chance find procedure that must include:</p> <p>i) mitigation measures to avoid or reduce adverse effects to chance finds;</p> <p>ii) training for Employees;</p> <p>iii) means and protocols for notifying Aboriginal Groups of finds, including maintenance of up to date contact lists for Aboriginal Groups;</p> <p>iv) means and protocols for involving Aboriginal Groups in the assessment of finds; and</p> <p>v) the means by which the Holder will document and make available to the relevant authorities any information the Holder has received from Aboriginal Groups on handling and storage of finds in consideration of any laws, customs or protocols identified by the Aboriginal Groups;</p> <p>e) the means by which the Holder will keep confidential any sensitive cultural, spiritual and/or site-specific information that the Aboriginal Groups have advised the Holder is considered confidential;</p> <p>f) the means by which the Holder will document the consultation in paragraph (c) with Aboriginal Groups and identify and implement measures in a manner that does not reveal confidential information on sites identified in paragraph e);</p> <p>g) means by which representatives and/or traditional knowledge holders from Aboriginal Groups will be involved in the implementation of the</p>	<p>On January 28, 2022, BW Gold received a letter from EAO regarding the C&amp;SR MP and other 90 day plans. The letter instructed BW Gold to 'revise in response to comments from Aboriginal Groups provided to BW Gold between December 1, 2021, and February 1, 2022. Resubmit to the EAO for approval prior to the commencement of Construction. Pursuant to Condition 2, please also include in the plan a schedule of proposed updates to the plan'</p> <p>On April 19th, 2022, BW Gold received a letter from EAO approving the CSRMP with the note to "BW Gold may proceed to implement the plan. Please review and revise the plan in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) in accordance with timelines referenced in the Cultural and Spiritual Resources Management Plan, Plan Revision."</p> <p>In fall 2022, BW Gold engaged with Archer (Archaeological consultant - HCA permit holder) and participation from UFN and LDN to complete an on site review/inventory of cultural sites within the planned disturbance footprint for the mine. A report summarizing the details of this 3-day field reconnaissance activity is included as Appendix C18.</p>	ongoing	IC	Appendix C18

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

<b>BW Gold Project EAC #M19-01</b>					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
<b>EAC Condition #</b>	<b>Condition</b>	<b>Activity to fulfill condition requirement</b>	<b>Condition status: complete, ongoing, or to be initiated</b>	<b>Holder's Assessment of Compliance status: FP, IC, OC, OCC</b>	<b>Annual Report Component and Appendix ID:</b>
EAC Condition 19 <b>Environmental Monitoring Committee</b>	<p>is provided to the EAO, unless otherwise authorized by the EAO. The purpose of the EMC is to facilitate information sharing and provide advice to the Holder on the ongoing development and operation of the Project, and the implementation of requirements in this Certificate, in a coordinated and collaborative manner. The Holder must invite the EAO, EMPR, ENV, FLNRORD and Aboriginal Groups to participate in all EMC activities. Where a condition of this Certificate requires the Holder to seek Aboriginal Groups' input on the review of a plan, program or other document, prior to developing the plan, program or other document, the Holder must offer to hold a meeting of the EMC to discuss key issues that should be addressed in the particular plan, program or other document. The Holder must convene such meeting if supported by members of the EMC. The Holder must develop an EMC Terms of Reference in consultation with the EAO, EMPR, ENV, FLNRORD and Aboriginal Groups. The Terms of Reference must include, at a minimum: a) the mechanisms by which the Holder will facilitate the effective participation of Aboriginal Groups; b) consideration of joint chairing of meetings with Aboriginal Groups or use of a mutually acceptable facilitator; c) the minimum frequency with which the Holder will canvass the EMC for topics to be discussed, and how the Holder will document topics raised and when and how they will be addressed with the EMC, or provide a rationale for why they will not be discussed; d) frequency, timing, and location of meetings; e) methods for documentation of EMC meetings and how meeting minutes or notes will be finalized with EMC members f) identification of other agencies or organizations whose mandates pertain to the topics potentially discussed by the EMC, including federal agencies, and who will be invited to join discussions on those topics; g) methods and means for the EMC to obtain relevant advice, technical support, and expertise; h) how the EMC can coordinate with provincial processes; i) an approach to regularly evaluate the effectiveness of the EMC, including a schedule for these evaluations; j) the means by which the Holder will coordinate the review of plans, programs or other documents required by this Certificate when review by some or all parties in the EMC is required by this Certificate; k) means by which the Holder will ensure the views of EMC members are fully canvassed and discussed amongst the EMC, and how the Holder will document how it has considered those views; l) how the following topics, at a minimum, will be addressed with the EMC, unless otherwise authorized by the EAO:</p> <ul style="list-style-type: none"> <li>i) status of implementation of the requirements of this Certificate;</li> <li>ii) results of ongoing environmental monitoring and adaptive management required by this Certificate, including all plans required by this Certificate, with the exception of the Community Effects Monitoring and Management Plan (CEMMP) (Condition 37) and the Health and Medical Services Plan (Condition 40);</li> <li>iii) potential non-compliances, and potential for non-compliances, with this Certificate;</li> <li>iv) if an initial dilution zone is being proposed in relation to Water Quality Management (Condition 26), the proposal and rationale for that proposal;</li> <li>v) water balance modelling to facilitate understanding of the Holder's management of water surplus to mine operation needs;</li> <li>vi) Project tailings storage facilities (TSF) design, operations, and monitoring of the TSF for structural safety and limiting the amount of water stored that is surplus to mine operation needs;</li> <li>vii) water management during Closure planning;</li> <li>viii) surface water and groundwater quality management and updates to modelling;</li> <li>ix) remediation measures for accidents and malfunctions;</li> </ul>	<p>The EMC was established on August 12, 2020.</p> <p>Draft terms of reference (TOR) for the EMC were provided to the required parties for review on September 10, 2020.</p> <p>The TOR that were developed in consultation with EAO, EMPR, ENV, FLNRORD and Aboriginal Groups were provided to EAO, EMPR, ENV, FLNRORD and Aboriginal Groups on February 9, 2021.</p> <p>EAO responded to the draft TOR for the EMC on April 12, 2021 and requested that BW Gold take additional time to work with the CSFNs to see if outstanding concerns can be addressed and accepted by other EMC members.</p> <p>An updated draft TOR was provided to EAO, EMPR, ENV, FLNRORD and Aboriginal Groups on May 12, 2021.</p> <p>EAO acknowledged that BW Gold had met the request of the April 12, 2021 letter and approved the EMC terms of reference on November 5, 2021.</p>	ongoing	IC	N/A
EAC Condition 20 <b>Air Quality and Dust Management Plan</b>	<p>The Holder must retain a Qualified Professional to develop an Air Quality and Dust Management Plan. The plan must be developed in consultation with ENV, EMPR, NHA and Aboriginal Groups. The plan must include at least the following:</p> <ul style="list-style-type: none"> <li>a) the means by which the mitigation measures identified in the Mitigations Table required under Condition 43 for the valued component Air Quality will be implemented;</li> <li>b) the means by which guidance contained in EMPR's and ENV's guidance: Developing a Fugitive Dust Management Plan for Industrial Projects (May 2018, or as updated or replaced from time to time) is addressed;</li> <li>c) the identification and detailed descriptions of dust-emitting sources from the Project;</li> <li>d) the identification of environmental receptors to be monitored;</li> <li>e) a compliance monitoring program, including the locations of monitoring stations and equipment that will be used to conduct the monitoring;</li> <li>f) the contaminants of potential concern (COPC) and corresponding concentrations (triggers) that would cause the Holder to take corrective action to reduce contaminant concentrations to avoid adverse health effects to receptors identified in paragraph d);</li> <li>g) how this plan will inform the Wildlife Management and Monitoring Plan (Condition 23), and Country Foods Monitoring Plan (Condition 41); and</li> <li>h) how the Holder will notify the EAO, ENV, EMPR, NHA, Aboriginal Groups, IEM, and the public in the event that contaminant concentration triggers identified in paragraph f) are exceeded. The notification must include both a technical report and a plain language summary of the technical report.</li> </ul> <p>The Holder must provide the draft plan that was developed in consultation with ENV, EMPR, NHA, and Aboriginal Groups to ENV, EMPR, NHA, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, and Closure and to the satisfaction of the EAO.</p>	<p>Feb 18th, 2022, BW Gold received a letter from EAO approving the plan.</p> <p>The AQFDMP was implemented for EW's construction in 2022, which started in late September.</p> <p>A 2022 annual report for the AQFDMP has been included as Appendix C20.</p>	ongoing	IC	Appendix C20

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

<b>BW Gold Project EAC #M19-01</b>					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
<b>EAC Condition #</b>	<b>Condition</b>	<b>Activity to fulfill condition requirement</b>	<b>Condition status: complete, ongoing, or to be initiated</b>	<b>Holder's Assessment of Compliance status: FP, IC, OC, OCC</b>	<b>Annual Report Component and Appendix ID:</b>
EAC Condition 21 <b>Noise and Vibration Effects Monitoring and Mitigation Plan</b>	<p>plan must be developed in consultation with EMPR, ENV, NHA, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) the means by which the mitigation measures identified in the Mitigation Table required under Condition 43 for the valued component Noise and Vibration will be implemented, including at least the following:</p> <ul style="list-style-type: none"> <li>i) locating Construction and Operations camps so that noise levels experienced by Construction and Operations camps residents from road and air traffic and mine equipment are consistent with triggers developed by a Qualified Professional that are protective of human health;</li> <li>ii) a description of how the development of triggers under a) i) took into account Health Canada's "Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise" (April 25 2017 or as updated or replaced from time to time);</li> <li>iii) how the Holder will minimize noise through the consideration of the type of aircraft used and frequency of flights; and</li> <li>iv) the means by which the Holder will provide to individuals or groups that could hear the blasts a schedule for the timing of blasting;</li> </ul> <p>b) the following specific mitigations:</p> <ul style="list-style-type: none"> <li>i) housing the pebble crusher and grinding circuits in insulated structures, and positioning equipment in sheltered or enclosed locations; and</li> <li>ii) limiting aircraft taking off or landing at the Project to daylight hours only;</li> </ul> <p>c) identification of noise receptor locations for monitoring programs;</p> <p>d) how and when monitoring will be undertaken;</p> <p>e) identification of the area where noise from the Project could be heard, and consultation with Aboriginal Groups regarding how different noise levels potentially affect their activities within the identified area and the mitigation measures to address those effects;</p> <p>f) identification of land users who may be affected by Project noise and how information related to Project activities and the potential for noise will be communicated; and</p> <p>g) the process, including timelines, for receiving and responding to noise complaints.</p> <p>The Holder must provide the draft plan that was developed in consultation with ENV, EMPR, NHA, and Aboriginal Groups to ENV, EMPR, NHA, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, and Closure and to the satisfaction of the EAO.</p>	<p>Feb 18th, 2022, BW Gold received a letter from EAO approving the plan.</p> <p>BW Gold completed construction phase monitoring at the locations outlined in the plan in November 2022. Please refer to appendix C21 - annual report for more details.</p>	ongoing	IC	Appendix C21
EAC Condition 22 <b>Caribou Mitigation and Monitoring Plan</b>	<p>Project's adverse effects on caribou and its critical habitat as defined in the Recovery Strategy for the Woodland Caribou, Southern Mountain population (Rangifer tarandus caribou) in Canada (Environment and Climate Change Canada (ECCC) 2014, or as updated or replaced from time to time). The plan must be developed in consultation with FLNRORD, ENV, EMPR, ECCC, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) the means by which the mitigation measures identified in the Mitigation Table required under Condition 43 for the valued component Caribou will be implemented;</p> <p>b) a requirement that during Construction the Existing Exploration Access Road (from its origin at the Kluskus-Ootsa Forest Service road to the Mine Site) and the Mt. Davidson Exploration Road, as identified in Figure A1-1 and A-2 of Schedule A to the Certificate, be decommissioned and caribou habitat disturbed by these roads be reclaimed in a manner that supports the reestablishment of caribou habitat;</p> <p>c) the type, timing and frequency for undertaking caribou surveys prior to commencement of Construction, as well as during Operations, and how that information will inform development and implementation of monitoring and mitigation measures during Construction and Operations;</p> <p>d) provision of survey results to Aboriginal Groups, FLNRORD, EMPR and ENV;</p> <p>e) scheduling Construction activities to take into account the caribou "least risk window" (as defined by Ungulate Winter Range Order U-7-012), including monitoring and implementation of management or mitigation measures to avoid or reduce impacts in the event caribou are observed in the area of the Project Site;</p> <p>f) the conditions under which work would be stopped if caribou are seen in the area during Construction;</p> <p>g) development and implementation of caribou awareness protocols for Employees;</p> <p>h) the timing and frequency, which must be at least once per year, unless otherwise authorized by the EAO, that the Holder will request to meet with FLNRORD and Aboriginal Groups to discuss opportunities for the Holder's Participation in provincial caribou regional initiatives and in initiatives related to caribou established under Section 5.2b).c. of the Hubulhsooninats'uhoot'ah: Foundation Framework Agreement (July 22, 2018, or as updated or replaced from time to time), between the Province and the Southern Dakelh Nation Alliance. When FLNRORD and/or Aboriginal Groups agree to meet, the Holder must organize such meeting; and</p> <p>i) the development of a work plan for the Holder's Participation in those initiatives identified in paragraphh) when invited to do so by FLNRORD or the Ministry of Indigenous Relations and Reconciliation.</p> <p>The plan must also include a plan to offset the loss of caribou habitat with recovery and protection of caribou habitat that will benefit the</p>	<p>BW Gold met with LDN, UFN, EMLI, FLNRORD and ECCC on January 26, 2022 to discuss the December 31, 2021 draft CMMP. Focus of the meeting was on monitoring.</p> <p>BW Gold received written comments on January 28, 2022 from ECCC on the December 31, 2021 version of the draft CMMP.</p> <p>BW Gold received a draft agreement for habitat securement from EMLI on January 28, 2022 and met with LDN, UFN, EMLI, FLNRORD and ECCC on the draft agreement later that day.</p> <p>BW Gold provided an updated section 4 of the draft CMMP to LDN, UFN, EMLI, FLNRORD, ENV and ECCC to review on January 28, 2022 after the parties agreed during the January 26 meeting that in the interest of time it would be helpful to share and collaborate on draft updates to the CMMP progressively.</p> <p>April 14th, 2022, BW Gold received an email from ECCC approving the CMMP (Federal DS condition 8.18).</p> <p>April 19, 2022, BW Gold received a letter from EAO approving the CMMP for implementation.</p> <p>Please refer to appendix C23 - annual report for more details.</p>	ongoing	IC	Appendix C23

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

BW Gold Project EAC #M19-01					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
EAC Condition #	Condition	Activity to fulfill condition requirement	Condition status: complete, ongoing, or to be initiated	Holder's Assessment of Compliance status: FP, IC, OC, OCC	Annual Report Component and Appendix ID:
EAC Condition 23 <b>Wildlife Management and Monitoring Plan</b>	<p>developed in consultation with EMPR, ENV, FLNRORD, ECCC and Aboriginal Groups. The plan must include at least the following:</p> <p>a) the means by which the mitigation measures identified in the Mitigations Table required under Condition 43 for the following valued components: Amphibians, Bats, Forest and Grassland Birds, Waterbirds, Furbearers, Grizzly Bear, Invertebrates, Moose, Ecosystem Composition and Plant species and Ecosystems at Risk will be implemented;</p> <p>b) the means by which the implementation and effectiveness of mitigation measures in the plan will be monitored;</p> <p>c) pre-construction surveys for wildlife features to be undertaken and the associated avoidance or mitigation measures to be undertaken if specified wildlife features are found in the Project Area, as listed in Table 1, including:</p> <ul style="list-style-type: none"> <li>i) the method(s), timing and duration for surveys and the related rationale for that method(s), timing and duration;</li> <li>ii) the identified measures to be undertaken in light of the requirements for different wildlife features; and</li> <li>iii) the circumstances under which the required measures in the Table 1 would not be implemented, if any, including a clear rationale for those exceptions and identification of alternative measures that will be applied.</li> </ul> <p>Table 1: Pre-Construction Surveys and Associated Avoidance and Mitigation Measures (INSERT TABLE HERE )</p> <p>d) the means by which information from the habitat suitability mapping for the Project Site will be confirmed or updated for the use of the Project Site by grizzly bears and moose prior to Construction at the Project Site, and in consultation with Aboriginal Groups. This must include:</p> <ul style="list-style-type: none"> <li>i) consideration of habitat identified through the Terrestrial Ecosystem Mapping of the Project Site contained in the Application and identification of the habitat types requiring further assessment;</li> <li>ii) identification of methods to be used to acquire the information, including consideration of applicable Resources Information Standards Committee guidance documents and other information made available to the Holder</li> <li>iii) the role of Aboriginal Group monitors or members of Aboriginal Groups in gathering the information;</li> <li>iv) after the information is gathered, an assessment of the adequacy of the mitigation measures proposed in the Mitigations Table required under Condition 43 in addressing the effects of the Project, in light of the new information gathered;</li> <li>v) if the assessment indicates that additional mitigation is required, the development of new or additional mitigations in a manner</li> </ul>	<p>August 31, 2022, BW Gold received a letter from EAO approving the plan.</p> <p>The WMMP was implemented for EW's construction in 2022, which started in late September.</p> <p>Please refer to appendix C23 - annual report for more details.</p>	ongoing	IC	Appendix C23
EAC Condition 24 <b>Wetland Management &amp; Offsetting Plan</b>	<p>functions caused by the Project, in consultation with FLNRORD, ENV, ECCC, EMPR and Aboriginal Groups. In this Condition, "wetland function" refers to the hydrological, ecological and wildlife lifecycle requirements provided by wetlands. The plan must include at least the following:</p> <p>a) the means by which the mitigation measures identified in the in the Mitigations Table required under Condition 43 for the valued component Wetlands will be implemented;</p> <p>b) a detailed description for each wetland that would be lost or altered as a result of the Project, including:</p> <ul style="list-style-type: none"> <li>i) an assessment of each wetland and wetland function that would be lost or altered based on Wetlands of British Columbia: A Guide to Identification (FLNRORD 2004, or as updated or replaced from time to time); and</li> <li>ii) the location and extent of these wetlands, including in relation to the local watershed;</li> </ul> <p>c) a description of the methods used to determine the functions and overall condition of wetlands;</p> <p>d) a description of the offsetting measures to be implemented by the Holder, including the amount and type of offsets required, the selection of offsetting sites, and a schedule and timeline for implementation of offsetting measures. The Holder is responsible for offsetting measures that compensate for expected losses of individual wetland functions described in (b);</p> <p>e) a description of how the plan applies the hierarchy of mitigation measures set out in the BC EMP;</p> <p>f) a description of how the selection of offsets took into account the extent to which the potential offsets would also provide additional habitat for grizzly bear and moose;</p> <p>g) a description of how input from Aboriginal Groups was considered in the identification and selection of potential locations for wetland offsets; and</p> <p>h) a description of how the implementation of the offsets and mitigation measures will be monitored for effectiveness.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, ECCC, and Aboriginal Groups to EMPR, ENV, FLNRORD, ECCC, Aboriginal Groups, and the EAO for review a minimum of 90 days prior to the planned commencement of Construction</p>	<p>On January 28, 2022, BW Gold received a letter from EAO regarding the WMOP and other 90 day plans. The letter instructed BW Gold to 'Revise in response to comments from Aboriginal Groups and the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD). provided to BW Gold between December 1, 2021, and February 1, 2022. Resubmit to the EAO for approval prior to the commencement of Construction. Pursuant to Condition 2, please also include in the plan a detailed schedule of proposed updates to the plan, including the type of information that will be added to the plan (e.g., update in 2022 with 2021/22 survey results). Pursuant to Condition 3, please ensure that the plan meets the requirements of Adaptive Management.'</p> <p>BW Gold worked with Indigenous nations to develop an RFP to complete updated wetlands baseline mapping of the transmission line and mine site in Q1-Q2 of 2022. A contract was awarded to Ecologic consulting and field work was completed between June - August 2022. Outreach meetings were held in September, October and November, 2022 to update all interested regulatory agencies and Indigenous community reps to inform all groups of the key findings from the baseline work program and forecast the updates to the WMOP that parties could expect to see with a resubmission of the plan. The outreach meetings were also an important way to get feedback on the baseline work and proposed offsetting measures. BW Gold also provided interested parties with an opportunity to provide feedback on the WMOP updates at regular monthly EMC meetings.</p> <p>BW Gold resubmitted an updated WMOP on December 16, 2022 to EAO and all required regulatory agencies and Indigenous nations. EAO issued a letter to BW Gold February 14, 2023, approving the updated WMOP with two key points of direction.</p> <p>1. Engage in consultation with Lhoosk'uz Dené Nation and Ulkatcho First Nation to continue to evaluate Dykam Ranch as an offsetting option and consider other wetland initiatives as alternatives to fulfill the offsetting objectives of the plan.</p>	ongoing	IC	Appendix C24

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

<b>BW Gold Project EAC #M19-01</b>					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
<b>EAC Condition #</b>	<b>Condition</b>	<b>Activity to fulfill condition requirement</b>	<b>Condition status: complete, ongoing, or to be initiated</b>	<b>Holder's Assessment of Compliance status: FP, IC, OC, OCC</b>	<b>Annual Report Component and Appendix ID:</b>
EAC Condition 25 <b>End Land Use Plan</b>	<p>the Health, Safety and Reclamation Code for Mines in British Columbia (June 2017, or as updated or replaced from time to time) at a minimum, for all disturbance areas within the Project Area, in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) a definition and description of the pre-mining land and water capability and land and water use conditions, using maps and tabular inventories, with respect to ecosystems and habitats and other uses in the area of the Project Area disturbances;</p> <p>b) a definition and description of the predicted post-closure land and water capability and land and water use conditions (based on changes that are expected to occur to topography and soil conditions due to mine development), using maps and tabular inventories, with respect to ecosystems and habitats, ability to exercise Aboriginal Interests and other uses for the Project Area disturbances;</p> <p>c) modelling, or other planning exercises, to reconcile or minimize differences between the pre-mining conditions (as per paragraph a) and post-mining projections (as per paragraph b) accounting for, but not limited to, Project design, terrain profiling and contouring, and optimization of soil conditions;</p> <p>d) documentation of the forecasted net changes in land capability between preand post-mining conditions and how any opportunities to improve land capability from its previous state were considered and incorporated;</p> <p>e) incorporation of mitigation targets related to valued components examined in the Application, including but not limited to wildlife and wildlife habitat, vegetation, and ecosystems, and monitoring for those targets; f) how the plan will take into consideration the Caribou Mitigation and Monitoring Plan (Condition 22), Wildlife Management and Monitoring Plan (Condition 23), Water Quality Management (Condition 26), and Wetland Management and Offsetting Plan (Condition 24); and g) consideration of how water quality may affect the Holder's ability to achieve the end land use.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups to the EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p>	<p>On August 28th, 2022 BW Gold submitted the ELUP to EAO, EMLI, FLNRORD and Indigenous Groups in accordance with the direction provided in EAO's letter to BW Gold on February 18, 2022, in response to comments from Aboriginal Groups and the EAO. BW Gold resubmitted the plan to the EAO for approval as per direction in their letter. This submission also included an Information-Tracking-Table (ITT) and a summary of consultation record. As per guidance from EAO in their letter from February 2022, the ELUP was provided as a stand-alone plan, separate from BW Gold's application for authorizations under other enactments.</p> <p>The ELUP was resubmitted to Indigenous Nations and EAO with responses to comments November 24, 2022.</p> <p>On March 2, 2023, BW Gold received a letter from EAO approving the ELUP for implementation with the direction to revise the plan in consultation with Lhoosk'uz Dené Nation and Ulkatcho First Nation and resubmit to the EAO six months following the completion of End Land Use workshops, no later than September 30, 2025, unless otherwise authorized by the EAO.</p>	ongoing	IC	N/A
EAC Condition 26 <b>Water Quality Management</b>	<p>a) During Construction, Operations, Closure, and Post-Closure, the Holder must ensure the Project does not cause downstream water quality to exceed BC Water Quality Guidelines, unless the Holder has developed and ENV has accepted one or more Science Based Environmental Benchmarks (SBEBs), in which case the accepted SBEB must not be exceeded. Downstream water quality includes water quality in, at a minimum, Davidson Creek and Creek 661, as monitored in accordance with paragraph (d) of this Condition.</p> <p>b) If the Holder develops SBEBs, these must be developed:</p> <p>i) in consultation with ENV and Aboriginal Groups;</p> <p>ii) in accordance with ENV's "A Framework for the Development and Use of Freshwater Science-Based Environmental Benchmarks for Aquatic Life in Environmental Management Act Permitting for Mines" (March 2016, or as updated or replaced from time to time); and</p> <p>iii) in consideration of Yinka Dene Water Law (YDWL) for Davidson Creek, and in consideration of any other water policies from Aboriginal Groups made available to the Holder for Davidson Creek and/or Creek 661; and submitted to the EAO, ENV and Aboriginal Groups within the time set out in Condition 10, the Document Submission Plan.</p> <p>c) If the Holder develops SBEBs, the Holder must produce a report that clearly documents how the YDWL and any other Aboriginal water policies referenced in paragraph b) iii) were considered in the development of SBEBs. Where site specific standards or metrics for YDWL for Davidson Creek or another Aboriginal Group's water policies for Davidson Creek and/or Creek 661 are made available to the Holder, the report must include a comparison of how the SBEB compares to those standards or metrics. The report must be provided to ENV, EMPR, EAO, and Aboriginal Groups in accordance with the time set out in Condition 10, the Document Submission Plan, and be to the satisfaction of the EAO.</p> <p>d) The Holder must monitor surface water quality at a location(s) determined by a Qualified Professional, in consultation with EMPR, ENV, and Aboriginal Groups.</p>	<p>On February 18 2022 EAO provided BW Gold with a letter approving the WQMP. The approval states 'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'.</p> <p>The 2022 SBEB Summary report has been included along with this report as Appendix C26.</p>	complete	IC	Appendix C26

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

<b>BW Gold Project EAC #M19-01</b>					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
<b>EAC Condition #</b>	<b>Condition</b>	<b>Activity to fulfill condition requirement</b>	<b>Condition status: complete, ongoing, or to be initiated</b>	<b>Holder's Assessment of Compliance status: FP, IC, OC, OCC</b>	<b>Annual Report Component and Appendix ID:</b>
EAC Condition 27 <b>Water Quality Report</b>	<p>Aboriginal Groups, ENV and EMPR. The report must include at least the following:</p> <p>a) a description of the water quality baseline available for the waterbodies listed in paragraph c) existing at the time the Certificate is issued, and any additional baseline collected for those waterbodies subsequent to the issuance of the Certificate. The description must include the locations, frequency and duration of sampling, and include consideration of YDWL, any other Aboriginal Group's water policies made available to the Holder, and guidance from ENV;</p> <p>b) clear documentation of how the baseline collection methods and scope compares to any methods specified in the YDWL, any other Aboriginal Group's water policies, and ENV guidance documents;</p> <p>c) water quality baseline for the following waterbodies:            i) Tatelkuz Lake;            ii) Davidson Creek;            iii) Chedakuz Creek at a location where Chedakuz Creek would be expected to be affected by mine effluent discharge into Davidson Creek; and            iv) a location downstream of the location in paragraph c)iii) where no further effects on water quality from the Project is predicted;</p> <p>d) the rationale for the selection of the locations for the collection of baseline information;</p> <p>e) a comparison of site-specific water quality metrics or standards developed by Aboriginal Groups under their own Aboriginal water policies to the modelled water quality at a point on Chedakuz Creek where water received from Davidson Creek is fully mixed into Chedakuz Creek.</p> <p>The Holder is only required to provide the information in paragraph e) if a Carrier Sekani First Nation has provided to the Holder the site-specific measures or standards developed under the YDWL, or if another Aboriginal Group has provided site-specific measures or standards under its Aboriginal water policy that are relevant for the location specified in paragraph e).</p> <p>The report must be provided to Aboriginal Groups, ENV and the EAO in accordance with the timelines set out in the Document Submission Plan set out in Condition 10.</p>	<p>The draft Water Quality Report that was developed in consultation with Aboriginal Groups was submitted to EMPR, ENV, FLNRORD and Aboriginal Groups as part of the joint MA/EMA permit application (Chapter 2, Appendix 2-K) on November 29th, 2021 as per the Condition 10 EAC document submission plan (DSP), and the same parties and EAO for review on January 21, 2022.</p> <p>On February 18 2022 EAO provided BW Gold with a letter approving the WQMP. The approval states 'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'.</p> <p>The 2022 annual has been included along with this report as Appendix C30.</p>	ongoing	IC	Appendix C30
EAC Condition 28 <b>Chedakuz Creek and Tatelkuz Lake Surface Water Quality Monitoring Plan</b>	<p>The Holder must retain a Qualified Professional to develop a surface water quality monitoring plan for Tatelkuz Lake and Chedakuz Creek upstream of the Nechako Reservoir. The plan must be developed in consultation with Aboriginal Groups, ENV and EMPR. The plan must include at least the following:</p> <p>a) monitoring locations;            b) frequency of monitoring;            c) the means by which the baseline information in Condition 27, Water Quality Report, and any other appropriate information or criteria as determined by a Qualified Professional, will be used to determine if there are adverse effects due to the Project to:            i) Tatelkuz Lake; and            ii) Chedakuz Creek upstream of Nechako Reservoir; d) how the Holder has considered YDWL, other Aboriginal policies made available to the Holder from Aboriginal Groups, and ENV guidance in development of the criteria in paragraph c)e) conditions, if any, under which monitoring would no longer be required; and            f) the means by which the Holder will communicate this information to Aboriginal Groups, including identification of the type of information to be provided, the frequency of reporting and the implications of the water quality observed at Chedakuz Creek for the Nechako Reservoir. Reports must include a summary written for a lay audience.</p> <p>The Holder must provide this draft plan that was developed in consultation with Aboriginal Groups, ENV and EMPR to the EAO, ENV, EMPR and Aboriginal Groups a minimum of 60 days prior to the planned commencement of Construction, or as or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Operations, Closure and Post-Closure, and to the satisfaction of the EAO.</p>	<p>On February 18 2022 EAO provided BW Gold with a letter approving the CC&amp;TLWQMP. The approval states 'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'.</p> <p>The 2022 annual has been included along with this report as Appendix C30.</p>	ongoing	IC	Appendix C30

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

<b>BW Gold Project EAC #M19-01</b>					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
<b>EAC Condition #</b>	<b>Condition</b>	<b>Activity to fulfill condition requirement</b>	<b>Condition status: complete, ongoing, or to be initiated</b>	<b>Holder's Assessment of Compliance status: FP, IC, OC, OCC</b>	<b>Annual Report Component and Appendix ID:</b>
EAC Condition 29 <b>Transmission Line Sedimentation Monitoring Plan</b>	<p>Holder must retain one or more Qualified Professionals to develop a plan to avoid sedimentation in waterbodies during construction and maintenance of the transmission line. The plan must be developed in consultation with ENV, FLNRORD, and Aboriginal Groups. The Plan must include at least the following:</p> <p>a) a requirement for the development of site-specific erosion and sediment control prescriptions for all transmission line construction and maintenance works that have the potential to impact YDWL Class 1 Waterbodies as set out in Appendix 1 and/or other waterbodies identified to be of cultural significance by other Aboriginal Groups, during transmission line construction and maintenance. The prescriptions must be prepared by a Qualified Professional who is also a Certified Professional in Erosion and Sediment Control (CPESC). The implementation of these prescriptions must be under the direction of a CPESC;</p> <p>b) prescriptions that detail the circumstances under which YDWL Class 1 Waterbodies and other waterbodies identified in paragraph a) (if any), will be monitored for turbidity and the specific monitoring methods that will be employed;</p> <p>c) monitoring for turbidity at a location upstream and a location downstream of Construction and maintenance activities;</p> <p>d) development of triggers for increases in turbidity as a result of the Project taking into consideration BC Water Quality Guidelines, YDWL and any policy provided to the Holder by other Aboriginal Groups that is relevant for the waterbodies identified in paragraph a) for turbidity;</p> <p>e) a description of how the Holder has considered the YDWL, other Aboriginal Groups' water policies applicable to the waterbodies</p> <p>f) the identification of mitigation and/or remediation measures in the event that such triggers in paragraph d) are met or exceeded, the timing of implementation of such measures, and monitoring of the effectiveness of such measures;</p> <p>g) criteria to determine when turbidity monitoring may be reduced and/or is no longer required;</p> <p>h) a requirement that all monitoring data and mitigation implementation be documented, retained, and provided to the EAO Compliance and Enforcement and Aboriginal Groups upon request; and</p> <p>i) a requirement that the Holder invite, and if the Aboriginal Groups' monitor is available, arrange for, Aboriginal Groups' monitors to be present during transmission line construction and maintenance activities at all locations where the site-specific erosion and sediment control prescriptions have been developed.</p> <p>The Holder must provide the draft plan that was developed in consultation with ENV, FLNRORD, and Aboriginal Groups to the EAO, ENV, FLNRORD, and Aboriginal Groups a minimum of 90 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The Holder must not commence Construction of the transmission line until the plan has been approved by the EAO, unless otherwise</p>	<p>The plan was submitted to Indigenous Nations for review June 28th, 2022. Comments were received and the plan was updated.</p> <p>The plan was re-submitted to EAO and Indigenous Nations with responses to comments November 29, 2022.</p> <p>EAO provided a letter to BW Gold on January 27, 2023 informing BW Gold that the November 29th version of the plan is not approved with direction to revise the plan in response to comments from Aboriginal groups and the EAO, provided to BW Gold by February 6, 2023 and resubmit to the EAO for approval prior to the commencement of the Construction of the transmission line.</p> <p>BW Gold is currently working on revisions to the plan.</p>	ongoing	FP	N/A
EAC Condition 30 <b>Aquatic Effects Monitoring Plan</b>	<p>consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups. The AEMP must include at least the following:</p> <p>a) a description of how the plan takes into consideration the YDWL and any other Aboriginal water policies made available to the Holder by the Aboriginal Groups;</p> <p>b) a description of the Project, associated activities, and study area;</p> <p>c) a conceptual model that describes the relationships between mining-related activities and potential effects on the aquatic environment;</p> <p>d) a description of the water quality issues and concerns with respect to the Project that exist in the vicinity of the Project Site;</p> <p>e) the objectives and a list of water chemistry, surface water toxicity, sediment chemistry, sediment toxicity, tissue chemistry, aquatic plant communities, aquatic invertebrate communities, fish communities, and aquatic-dependent wildlife communities;</p> <p>h) the means by which the data collected under the AEMP will be analyzed to determine the effects of the Project on the aquatic environment;</p> <p>i) means by which the AEMP will inform the Country Foods Monitoring Plan (Condition 41);</p> <p>j) a list of reports that will be prepared to disseminate the results of the AEMP, including a description of the proposed frequency, timing, structure, and content of each report. The reports must include a report that summarizes the results of the AEMP in language understandable to a lay audience; and</p> <p>k) the process and timing for sharing monitoring and study results, including the reports required under paragraph (j), with ENV, EMPR, FLNRORD, Aboriginal Groups and the EMC.</p> <p>The adaptive management aspect of this plan, as required under Condition 3, may be in a stand-alone section of this plan.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups to EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The AEMP, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, Closure and Post-Closure and to the satisfaction of the EAO questions the AEMP is intended to answer; f) a detailed description of the design of the monitoring program, including a list of assessment endpoints (for example, survival, growth, and reproduction of fish in receiving waters) and measurement endpoints (for example, surface water chemistry) that will be incorporated into the AEMP; g) a description of the locations, timing, and frequency of sampling for each of the measurement endpoints and metrics (e.g., concentrations of major ions in surface water) that will be included in the AEMP, including those for surface water chemistry, surface water toxicity, sediment</p>	<p>On February 18 2022 EAO provided BW Gold with a letter approving the AEMP. The approval states 'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'.</p> <p>The 2022 annual has been included along with this report as Appendix C30.</p>	ongoing	IC	Appendix C30

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

BW Gold Project EAC #M19-01					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
EAC Condition #	Condition	Activity to fulfill condition requirement	Condition status: complete, ongoing, or to be initiated	Holder's Assessment of Compliance status: FP, IC, OC, OCC	Annual Report Component and Appendix ID:
EAC Condition 31 <b>Tatelkuz Lake Protection Plan</b>	<p>The Holder must retain a Qualified Professional to develop a Tatelkuz Lake Protection Plan. The plan must be developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) when developing proposed water withdrawals for Tatelkuz Lake, the means by which the Holder will take into consideration that withdrawing water from Tatelkuz Lake to supplement flows for fish and fish habitat in Davidson Creek can have a negative effect on fish and fish habitat in Chedakuz Creek;</p> <p>b) the means by which the Holder will monitor and mitigate the effects of lake level drawdown on fish and fish habitat in the littoral zone, including habitat required to maintain and protect fish eggs;</p> <p>c) how winter withdrawals of water will be managed to avoid creating unsafe ice conditions on Tatelkuz Lake;</p> <p>d) the means by which the Holder will annually canvass Aboriginal Groups to determine which Aboriginal Groups would like information related to Tatelkuz Lake water levels and safety regarding the use of the lake when the lake is ice covered; and</p> <p>e) for any Aboriginal Group who identifies an interest in ice safety information as per paragraph d), provide a report on effects on ice safety on Tatelkuz Lake and offer to hold a winter ice safety event. The report and safety event must be within 45 days of receiving expressions of interest from Aboriginal Groups, unless otherwise authorized by the EAO.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD and Aboriginal Groups to the EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations and Closure and to the satisfaction of the EAO.</p>	This plan will be drafted by Qualified Professionals. The current Document Submission Plan (DSP v.7.0) reflects this plan being submitted '90 days prior to pumping water from Tatelkuz Lake'.	to be initiated	FP	N/A
EAC Condition 32 <b>Cyanide Management Plan</b>	<p>The Holder must develop a Cyanide Management Plan in consultation with EMPR, ENV, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) a description of how the plan is consistent with the Principles and Standards of Practice in the International Cyanide Management Code for the Manufacture, Transport, and Use of Cyanide In the Production of Gold (the International Cyanide Management Code, December 2016, or as updated or replaced from time to time);</p> <p>b) means by which cyanide-containing effluent will be monitored and treated prior to discharge, including discharge to the TSF;</p> <p>c) identification of cyanide concentrations that would trigger the need for additional effluent treatment; and</p> <p>d) management strategies to ensure that hydrogen cyanide gas stays below applicable human health thresholds.</p> <p>The Holder must provide the draft plan that was developed in consultation with ENV, EMPR, and Aboriginal Groups to EAO, ENV, EMPR, and Aboriginal Groups for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate. The plan, and any amendments thereto, must be implemented throughout Construction and Operations and to the satisfaction of the EAO.</p>	On February 18 2022 EAO provided BW Gold with a letter approving the CMP. The approval states 'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'.	ongoing	IC	N/A
EAC Condition 33 <b>Mine Waste and Water Management Plan</b>	<p>manage mine waste and water in a manner that is protective of the receiving environment. The plan must be developed in consultation with Aboriginal Groups, ENV and EMPR. The plan must include at least the following:</p> <p>a) the means by which the Holder will implement an oxygen-preventing barrier to cover waste rock, tailings and other mine by-products to prevent adverse effects from rock that is currently or potentially acid-generating or ML. The barrier may include coverage with additional tailings, water, or another mitigation measure that will be effective at limiting the potential for ML/ARD, as determined by the Qualified Professional(s);</p> <p>b) the means by which the Holder will limit the year-over-year accumulation of water stored in TSF that exceeds the amount necessary to:</p> <p>i) address water needed under paragraph a); and</p> <p>ii) meet the needs for the operation of the mill.</p> <p>This determination must be made by a Qualified Professional(s), taking into account safety and concerns expressed by Aboriginal Groups. The plan must identify whether treatment and discharge of water from the TSF during Operations was considered and if not, provide a rationale;</p> <p>c) the means by which the Holder will monitor and document the year-over-year water accumulation in the TSF;</p> <p>d) the management of ML/ARD from low grade ore stored on land during Operations, which must include placement of the ore on a low permeability foundation and collection, monitoring, and treatment of low grade ore contact water;</p> <p>e) a requirement that any remaining low-grade ore stockpile be backfilled into the pit or TSF at the end of Operations;</p> <p>f) identification of water treatment technology or technologies proposed to be used during Operations to treat pit water for discharge; and</p> <p>g) if any water treatment technology proposed for use during Operations differs from that proposed in the memo submitted as part of the Application (Document: Appendix F: Preliminary Design of Pit Sump and Pit Perimeter Dewatering Well Network Water Treatment Plan for the Blackwater Gold Project in Blackwater Gold Project: Updated Surface Water Quality Model Report (Aug 2016). Prepared by ERM), an assessment of how the new proposed technology achieves the same or better results as the technology proposed in the Application.</p>	<p>BW Gold provided a draft version of Plan 33 to Indigenous Nations and provincial agencies on April 28th, 2022. BW Gold received comments from CSFN (July 12), LDN and UFN (Aug 26) and presented on plan updates in Q3 2022.</p> <p>BW Gold provided responses to all comments received in an ITT by to Indigenous Nations on October 11, 2022.</p> <p>After submitting responses, BW Gold updated the plan based on the responses provided and re-issued a final copy of the plan on October 28, 2022 to EAO and Indigenous Nations for review and approval.</p> <p>On December 22nd, 2002, BW Gold received a letter from EAO approving the C33 Mine Waste and Water Management Plan</p>	ongoing	IC	Appendix C33

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

<b>BW Gold Project EAC #M19-01</b>					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
<b>EAC Condition #</b>	<b>Condition</b>	<b>Activity to fulfill condition requirement</b>	<b>Condition status: complete, ongoing, or to be initiated</b>	<b>Holder's Assessment of Compliance status: FP, IC, OC, OCC</b>	<b>Annual Report Component and Appendix ID:</b>
EAC Condition 34 <b>Closure and Post-Closure Water Quality Management Plan</b>	<p>must be developed in consultation with EMPR, ENV, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) continuation of mitigation measures identified in paragraphs a) and b) i) of Condition 33 (Mine Waste and Water Management Plan);</p> <p>b) identification of the proposed water treatment technology for use at Closure and Post-Closure, including:</p> <p style="padding-left: 20px;">i) whether and how the water treatment technology differs from the technology proposed in the Application (Document: February 15, 2017 Blackwater Gold Project: Water Treatment Responses for Comments 1266, 1270, 1271, 1272, and 1273);</p> <p style="padding-left: 20px;">ii) an assessment and identification of the timing for when the treatment is expected to be required, including identification of the factors considered in the assessment;</p> <p style="padding-left: 20px;">iii) identification and description of any new information available on the water treatment technology referred to in paragraph b) i) that could affect the conclusions in the environmental assessment on the effectiveness of the treatment or the confidence in the treatment being effective;</p> <p style="padding-left: 20px;">iv) if information in paragraph b) iii) indicates the water treatment technology will have a lower level of confidence or be less effective than identified in the Application, identification of the additional mitigation measures that will be applied; and</p> <p style="padding-left: 20px;">v) if new or changed water treatment technology is proposed in Closure or Post-Closure:</p> <p style="padding-left: 40px;">i. demonstration that the water treatment technology can achieve downstream water quality required by Condition 26 (Water Quality Management); and</p> <p style="padding-left: 40px;">ii. demonstration that the technology is technically feasible;</p> <p>c) description of how any water treatment by-products will be managed;</p> <p>d) the means by which the Holder will actively fill the pit with water in Closure to address ML/ARD;</p> <p>e) description of any additional monitoring, mitigation and/or management measures, additional to water treatment, needed to support the effectiveness of water treatment or achieving the water quality required by Condition 26, Water Quality Management, such as methods for maintaining adequate water quality in the pit lake; and</p> <p>f) identification of mitigation measures to limit seepage from TSF C from entering the TSF pond D such that seepage does not cause the quality of water discharged from TSF pond D to the receiving environment to exceed limits required by Condition 26 (Water Quality Management).</p> <p>The Holder must provide the this draft plan that was developed in consultation with EMPR, ENV, and Aboriginal Groups to EMPR, ENV,</p>	<p>This plan will be drafted by Qualified Professionals. The current Document Submission Plan (DSP v.7.0) reflects this plan being submitted 'At the time of the Holder's planned commencement of Operations'</p> <p>A post-closure water quality management plan is also required by the Mines Act Permit M-246 to be submitted 6 months prior to deposition of tailings into TSF Dam C so the requirements for the two plans may be harmonized into one document.</p>	to be initiated	FP	N/A
EAC Condition 35 <b>Tailings Dam Safety Transparency Plan</b>	<p>The Holder develop a Tailings Dam Safety Transparency Plan. The plan must be developed in consultation with EMPR, ENV, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) the identification and description of all types of reports, reviews, inspections and meetings pertaining to tailings dam safety that are produced, undertaken or held by the Holder;</p> <p>b) the frequency and anticipated timing for the materials and activities identified in paragraph a);</p> <p>c) how and when the information in paragraph a) will be provided to Aboriginal Groups in a timely manner;</p> <p>d) a description of how the Holder will invite the Aboriginal Groups' monitors identified in Condition 17 and other Aboriginal Group representatives to be included in the Holder's meetings and site inspections pertaining to tailings dam safety; d) the provision of an annual report, developed by a Qualified Professional, to the EAO, ENV, EMPR and Aboriginal Groups on dam safety, including changes to the status of the tailings dam and the status of ongoing investigations or actions being taken to address any safety issues. The report must include a summary written for a lay audience; and</p> <p>e) the provision of and timing for offering an annual dam safety meeting with Aboriginal Groups and EMPR.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, and Aboriginal Groups to EMPR, ENV, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Schedule required by Condition 10 of this Certificate.</p> <p>The plan, and any amendments thereto, must be implemented by a Qualified Professional throughout Construction, Operations, Closure, Post-Closure, and following Post-Closure, or as otherwise authorized by the EAO, and to the satisfaction of the EAO.</p>	<p>This plan will be drafted by Qualified Professionals. The current Document Submission Plan (DSP v.7.0) reflects this plan being submitted '90 days prior to the start of placing tailings or waste rock under water cover within the tailings storage facility.'</p>	to be initiated	FP	N/A

**Blackwater Gold**  
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Compliance self-report prepared by: Travis Desormeaux					
EAC Condition #	Condition	Activity to fulfill condition requirement	Condition status: complete, ongoing, or to be initiated	Holder's Assessment of Compliance status: FP, IC, OC, OCC	Annual Report Component and Appendix ID:
EAC Condition 36 <b>Accidents and Malfunctions Administration &amp; Communication Plan</b>	<p>Persons to develop a Accidents and Malfunctions Administration and Communication Plan for the Project. The plan must be developed in consultation with FLNRORD, EMPR, ENV, NHA, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) the means by which the Holder will acquire and maintain contact information for Aboriginal Groups, Tatelukus Indian Reserve 28, other nearby residents, local communities or other users of the area who could be affected by an accident or malfunction</p> <p>b) the types of accidents and malfunctions requiring notification by the Holder and the timeframe of notifications (including updates subsequent to the initial notification) to those identified in paragraph a);</p> <p>c) information to be included in the notifications required by paragraph b), including but not limited to:</p> <ul style="list-style-type: none"> <li>i) information on the accident or malfunction, including types and quantities of substances released, location of releases, duration of releases, and potential impacts caused by the release;</li> <li>ii) any health advisories;</li> <li>iii) remedial action being taken by the Holder including measures to avoid similar occurrences; and</li> <li>iv) details of subsequent monitoring related to the accident of malfunction;</li> </ul> <p>d) the manner by which those identified in paragraph a) will be notified by the Holder of an accident or malfunction;</p> <p>e) process for identifying and providing opportunities for those identified in paragraph a) to assist in response to the accident or malfunction;</p> <p>f) identification of any types of accidents and malfunctions that are not addressed in other plans, programs or other documents required by this Certificate or in provincial requirements for the Project, and mitigation measures to address potential adverse effects arising from those accidents or malfunctions; and</p> <p>g) requirements for the Holder to manage the risk of, monitor and report on Project Vehicle-related accidents, including but not limited to identifying:</p> <ul style="list-style-type: none"> <li>i) response measures for fires or explosions involving Project Vehicles;</li> <li>ii) safety measures to be followed by drivers of Project Vehicles; and</li> <li>iii) safety and emergency response equipment to be incorporated into Project Vehicles.</li> </ul> <p>The Holder must provide this draft plan that was developed in consultation with EMPR, NHA, ENV, FLNRORD, and Aboriginal Groups to FLNRORD, EMPR, ENV, NHA, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Schedule required by Condition 10 of this Certificate.</p>	<p>On February 18 2022 EAO provided BW Gold with a letter approving the AMCMP. The approval states 'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'.</p> <p>The AMACP was implemented during EW's in 2022 (Sept-Dec), however, there were no incidents at site triggering external reporting of an incident as required in the AMACP. Consequently, there is no standalone AMACP annual report for 2022.</p>	ongoing	IC	N/A
EAC Condition 37 <b>Community Liaison Committee and Community Effects Monitoring and Management Plan</b>	<p>on effects from the Project in the members' communities, to provide advice to the Holder on mitigation measures to address social and economic effects, and review and comment on the CEMMP and the plan's implementation.</p> <p>a) the Holder must develop a Terms of Reference for the CLC in consultation with the District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, NHA and the EAO.  The Terms of Reference must include at least the following:</p> <ul style="list-style-type: none"> <li>i) the communities or organizations that will be invited to be members of the CLC. This must include at least the following: District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, and NHA;</li> <li>ii) the mechanisms by which the Holder will facilitate the effective participation of CLC members;</li> <li>iii) the frequency with which the CLC will be canvassed for agenda topics and the means by which the Holder will provide responses to CLC members on those proposed topics;</li> <li>iv) the frequency of meetings and the means by which the locations of meetings will be selected;</li> <li>v) the means by which CLC members will be advised of the timing of and topics for proposed meetings;</li> <li>vi) the means by which meeting records will be kept and meeting notes made publicly available;</li> <li>vii) the means by which other agencies or organizations whose mandates pertain to the topics potentially discussed by the CLC will be identified and invited to join discussions on those topics;</li> <li>viii) the means by which the CLC will coordinate with the EMC (Condition 19) where similar or related topics are being considered;</li> <li>ix) the means by which the Holder will provide and document responses to issues raised at the CLC;</li> <li>x) the means by which the CLC will be asked to periodically review the implementation of the CEMMP; and</li> <li>xi) an approach to periodically evaluate the effectiveness of the CLC;</li> </ul> <p>b) The Holder must retain one or more Qualified Persons to develop a CEMMP. The Qualified Persons must each have a minimum of five years' relevant experience in the assessment and management of the social effects identified associated with major mines or industrial facilities. The CEMMP must include at least the following:</p> <ul style="list-style-type: none"> <li>i) identification of the communities likely to experience social or economic effects that are to be addressed in the plan;</li> <li>ii) the means by which additional communities would be identified and included in the plan should effects from the Project extend to other communities in the future;</li> <li>iii) a monitoring program for the following potential adverse effects from the Project on the communities identified in paragraphs b)</li> </ul>	<p>In 2022 CLC met 6 times (every 2 months). Meeting ongoing for life of mine.</p> <p>Baseline Survey completed in 2022.</p> <p>Annual report in progress to cover the Early Works period from Oct 2022 to March 31, 2023. Annual report draft for CLC committee to review July 2023, final report Q3 2023. Once we move into construction the timelines will reflect April 1, 2023 to December 2023, then annually after that.</p> <p><b>2022 Condition #38 Community Liaison Committee Activities</b></p> <p>February 23, 2022 - Community Liaison Committee meeting  April 20, 2022- Community Liaison Committee meeting  June 15, 2022- Community Liaison Committee meeting  August 17, 2022- Community Liaison Committee meeting  November 2, 2022- Community Liaison Committee meeting  December 7, 2022 -Community Liaison Committee meeting</p> <p>June, 2022 - Community Feedback Mechanism implemented and available for public comment input. Presented to CLC on June 15th.</p> <p>2022 - Qualified Person's (QPs) conducted a survey to collect baseline data for monitored indicators. Baseline report compilation to be completed in 2023.</p>	ongoing	IC	N/A

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

<b>BW Gold Project EAC #M19-01</b>					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
<b>EAC Condition #</b>	<b>Condition</b>	<b>Activity to fulfill condition requirement</b>	<b>Condition status: complete, ongoing, or to be initiated</b>	<b>Holder's Assessment of Compliance status: FP, IC, OC, OCC</b>	<b>Annual Report Component and Appendix ID:</b>
EAC Condition 38 <b>Tenure Holder Communication and Mitigation Plan and Report</b>	<p>and economic effects, and review and comment on the CEMMP and the plan's implementation.</p> <p>a) the Holder must develop a Terms of Reference for the CLC in consultation with the District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, NHA and the EAO.</p> <p>The Terms of Reference must include at least the following:</p> <p>i) the communities or organizations that will be invited to be members of the CLC. This must include at least the following: District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, and NHA;</p> <p>ii) the mechanisms by which the Holder will facilitate the effective participation of CLC members;</p> <p>iii) the frequency with which the CLC will be canvassed for agenda topics and the means by which the Holder will provide responses to CLC members on those proposed topics;</p> <p>iv) the frequency of meetings and the means by which the locations of meetings will be selected;</p> <p>v) the means by which CLC members will be advised of the timing of and topics for proposed meetings;</p> <p>vi) the means by which meeting records will be kept and meeting notes made publicly available;</p> <p>vii) the means by which other agencies or organizations whose mandates pertain to the topics potentially discussed by the CLC will be identified and invited to join discussions on those topics;</p> <p>viii) the means by which the CLC will coordinate with the EMC (Condition 19) where similar or related topics are being considered;</p>	<p>BW Gold will continue to seek to receive information and engage with the Tenure Holder both individually and through the Access Management Working Group, as it remains relevant to the Tenure Holder's interests.</p> <p>BW Gold continues to utilize the principles associated with the Practical Guide as an overarching reference. Without written reciprocal engagement from the Tenure Holder or documentation from the Ministry of Forests, BW Gold believes the Tenure Holder has made the business decision to no longer operate hunts in GTC 601039 area.</p> <p>Changes proposed to tenure-holder specific mitigations are noted in the Mitigations Section 2.0, and are proposed to take effect on March 31, 2023, unless feedback is received from the Tenure Holder to the contrary.</p> <p>Changes proposed to secondary mitigations are proposed to be removed from the tracking and reporting process since their primary reporting tool is located in a primary EAC Plan.</p>	ongoing	IC	Appendix C38
EAC Condition 39 <b>Final Transmission Line Routing Plan</b>	<p>must be developed in two phases.</p> <p>Phase 1 of the FTLRP must include at least the following:</p> <p>a) the means by which the Holder will consult with FLNRORD, Aboriginal Groups, existing tenure holders, permit holders, property owners, recreationalists, and other land users potentially affected by the transmission line routing options on the potential effects of the transmission line to those parties, including the means by which the Holder will identify the appropriate parties to be consulted;</p> <p>b) the mitigation measures to address potential impacts from the transmission line that will be proposed to the parties identified in paragraph a); and</p> <p>c) the means by which the Holder will notify the EAO, Aboriginal Groups and parties identified in paragraph a) of the final route selection.</p> <p>Phase 2 of the FTLRP must include at least the following:</p> <p>d) a report on the results of the consultation in paragraph a), which must include at least the following:</p> <p>i) how the consultation influenced the selection of the final route;</p> <p>ii) identification of the final route selection, including mapping at the same scale(s) as in Schedule A of this Certificate;</p> <p>iii) the extent to which mitigation measures address the potential effects; and</p> <p>iv) any changes made to mitigation measures to address concerns identified through the consultation in paragraph a).</p> <p>e) the means by which the mitigation measures for the valued component Visual Resources and Non-Traditional Land Use in the in the Mitigations Table required under Condition 43 will be implemented with respect to the full route of the transmission line, including the final routing option selected;</p> <p>f) the means by which the Holder will avoid impacts to recreational sites or to the use of recreation sites. Where the Holder is of the view that avoidance is not possible, the Holder must provide a rationale for why that is the case, and describe the mitigation measures that will be taken to limit the effects on recreation sites or their use;</p> <p>g) the specific mitigation measures developed to address issues identified in paragraph d); and</p> <p>h) with respect to the Stellako River Wildlife Management Area (SRWMA):</p> <p>i) how the mitigation measures have taken into consideration BC EMP in identifying the effects to the SRWMA and the means to avoid, minimize, restore on site, and offset impacts to the SRWMA; and</p> <p>ii) how the Holder has addressed any comments received by the FLNRORD Regional Manager responsible for the SRWMA.</p>	<p>BW Gold provided a draft Phase 1 FTLRP to ENV, FLNRORD for consultation on December 8, 2020.</p> <p>BW Gold revised the December 8 version of the draft Phase 1 FTLRP in response to comments and provided an updated draft Phase 1 FTLRP to EAO, ENV, FLNRORD and Aboriginal Groups, on February 17, 2021.</p> <p>BW Gold proceeded to implement the Phase 1 FTLRP 1 by providing requesting feedback on the TL routing options and by providing the mitigation measures to address potential impacts from the transmission line to FLNRORD, Aboriginal Groups, existing tenure holders, permit holders, property owners, recreationalists, and other land users potentially affected by the transmission line routing options on February 17, 2021.</p> <p>BW Gold considered feedback from FLNRORD, Aboriginal Groups, existing tenure holders, permit holders, property owners, recreationalists, and other land users potentially affected by the transmission line routing options and selecting a final routing. The final routing was communicated to required parties on October 20, 2021.</p> <p>The 2021 version of the FTLRP was reviewed by all required parties per the EAC and comments were provided. Meetings were held throughout 2022 and the FTLRP was re-submitted December 16, 2022 to EAO and Indigenous Groups for review.</p> <p>BW Gold received a letter from EAO on March 2, 2023 approving the plan.</p>	ongoing	FP	N/A

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

<b>BW Gold Project EAC #M19-01</b>					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g. pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
<b>EAC Condition #</b>	<b>Condition</b>	<b>Activity to fulfill condition requirement</b>	<b>Condition status: complete, ongoing, or to be initiated</b>	<b>Holder's Assessment of Compliance status: FP, IC, OC, OCC</b>	<b>Annual Report Component and Appendix ID:</b>
EAC Condition 40 <b>Health and Medical Services Plan</b>	<p>The Holder must retain a Qualified Person with a minimum of five years' experience in the planning and delivery of health care services in remote communities, unless otherwise authorized by the EAO, to develop a Health and Medical Services Plan. The plan must be developed in consultation with NHA, Aboriginal Groups, the District of Vanderhoof and the Village of Fraser Lake.</p> <p>The plan must include at least the following:</p> <p>a) identification of how the guidance from "Health and Medical Services Plan Best Management Guide for Industrial Camps" (Northern Health Authority, March 2015, or as updated or replaced from time to time) has been incorporated into the Health and Medical Services Plan and a rationale for any guidance from this document not incorporated;</p> <p>b) how the Holder will monitor drinking water quality at the Construction and Operations camps, including frequency of the monitoring, and the mitigation measures that will be applied if the monitoring results indicate exceedances of current BC Drinking Water Quality Guidelines;</p> <p>c) a description of the following:</p> <ul style="list-style-type: none"> <li>i) on-site health, and medical protocol and services to be implemented to meet the workforce's urgent and non-urgent health care needs;</li> <li>ii) disease and infection prevention and outbreak protocols; and</li> <li>iii) health promotion, and worker wellness program information (including but not limited to physical infrastructure, amenities and activities that are supportive of physical and mental health);</li> </ul> <p>d) description of a process for communication, coordination, and collaboration with the NHA, BC Ambulance Service and local health service providers on matters including, but not limited to patient care/transfer, data collection and reporting;</p> <p>e) description of how the Holder will monitor and report on the effectiveness of the plan; and</p> <p>f) description of how this plan relates and informs the plan required by the CEMMP in Condition 37.</p> <p>The Holder must provide this draft plan that was developed in consultation with NHA, Aboriginal Groups, the District of Vanderhoof, and the Village of Fraser Lake to NHA, Aboriginal Groups, the District of Vanderhoof, and the Village of Fraser Lake and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate. The plan, and any amendments thereto, must be implemented throughout Construction and Operations to the satisfaction of a Qualified Person and to the satisfaction of the EAO.</p>	<p>The plan, developed in consultation with NHA, Aboriginal Groups, the District of Vanderhoof and the Village of Fraser Lake, was submitted December 21, 2021, a minimum of 60 days prior to the start of construction.</p> <p>On August 31st, BW Gold received a letter from EAO approving Condition 40.</p> <p>BWG adopted a systematic approach of implementing the H&amp;MSP in 2022 by:</p> <ul style="list-style-type: none"> <li>a) Identifying the essential services/functions within the HSMP, including the on-site medical clinic, food and kitchen, Employee Assistance Program (EAP), sanitary, waste management, and pest management.</li> <li>b) Recognizing subject matter experts (SME) who can provide assistance and oversee these functions effectively.</li> <li>c) Establishing contractual agreements and pinpointing internal resources for managing these functions, while continuously monitoring performance to ensure optimal outcomes.</li> </ul> <p>Pls refer to Appendix C40 for more details.</p>	ongoing	IC	Appendix C40
EAC Condition 41 <b>Country Foods Monitoring Plan</b>	<p>consultation with EMPR, ENV, NHA, and the Aboriginal Groups.</p> <p>The plan must include at least the following:</p> <p>a) identification of all COPCs and related human health thresholds and triggers based on based on human health guidelines, as identified by a Qualified Professional;</p> <p>b) the means by which the Qualified Professional will work with the Aboriginal Groups to identify the specific country foods to be sampled through this plan;</p> <p>c) the means by which any sampling required by other plans required under this Certificate can also be used to inform the requirements of this plan;</p> <p>d) methods and locations for sampling COPCs, including quality assurance, quality control measures and sampling frequency. Unless addressed through sampling undertaken through other plans as identified in paragraph c), sampling methods must include at least the following:</p> <ul style="list-style-type: none"> <li>i) detection limits that are sufficient to compare to human health thresholds and triggers outlined in paragraph a);</li> <li>ii) reference sites that are not impacted by the Project;</li> <li>iii) air quality sampling and monitoring including: <ul style="list-style-type: none"> <li>i. criteria air contaminants;</li> <li>ii. dustfall, as outlined in Condition 20;</li> <li>iii. meteorological parameters;</li> </ul> </li> <li>iv) soil sampling, including: <ul style="list-style-type: none"> <li>i. co-location of samples with vegetation tissue samples in paragraph d) v);</li> </ul> </li> <li>v) vegetation tissue sampling, including: <ul style="list-style-type: none"> <li>i. co-location of samples with soil in paragraph d) iv);</li> <li>ii. selection of plant species to be sampled in consultation with the Aboriginal Groups;</li> </ul> </li> <li>vi) fish tissue sampling, including: <ul style="list-style-type: none"> <li>i. co-location of samples with water samples in paragraph d) vii);</li> <li>ii. selection of fish species to be sampled in consultation with the Aboriginal Groups;</li> </ul> </li> <li>vii) water quality sampling, including: <ul style="list-style-type: none"> <li>i. parameters that can influence metal uptake;</li> </ul> </li> </ul>	<p>The draft plan that was developed in consultation with NHA and Aboriginal Groups, was submitted to the EAO, EMPR, ENV, NHA, and Aboriginal Groups on December 20, 2021, a minimum of 60 days prior to the planned commencement of Construction.</p> <p>On February 18 2022 EAO provided BW Gold with a letter approving the CFMP. The approval states 'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'.</p> <p>BW Gold implemented the plan in 2022 with data collection being completed in Q3.</p> <p>BW Gold also consulted with LDN and UFN on the inclusion of a small mammal sampling component of the plan in 2022. A framework was developed and will be implemented during the sampling campaign in 2023. The 2022 annual has been included along with this report as Appendix C41.</p>	ongoing	IC	Appendix C41

**Blackwater Gold**  
**Condition 5: Compliance Verification and Reporting - 2023 Construction Compliance Report**

<b>BW Gold Project EAC #M19-01</b>					
Date of Compliance self-report: 31-Mar-2023					
Report timeframe (e.g, pre-construction, construction, operations, etc): Construction					
Compliance self-report prepared by: Travis Desormeaux					
<b>EAC Condition #</b>	<b>Condition</b>	<b>Activity to fulfill condition requirement</b>	<b>Condition status: complete, ongoing, or to be initiated</b>	<b>Holder's Assessment of Compliance status: FP, IC, OC, OCC</b>	<b>Annual Report Component and Appendix ID:</b>
EAC Condition 42 <b>Public Communications</b>	<p>The Holder must establish a publicly available website dedicated to communicating information about the Project, including but not limited to the following:</p> <ul style="list-style-type: none"> <li>a) project status;</li> <li>b) current versions of all plans that are or were required to be provided to the EAO in this Certificate, as well as final versions of programs and/or other documents, including final versions of updates to programs and/or other documents, required to be produced by this Certificate;</li> <li>c) a notification system that would allow interested parties to sign-up to be made aware of new website content or updates to the materials listed in paragraph b);</li> <li>d) a summary page that provides easy identification of and access to new content or updates of plans, programs or other documents noted in paragraph c);</li> <li>e) information on any public engagement activities related to the Project; and</li> <li>f) contact information for the Holder.</li> </ul> <p>The website must be established a minimum of 45 days prior to the planned commencement of Construction and must be kept up to date throughout Construction, Operations, Closure and Post-Closure and must be implemented to the satisfaction of the EAO.</p>	<p>The website was established and communicated as of January 16, 2022, a minimum of 45 days prior to the planned commencement of Construction.</p> <p>The website was maintained regularly in 2022. It can be accessed at:  <a href="https://blackwatergoldmine.com/eac-plans/">https://blackwatergoldmine.com/eac-plans/</a></p>	complete	IC	<a href="https://blackwatergoldmine.com/eac-plans/">https://blackwatergoldmine.com/eac-plans/</a>
EAC Condition 43 <b>Mitigations Table Update</b>	<p>The Holder must develop a Mitigations Table that captures all mitigation measures identified in the document Blackwater Gold Project: Summary of Proposed Mitigation Measures (November 6, 2018) (November Table) and the document Blackwater Gold Project: Master Mitigation Table September 28, 2018 (September Table) that will be incorporated into plans developed as a requirement of this Certificate with respect to the following valued components: Air Quality; Noise and Vibration; Caribou; Amphibians; Bats; Forest and Grassland Birds; Furbearers; Grizzly Bear; Invertebrates; Moose; Waterbirds; Wetlands; Visual Resources; Non-traditional Land and Resource Use; Ecosystem Composition and Plant species and ecosystems at risk. The mitigations to be considered for inclusion in the Mitigations Table include those listed under the column "Mitigation Measure" in the November Table, and those listed under the columns "Mitigation Measure", "Additional Information" and "Commitments made during Application/EIS Review" in the September Table.</p> <p>The Holder must also develop a report that identifies all mitigation measures in the November Table and September Table that are not included in the Mitigations Table and a clear rationale for why those mitigations are not included.</p> <p>The Mitigations Table and report must be developed in consultation with the EAO, Aboriginal Groups, FLNRORD and ENV.</p> <p>The Holder must provide the draft Mitigations Table and report developed in consultation with the EAO, Aboriginal Groups, FLNRORD and ENV to the EAO, Aboriginal Groups, ENV and FLNRORD no later than 180 days after the issuance of this Certificate, or as otherwise authorized by the EAO.</p> <p>The Holder must not commence Construction until the Mitigations Table and the report have been approved by the EAO, unless otherwise authorized by the EAO.</p>	<p>BW Gold provided the draft Mitigations Table and report developed in consultation with the EAO, Aboriginal Groups, FLNRORD and ENV to the EAO, Aboriginal Groups, ENV and FLNRORD no later than 180 days after the issuance of this Certificate, or as otherwise authorized by the EAO. The report (dated May 17, 2019) can be accessed at <a href="https://projects.eao.gov.bc.ca/api/public/document/5d0d32624d0f33001a9cefa4/download/Blackwater%20-%20Assessment%20Report.pdf">https://projects.eao.gov.bc.ca/api/public/document/5d0d32624d0f33001a9cefa4/download/Blackwater%20-%20Assessment%20Report.pdf</a></p> <p>On August 31st, BW Gold received a letter from EAO approving Condition 40.</p> <p>The mitigation table(used to develop all EAC Management Plans) has been added to the public website and is available here:  <a href="https://blackwatergoldmine.com/_resources/eac/Blackwater-Mine-Mitigations-Table-Condition-43.pdf?v=0.001">https://blackwatergoldmine.com/_resources/eac/Blackwater-Mine-Mitigations-Table-Condition-43.pdf?v=0.001</a></p>	complete	IC	<a href="https://blackwatergoldmine.com/resources/eac/Blackwater-Mine-Mitigations-Table-Condition-43.pdf?v=0.001">https://blackwatergoldmine.com/resources/eac/Blackwater-Mine-Mitigations-Table-Condition-43.pdf?v=0.001</a>

**Labels and Descriptions from: EAO Guide to Compliance Self-Reports (Feb 2018)**

**Compliance**

Status	Acronym	Description
Future Phase	FP	Use this label for a condition that applies to a future phase and work that has not started.
In Compliance	IC	Use this label for a condition where the work triggered by the condition is ongoing or complete and compliance with the requirements of the condition is proven up to the point in time that the report is submitted.
Out of Compliance	OC	Use this label for a condition where the project is currently out of compliance with requirements.
Ongoing Compliance Concern(s)	OCC	Use this label for a condition if you are having challenges achieving compliance; you are unsure whether your actions are achieving compliance, or you anticipate you will not be able to achieve compliance.

**Use Examples**

For example, a condition may be specific to the operations phase of a project. If the project is currently in construction and not yet in operations, 'future phase' may be an appropriate compliance label providing there are no requirements that must be completed in construction in order to achieve compliance in operations.

o When using this label, fully consider all work required for a condition. For example, if the condition is primarily for operations but consultation for the condition must occur prior to operations during the construction phase, this label may not be appropriate.

For example, a condition requires that a holder monitor various fish species before, during and after construction. If the holder has completed all required monitoring up to the point in time when the self-report is due, then "In Compliance" may be the appropriate compliance label.

Using the example above, 'out of compliance' may be the appropriate label if monitoring was completed, but the holder was unable to complete the post-construction monitoring for one species in the required timing window due to equipment failure.

o In addition to noting this issue in the self-report, notify EAO C&E of the non-compliance and planned actions to address it by sending an e-mail to [eao.compliance@gov.bc.ca](mailto:eao.compliance@gov.bc.ca). Take any additional actions for non-compliances as required by the certificate/exemption order.

For example, a condition may require consultation or work with another party. If the other party is not able to, or chooses not to meet with the Holder, 'ongoing: compliance concerns' may be the appropriate label.

o If this label is used, the holder should notify EAO C&E of the compliance concern and planned actions to address it by sending an e-mail to [eao.compliance@gov.bc.ca](mailto:eao.compliance@gov.bc.ca).

## **Acronyms Glossary**

BWG	Blackwater Gold
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
FLNRORD	BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development
QP	Qualified Professional
N/A	Not Applicable