



# Blackwater Mine



# Blackwater Gold Mine Annual DS Follow-Up Report

*January 1, 2025 – December 31, 2025*

## Executive Summary

The Blackwater Gold Mine (the Mine) is a gold and silver open pit mine currently under construction in central British Columbia (BC), approximately 112 kilometers (km) southwest of Vanderhoof, 160 km southwest of Prince George, and 446 km northeast of Vancouver. It is situated within the traditional territories of Lhoosk'uz Dené Nation, Ulkatcho First Nation, Skin Tyee Nation and Tsilhqot'in Nation. The Kluskus and Kluskus-Ootsa FSRs and Project transmission line cross the traditional territories of Nadleh Whut'en First Nation, Saik'uz First Nation, and Stellat'en First Nation (collectively, the Nechako First Nations) as well as the traditional territories of the Nazko First Nation, Nee-Tahi-Buhn Band, Cheslatta Carrier Nation and Yekooche First Nation.

Major mine components include a tailings storage facility (TSF), ore processing facilities, waste rock, overburden and soil stockpiles, borrow areas and quarries, water management infrastructure, water treatment plants, accommodation camps and ancillary facilities.

Development of the Mine is facilitated by a number of approvals, including a Decision Statement (DS) issued under the *Canadian Environmental Assessment Act, 2012* in April 2019. Condition 2.11 of the DS requires the development of an Annual Follow-up Program Report (FUP), including a summary of follow-up activities and monitoring results from a number of key monitoring programs required by the DS, including the:

- Air Quality and Fugitive Dust Management Plan;
- Federal Decision Statement Condition 3.15 - Memo
- Caribou Mitigation and Monitoring Plan.
- Country Foods and Socio-economic Follow-up Program;
- Country Foods Monitoring Plan.
- Follow-up Program for Condition 3.14 of the Blackwater Gold Project.
- Follow-up Program for Condition 3.16 of the Blackwater Gold Project.
- Mine Site Water and Discharge Monitoring and Management Plan.
- Wetland Management and Offsetting Plan;
- Whitebark Pine Management Plan; and,
- Wildlife Mitigation and Monitoring Plan.

Operations at the Mine began in 2025 and included development of the open pit and operations of the mill. Construction activities continued through 2025 as well with a focus on those activities outlined below:

- Continued development of TSF Dam C
- Development of the LGO stockpile foundation panels
- Construction of water management infrastructure
- Establishing ancillary buildings and associated facilities

Tree clearing and soil salvage occurred where needed to support those activities.

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## Acronyms and Abbreviations

|   |   |
|---|---|
| Aboriginal Groups or Indigenous Nations | Aboriginal Groups include: Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Stellat'en First Nation, Saik'uz First Nation, and Nazko First Nation (as defined by the EAC)   |
| AEMP                                    | Aquatic Effects Monitoring Program  |
| AQDMP                                   | Air Quality and Fugitive Dust Management Plan   |
| Artemis                                 | Artemis Gold Inc.   |
| ARU                                     | Autonomous Recording Unit   |
| BC                                      | British Columbia  |
| Blackwater, Project, or Mine            | Blackwater Mine or Blackwater Gold Project  |
| BW Gold                                 | BW Gold LTD.  |
| CEMP                                    | Construction Environmental Management Plan  |
| CFMP                                    | Country Foods Monitoring Plan   |
| CMMP                                    | Caribou Mitigation and Monitoring Plan  |
| CPB                                     | Call Playback   |
| DFO                                     | Fisheries and Oceans Canada   |
| DS                                      | Decision Statement  |
| EAC                                     | Environmental Assessment Certificate  |
| EAO                                     | BC Environmental Assessment Office  |
| ECCC                                    | Environment and Climate Change Canada   |
| EMLI                                    | Ministry of Energy, Mines and Low Carbon Innovation   |
| ENV                                     | Ministry of Environment and Climate Change Strategy   |
| ESC                                     | Erosion and Sediment Control  |
| FLNRORD                                 | Ministry of Forests, Lands, Natural Resource Operations, and Rural Development  |
| FMSCP                                   | Fuel Management and Spill Control Plan  |
| FSR                                     | Forest Service Road   |
| FUP                                     | Annual Follow-up Program Report   |
| FWR                                     | Freshwater Reservoir  |
| IECD                                    | Interim Environmental Control Dam   |
| Indigenous groups or Aboriginal Peoples | Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stellat'en First Nation, Nazko First Nation, Skin Tyee Nation, T'silhqot'in Nation, Métis Nation British Columbia, and Nee-Tahi-Buhn Band (as defined in the Federal Decision Statement) |
| JAIR or Joint MA/EMA Application        | Joint Application Information Requirements for Mines Act and Environmental Management Act Permits   |
| km                                      | Kilometer   |
| kV                                      | Kilovolt  |
| LDN                                     | Lhoosk'uz Dené Nation   |
| LPU                                     | Local Population Unit   |
| LSA                                     | Local Study Area  |
| m                                       | Meter   |
| M-246                                   | Mines Act Permit M-246  |
| MAR                                     | Mine Access Road  |
| MASL                                    | Meters above sea level  |
| MNBC                                    | Métis Nation British Columbia   |
| MSDP                                    | Mine Site Water and Discharge Monitoring and Management Plan  |
| MSTCP                                   | Mine Site Traffic Control Plan  |
| Mtpa                                    | Million tonnes per annum  |
| New Gold                                | New Gold Inc.   |
| NFN                                     | Nazko First Nation  |
| NFNs                                    | Nechako First Nations   |
| NTBIB                                   | Nee-Tahi-Buhn Band  |
| NTU                                     | Nephelometric turbidity unit  |
| NVMP                                    | Noise and Vibration Effects Monitoring and Mitigation Plan  |
| PASS                                    | Passive Air Sampling System   |

|           |  |
|-----------|--|
| PE-110650 | Environmental Management Act Permit 110650           |
| PE-110652 | Environmental Management Act Permit 110652           |
| PCR       | Project Completion Report                            |
| PPE       | Personal Protective Equipment                        |
| QA/QC     | Quality assurance/quality control                    |
| QP        | Qualified Professional                               |
| RCP       | Reclamation and Closure Plan                         |
| RMA       | Riparian Management Area                             |
| RoW       | Right-of-Way   |
| SCP       | Sediment Control Pond                                |
| SEPSCP    | Surface Erosion Prevention and Sediment Control Plan |
| SMP       | Soil Management Plan                                 |
| SOP       | Standard Operating Procedure                         |
| STN       | Skin Tyee Nation                                     |
| t/d       | Tonnes/day   |
| TNG       | Tsilhqot'in Nation                                   |
| TSF       | Tailings Storage Facility                            |
| TSS       | Total suspended solids                               |
| UFN       | Ulkatcho First Nation                                |
| VMP       | Vegetation Monitoring Plan                           |
| WMMP      | Wildlife Mitigation and Monitoring Plan              |
| WMOP      | Wetland Management and Offsetting Plan               |
| WMP       | Waste (Refuse and Emissions) Management Plan         |
| WPMP      | Whitebark Pine Management Plan                       |

# 1 Introduction

The Blackwater Gold Mine (the Mine) is a gold and silver open pit mine currently under construction in central British Columbia (BC), approximately 112 kilometers (km) southwest of Vanderhoof, 160 km southwest of Prince George, and 446 km northeast of Vancouver (Figure 1-1).

The Mine is presently accessed via the Kluskus Forest Service Road (FSR), the Kluskus-Ootsa FSR and an exploration access road, which connects to the Kluskus-Ootsa FSR at km 142. The Kluskus FSR joins Highway 16 approximately 10 km west of Vanderhoof. A new, approximately 13.8 km road (Mine Access Road; MAR) will be built to replace the existing exploration access road, which will be decommissioned. The planned new access is at km 124.5 km. Driving time from Vanderhoof to the Mine Site takes roughly 2.5 to 3 hours.

Major mine components include a tailings storage facility (TSF), ore processing facilities, waste rock, overburden and soil stockpiles, borrow areas and quarries, water management infrastructure, water treatment plants, accommodation camps and ancillary facilities (Figure 1-2). The gold and silver will be recovered into a gold-silver doré product and shipped by air and/or transported by road. Electrical power will be supplied by a new approximately 135 km, 230 kilovolt (kV) overland transmission line that will connect to the BC Hydro grid at the Glenannan substation located near the Endako mine, 65 km west of Vanderhoof.

The Blackwater mine site is located within the traditional territories of Lhoosk'uz Dené Nation (LDN), Ulkatcho First Nation (UFN), Skin Tyee Nation (STN) and Tsilhqot'in Nation (TNG). The Kluskus and Kluskus-Ootsa FSRs and Mine transmission line cross the traditional territories of Nadleh Whut'en First Nation, Saik'uz First Nation, and Stelat'en First Nation (collectively, the Nechako First Nations, NFNs) as well as the traditional territories of the Nazko First Nation (NFN), Nee-Tahi-Buhn Band (NTBIB), Cheslatta Carrier Nation and Yekooche First Nation (BC EAO, 2019a) (BC EAO, 2019b).

Mining operations under the permitted life-of-mine (LoM) plan involve extraction of 334 Mt of ore, 584 Mt of waste rock, and 83 Mt of overburden. Early mining focuses on high-grade, near-surface ore, while lower-grade material will be stockpiled for processing near the end of mine life.

The mine will be developed in phases, with ore processing capacity expanded in Phases throughout the mine life periodically. Since operations began in 2025 (Year 1), the phasing has been refined. The mine is steadily progressing towards its Phase 1A throughput capacity of 8 Mtpa which it intends on reaching by end of 2026, followed by implementation of an Expanded Phase 2 (EP2) reaching 21 Mtpa by the end of 2028. These refinements do not materially alter the physical aspects of the mine beyond the processing mill; instead, they compress the overall mine life from 23 years to approximately 18 years.

New Gold Inc. (New Gold) received Environmental Assessment Certificate #M19-01 (EAC) on June 21, 2019 under the 2002 *Environmental Assessment Act* (BC EAO, 2019c) and a Decision Statement (DS) on April 15, 2019 under the *Canadian Environmental Assessment Act, 2012* (CEA Agency, 2025). In August 2020, Artemis Gold Inc. (Artemis) acquired the mineral tenures, assets and rights in the Blackwater Mine that were previously held by New Gold Inc. On August 7, 2020, the Certificate was transferred to BW Gold LTD. (BW Gold), a wholly owned subsidiary of Artemis, under the 2018 *Environmental Assessment Act*. The Impact Assessment Agency of Canada notified BW Gold on September 25, 2020, to verify that written notice had been provided within 30 days of the change of proponent as required in Condition 2.16 of the DS. An updated Federal DS reflecting this change was issued on March 25, 2025.

This is the Blackwater Gold Mine annual follow-up program (FUP) report for the January 1, 2025 – December 31, 2025, reporting period (reporting period), provided pursuant to the federal Environmental Assessment (EA) process.

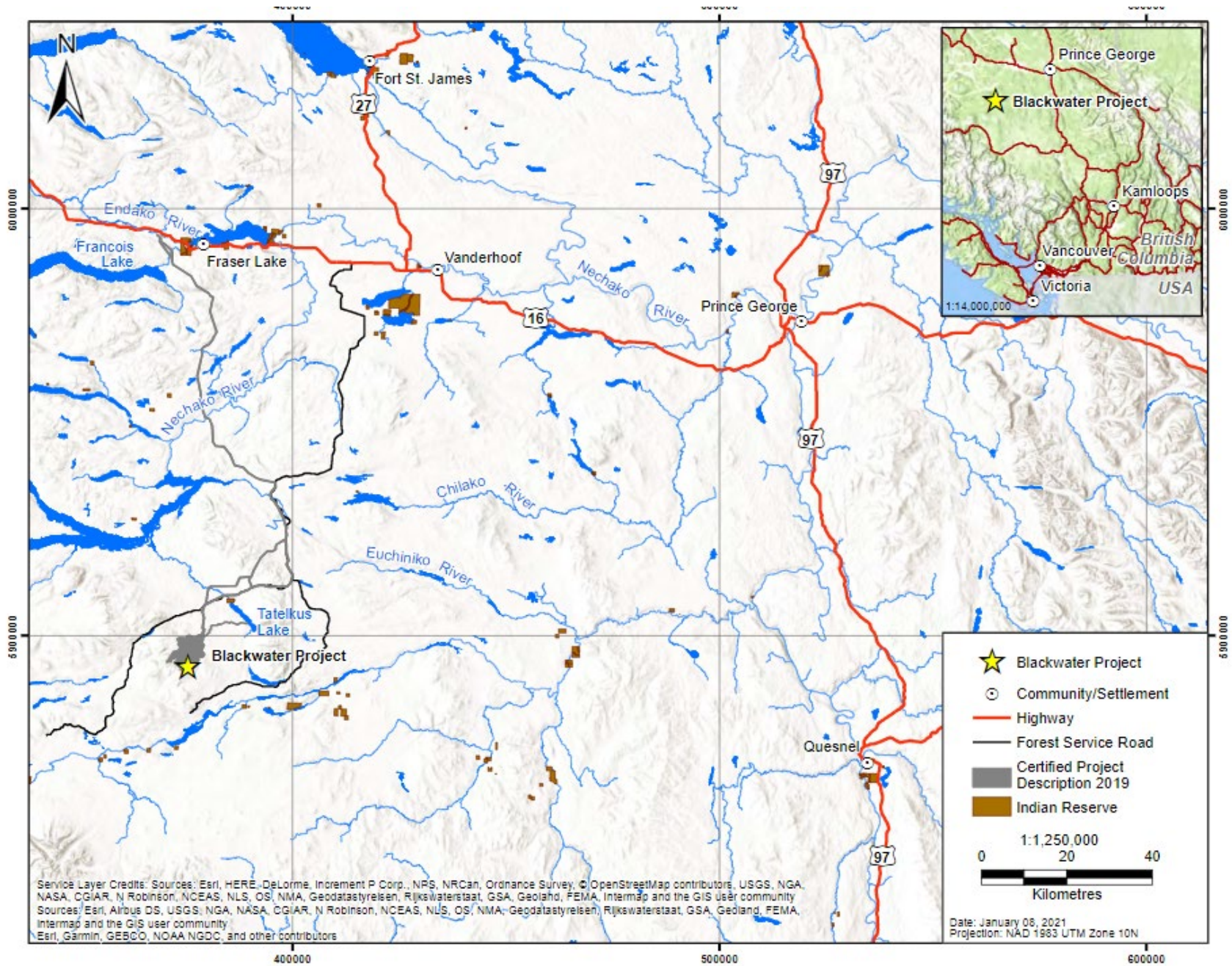


Figure 1-1: Project Location

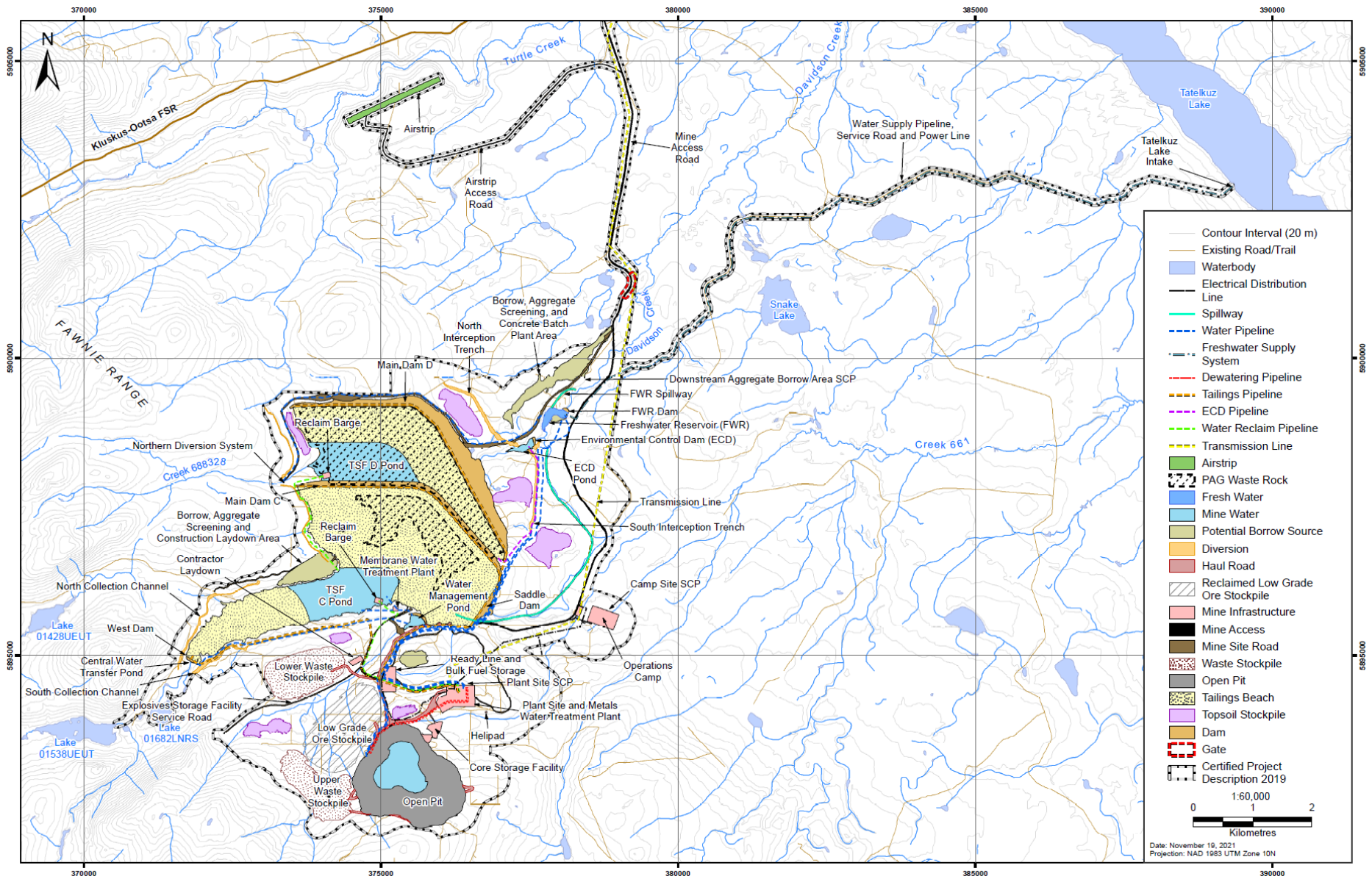


Figure 1-2: Overview of planned Mine works

## 1.1 Mine Activities

Operations at the Mine began in 2025 and included continued development of the open pit using conventional drill, blast, load and haul techniques, and operations of the mill. Several significant milestones were achieved in Q1 2025 including the commencement of mill operations (January 22), initial deposition of tailings (January 25), and placement of Low Grade Ore (LGO) on the LGO Stockpile (March 14).

By May 2025 commercial production was achieved, and operations continued through the year.

Construction activities continued through 2025 as well with a focus on those activities outlined below:

- Continued development of TSF Dam C
- Development of the LGO stockpile foundation panels
- Construction of water management infrastructure
- Establishing ancillary buildings and associated facilities

Tree clearing and soil salvage occurred where needed to support those activities.

No works occurred on the Mine Access Road, Upper or Lower Waste Rock Stockpiles, Fresh Water Supply System (FWSS) (excluding the Freshwater Reservoir), or Northern Diversion System.

To support water management at the Mine operation and construction of water management infrastructure occurred in 2025. No effluent was discharged in 2025, as this water was pumped to the mill as make-up water to support production, instead discharges from the mine in 2025 were diverted sources.

Air emission discharges from the plant occurred in 2025, along with the production of fugitive dust.

A summary of specific activities undertaken to satisfy conditions of the DS conditions is presented in Appendix 1.

### 1.1.1 2025 Wildfire Season

Several wildfires occurred in the vicinity of the Mine in 2025, however construction, operations and monitoring activities at the Mine were less impacted than in 2024 and 2023. No evacuations occurred, no fires intercepted the mine site, Forest Service Road (FSR), transmission line, or planned offsetting sites, and the timing and completion of monitoring was not impacted. Smoke produced from those fires did impact air quality at the mine during the summer months.

## 1.2 Report Scope and Navigation

On April 15, 2019, the Mine was issued the DS (CEA Agency, 2025). Condition 2.11 of this document requires the development of an annual report, Table 1-1 summarizes the requirements of this conditions and where each component has been addressed, while Table 1-2 summarizes where information related to those follow-up programs is presented.

Table 1-1: Summary of condition 2.11

| Condition  | Section   |
|--|---|
| <b>2.11.1</b> the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;   | Appendix 1  |
| <b>2.11.2</b> how the Proponent complied with condition 2.1;   | Section 1.4 Implementation (2.1)                      |
| <b>2.11.3</b> for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation, including a rationale for how the views have, or have not, been integrated; | Appendix 2<br>Section 1.3.2 Follow-Up Program Updates |
| <b>2.11.4</b> The information referred to in conditions 2.5 and 2.6 for each follow-up program;  | Appendix 2<br>Section 1.3.2 Follow-Up Program Updates |
| <b>2.11.5</b> The results of the follow-up program requirements identified in conditions 3.14, 3.15, 3.16, 4.5, 5.5, 6.11, 6.12, 6.13, 6.14, 8.18.6, 8.20.5, 8.21, and 8.22 if required;   | Table 1-2   |
| <b>2.11.6</b> Any update made to any follow-up program in the reporting year;  | Section 1.3.2 Federal Follow-Up Program Updates (2.6) |
| <b>2.11.7</b> Any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.9 and rationale for why mitigation measures were selected pursuant to condition 2.5.4; and  | Table 1-2   |
| <b>2.11.8</b> Any change(s) to the Designated Project in the reporting year.   | Section 1.3.1 Designated Project (2.17)               |

Table 1-2: DS condition navigation summary

| Condition No. | Condition   | Section (DS 2.11.5, 2.11.7)         | Appendix   |
|---------------|---|-------------------------------------|--|
| 3.14          | <p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects of the Designated Project on fish and fish habitat. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.</p> <p>Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall...</p>   | 2 Fish and Fish Habitat (3.14)      | Appendix 3: <i>Follow-Up Programs for Condition 3.14 Annual Report 2025.</i>         |
| 3.15          | <p>The Proponent shall develop, in consultation with Indigenous groups and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects of the Designated Project on fish habitat in Davidson Creek, Creek 661 and Chedakuz Creek. The Proponent shall develop the follow-up program prior to construction and shall implement the follow-up program during all phases of the Designated Project. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall...</p>  | 3 Water Quality and Quantity (3.15) | Appendix 4: <i>Blackwater DS 3.15 2025 Annual Report</i>                             |
| 3.16          | <p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to fish habitat in Tatelkuz Lake and Chedakuz Creek. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall:</p>  | 4 Fish Habitat (3.16)               | Appendix 5: <i>Follow-Up Programs for Condition 3.16 Annual Report 2025.</i>         |
| 4.5           | <p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of all mitigation measures to avoid harm to migratory birds, including migratory birds that are listed species at risk, their eggs and nests. The follow-up program shall include the mitigation measures used to comply with condition 4.1 to 4.4. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.</p>  | 5 Migratory Birds (4.5)             | Appendix 6: <i>2025 Wildlife Mitigation and Monitoring Program Compliance Report</i> |
| 5.5           | <p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the predictions of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on wetland functions and to determine the effectiveness of the mitigation measures as it pertain to wetlands. The Proponent shall implement the follow-up program during from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall...</p>  | 6 Wetlands (5.5)                    | Appendix 7: <i>2025 Wetland Management and Offsetting Plan Annual Report</i>         |
| 6.11          | <p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the health of Indigenous Peoples caused by changes in concentrations of contaminants of potential concern in water, soil, vegetation and wildlife, including fish, and determine the effectiveness of mitigation measures. As part of the development of the follow-up program, the Proponent shall identify the vegetation and wildlife species that shall be monitored, the locations where the monitoring will be conducted, the contaminants to be monitored and the frequency of the monitoring. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. In doing so, the Proponent shall...</p> | 7 Country Foods (6.11) (6.13)       | Appendix 8-1: <i>2025 Country Foods Monitoring Plan Annual Report</i>                |
| 6.12          | <p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the health of Indigenous Peoples as a result of changes to air quality and determine the effectiveness of mitigation measures. As part of the implementation of the follow-up program, the Proponent shall monitor nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), fine particulate matter (PM<sub>2.5</sub>), particulate matter (PM<sub>10</sub>), dust, and carbon monoxide (CO) in air. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.</p>   | 8 Air Quality (6.12)                | Appendix 9: <i>Air Quality and Fugitive Dust Management Annual Report 2025</i>       |

| Condition No. | Condition   | Section (DS 2.11.5, 2.11.7)       | Appendix  |
|---------------|---|-----------------------------------|---|
| 6.13          | The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the socio-economic conditions of Indigenous Peoples as a result of changes to access, availability and quality of country foods. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.   | 7 Country Foods (6.11) (6.13)     | Appendix 8-2: 2025 Annual Monitoring Report Country Foods Socio-economic Conditions Follow-up Program (DS 6.13) |
| 6.14          | The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse effects from the Designated Project on moose ( <i>Alces alces</i> ) and determine the effectiveness of mitigation measures. As part of the implementation of the follow-up program, the Proponent shall conduct winter distribution and density surveys for moose ( <i>Alces alces</i> ) starting prior to construction and until the end of operation. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. | 9 Effects on Moose (6.14)         | Appendix 6: 2025 Wildlife Mitigation and Monitoring Program Compliance Report                                   |
| 8.18.6        | A description of the follow-up program the Proponent shall implement to determine the effectiveness of the mitigation measures included in the compensation plan. As part of the development of the follow-up program, the Proponent shall determine, in consultation with Indigenous groups, the methods, timing and frequency for conducting winter surveys for caribou abundance and distribution within the Designated Project area. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program.   | 10 Effects on Caribou (8.18.6)    | Appendix 6: 2025 Wildlife Mitigation and Monitoring Program Compliance Report                                   |
| 8.20.5        | Develop and implement a follow-up program in consultation with Indigenous groups to determine the effectiveness of the mitigation measures included in the whitebark pine management plan. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program. The follow-up program shall include...  | 11 Whitebark Pine (8.20.5)        | Appendix 10: BW Gold Whitebark Pine 2025 Update   |
| 8.21          | The Proponent shall develop, in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to the effects of changes caused by the Designated Project on western toad ( <i>Anaxyrus boreas</i> ). The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall...  | 12 Effects on Western Toad (8.21) | Appendix 6: 2025 Wildlife Mitigation and Monitoring Program Compliance Report                                   |
| 8.22          | The Proponent shall develop, in consultation with Indigenous groups, and implement a follow-up program to monitor little brown myotis ( <i>Myotis lucifugus</i> ) and northern myotis ( <i>Myotis septentrionalis</i> ) usage of buffer zones established pursuant to condition 8.14 and roosting structures installed and maintained by the proponent pursuant to condition 8.15 to determine the effectiveness of the mitigation measures. The Proponent shall implement the follow-up program during construction and operation and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.   | 13 Effects on Bats (8.22)         | Appendix 6: 2025 Wildlife Mitigation and Monitoring Program Compliance Report                                   |

## 1.3 Federal Decision Statement Administration

Details regarding the administration of the federal DS during the reporting period are provided below.

### 1.3.1 Designated Project (2.17)

No changes to the Designated Project have been made.

### 1.3.2 Follow-Up Program Updates (2.6)

Table 1-3 summarizes those follow-up programs that were updated during the reporting period. Each submission included a change log outlining where updates had been made. Appendix 2 provides details regarding the consultation of these plans, including the change logs provided with each submission.

As reflected in the follow-up programs themselves, these are living documents to be updated as needed during the life of mine based on the results of monitoring programs and in consideration of feedback from Indigenous groups and regulators.

*Table 1-3 Follow-Up Programs Updated during the reporting period*

| Follow-Up Program   | Description  |
|---|--|
| Air Quality and Fugitive Dust Management Plan (AQFDMP)                  | The AQFDMP was updated in 2025; on April 30, 2025, the revised plan was submitted for review as required under PE-110650 and in accordance with Condition 2.3.2 of the Federal Decision Statement. |
| Accidents and Malfunctions Administration and Communication Plan (AMCP) | The AMCP was updated in 2025; on November 15, 2025, the revised plan was submitted for review to support clarity and alignment with the Mine Emergency Response Plan (MERP).                       |

Additional management plans in place to support compliance with conditions of the FDS that were updated during the reporting period are summarized below in Table 1-4.

*Table 1-4: Management plans supporting implementation of FDS conditions updated during the reporting period*

| Follow-Up Program               | Description   |
|---------------------------------|---|
| Aquatic Effects Monitoring Plan | <p>An updated AEMP was provided on March 28, 2025</p> <ul style="list-style-type: none"> <li>Following the December 6, 2024 submission, AEMP Version 3.1 (V3.1) was prepared based on comments from Ministry of Environment and Climate Change Strategy (ENV), BC Ministry of Water, Land and Resource Stewardship (WLRS), and Nechako First Nations (NFNs).</li> </ul> <p>An updated AEMP was provided on April 30, 2025.</p> <ul style="list-style-type: none"> <li>AEMP Version 4 (AEMP V4) was submitted April 30, 2025 and included updates made based on the 2024 AEMP Interpretive Report as well as comments from reviewers. Since the submission of the V3.1, engagement with the ENV and WLRS continued, resulting in the development of the V4.</li> <li>V4 was approved by ENV on May 29, 2025</li> </ul> |

## 1.4 Implementation (2.1)

As required by DS condition 2.1 BW Gold has continued to design, permit, and construct the Mine in a manner that considers and incorporates corporate standards and policies, the expertise of the selected consulting firms, continued involvement of a team of QPs, and ongoing engagement with Indigenous groups.

**2.1.** *The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action (including community and Indigenous traditional knowledge), are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.*

QPs have developed and supported in the implementation of those programs that make up the basis of this document. Signatures have been provided on those finalized documents and reflect the requirements of this condition.

## 1.5 Consultation (2.12)

This version of the document is a draft provided for the review of Indigenous Nations per condition 2.12.

**2.12** *The Proponent shall provide a draft annual report referred to in condition 2.11 to Indigenous groups, no later than June 30 following the 2024 reporting year and no later than 3 months following the reporting year to which the annual report applies thereafter. The Proponent shall consult Indigenous groups on the content and findings in the draft annual report.*

Comments, responses, and any discussion held to address those comments will be included in this section when the report has been finalized.

## 2 Fish and Fish Habitat (3.14)

The fish and fish habitat *Follow-up Program for Condition 3.14 of the Blackwater Gold Project* (Palmer, 2023a) was developed to address the conditions outlined in condition 3.14 of the DS. It was designed to first characterize baseline conditions for each of the indicators listed in the condition, and then monitor those indicators during all phases of the Mine to determine, to the extent possible, if:

- Variation from baseline conditions is occurring;
- Mitigation measures are effective;
- If the environmental assessment was accurate in terms of anticipated effects on the indicators; and,
- Determine if additional mitigations should be taken pursuant to Condition 2.9.

The programs and their results are presented in Appendix 3: *Follow-Up Programs for Condition 3.14 Annual Report 2025*.

This section provides an overview of monitoring, results, and adaptive management that occurred during the reporting period to support compliance with DS 3.14. Full details can be reviewed in the documents listed above. Table 2-1 summarizes this condition of the DS and where those details can be found in the associated appendix of this document.

Table 2-1: DS condition 3.14 follow-up monitoring

| Condition No. | Condition   | Appendix   | Section  |
|---------------|---|--|--|
| 3.14.         | The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects of the Designated Project on fish and fish habitat. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall: | Described in the <i>Follow-up Programs for Condition 3.14 of the Blackwater Gold Project Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012</i> |  |
| 3.14.1.       | Conduct parasite and pathogen inventories in Lake 01538UEUT and Lake 01682LNRS prior to enlarging Lake 01682LNRS and connecting it to Lake 01538UEUT pursuant to condition 3.13 and compare the results of the parasite and pathogen inventories for the two lakes;   | Described in the <i>Follow-up Programs for Condition 3.14 of the Blackwater Gold Project Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012</i> | Complete in 2021 (Palmer, 2023a).  |
| 3.14.2.       | Monitor, starting when the Proponent starts to pump water into Davidson Creek and continuing through until the freshwater supply system has been decommissioned, rainbow trout ( <i>Oncorhynchus mykiss</i> ) and Kokanee ( <i>Oncorhynchus nerka</i> ) populations in Davidson Creek, including  | Appendix 3: <i>Follow-Up Programs for Condition 3.14 Annual Report 2025</i>  |  |
| 3.14.2.1.     | Community composition of rainbow trout ( <i>Oncorhynchus mykiss</i> ) and Kokanee ( <i>Oncorhynchus nerka</i> ), their absolute abundance, genetic structure and diversity;   |  | 2.0 Young-of-Year and Juvenile Rainbow Trout Summer Abundance (Appendix 3)<br><br>4.0 Rainbow Trout Spring Spawner and Redd Abundance (Appendix 3)<br><br>5.0 Kokanee Summer Spawner and Redd Abundance (Appendix 3) |
| 3.14.2.2.     | Absolute abundance of overwintering rainbow trout juveniles; and  |  | 3.0 Juvenile Rainbow Trout Overwintering Abundance (Appendix 3)  |
| 3.14.2.3.     | Characteristics of spawner populations through surrogate monitoring metrics including size at 50% maturity, redd counts and spawner distribution.   |  | 4.0 Rainbow Trout Spring Spawner and Redd Abundance (Appendix 3)<br><br>5.0 Kokanee Summer Spawner and Redd Abundance (Appendix 3)<br><br>6.0 Kokanee Fry Spring Outmigration (Appendix 3)                           |

## 2.1 Monitoring and Analysis

As outlined in Table 2-1 above, detailed regarding the reporting period monitoring activities done in support of condition 3.14 are provided in Appendix 3. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 2-2 summarizes the monitoring results and recommendations for work done in Davidson Creek, it also specifies where further information on each item can be found in the Appendix.

Monitoring for parasites and pathogens in Lake 15 and 16, as required by DS condition 3.14.1. occurred in September 2021 and is summarized in the *Follow-up Program for Condition 3.14 of the Blackwater Gold Project*. The study concluded that parasites and pathogens causing disease in fish are not present in Lake 15 or 16, and that no additional monitoring is required (Palmer, 2023a).

Table 2-2: Summary of DS condition 3.14 follow-up monitoring (Triton, 2026a)

| Monitoring  | Survey /Methodology                        | Dates  | Results Summary   | Adaptive Management/Recommendations   |
|---|--|--|---|---|
| <b>Juvenile Rainbow Trout Overwintering Abundance Survey</b>          | <b>Appendix 3, Section 3.1.2 and 3.2.2</b> | Mid-winter: March 2025<br>Spring post-overwintering: April 2025<br>Fall pre-overwintering: October 2025  | <b>Appendix 3, Section 3.0</b><br>During mid-winter surveys, juvenile Rainbow Trout were recorded at all ten survey sites. MaxN (individual fish in a single video frame) ranged from 1 to 11. Dissolved oxygen levels were generally high and flowing water was observed at all sites.<br><br>Post-overwintering survey was largely unsuccessful due to freshet conditions experienced during sampling; three of six sites were sampled. Abundance results, ranging from $34 \pm 3.50$ to $65 \pm 17.79$ fish per site, were compared to those from the 2024 pre-overwintering survey to determine overwintering mortality (OWM); OWM ranged from 62.9 % to 73.4%. Pre-overwintering abundance results for Yong-of-Year (YOY) and juvenile Rainbow Trout, ranged from $36 \pm 2.69$ to $131 \pm 16.75$ and from $33 \pm 1.83$ to $143 \pm 13.9$ , respectively. Abundance estimates of juveniles at DC-9 during pre-overwintering surveys were substantially greater in 2025 than at other sites and in previous years.                | <b>Appendix 3, Section 3.2.5</b><br>Recommendations resulting from the 2025 juvenile Rainbow Trout overwintering abundance program include: <ul style="list-style-type: none"> <li>Alternative approaches to estimate overwintering mortality be explored, specifically approaches that do not depend on spring post-overwintering electrofishing surveys as these are difficult to schedule to avoid freshet conditions and have been unsuccessful in two of the three past years</li> </ul>   |
| <b>Young -of-the-year and juvenile Rainbow Trout Summer Abundance</b> | <b>Appendix 3, Section 2.2</b>             | July 11 – August 11, 2025  | <b>Appendix 3, Section 2.4</b><br>Rainbow Trout overall abundance estimates ranged from 104 to 579 fish per site. Abundance estimates of juveniles were higher in 2025 at all sites than in previous years, while abundance estimates of YOY were notably higher in 2025 at two sites but similar at the other eight sites. Length-frequency distributions indicated multiple distinct year classes with a greater number of YOY Rainbow Trout (less than 60mm) in 2025 than in 2024. Statistically significant differences in length-frequency distributions were detected among all sampling years. Length-age regressions suggested that growth trajectories of Rainbow Trout did not differ among sampling years. Condition indices, for both YOY and juvenile Rainbow Trout, were significantly greater in Davidson Creek than for fish in watercourses sampled under the Aquatic Effects Monitoring Program. Significant differences in mesohabitat abundance were observed among most years (2023, 2024, and 2025) at all sites. | <b>Appendix 3, Section 2.5</b><br>Recommendations resulting from the 2025 YOY and juvenile Rainbow Trout summer abundance program include: <ul style="list-style-type: none"> <li>Alternative approaches to fish habitat monitoring be explored. The current FHAP methodology is strongly influenced by observer interpretation and short-term environmental variability (e.g., flow, turbidity) resulting in low repeatability and inconsistent data across years. These limitations reduce the method's ability to detect subtle or cumulative habitat changes associated with Mine effects, making it poorly suited for robust effects assessments.</li> </ul>   |
| <b>Kokanee Fry Spring Outmigration Survey</b>                         | <b>Appendix 3, Section 6.2</b>             | April 18 - June 13, 2025   | <b>Appendix 3, Section 6.4</b><br>Two estimates of Kokanee fry abundance were derived, one used an area-based approach that related the wetted net opening area to the cross-sectional wetted channel area, adjusted for the time interval sampled. The second estimate was derived using trap-efficiency determined by a mark-recapture program. Both resulting estimates of abundance (area-based = 137,107; mark-recapture = 216,209) were notably higher than both the 2023 and 2024 estimates. The higher abundance estimates may be attributable to the increased sampling frequency conducted in 2025. Although the sampling program was initiated earlier than in previous years, it was determined that Kokanee fry outmigration began earlier than April 18, 2024; outmigration also began earlier than was predicted based on accumulated thermal units.   | <b>Appendix 3, Section 6.5</b><br>Recommendations resulting from the 2025 Kokanee fry program include: <ul style="list-style-type: none"> <li>The AEMP Implementation Framework commencement trigger be adjusted by reducing the ATU threshold. Monitoring in 2025 indicates that Kokanee fry outmigration in Davidson Creek occurs at a lower ATU value than the current trigger reflects. Lowering this threshold will support more accurate, watercourse-specific timing for sampling events.</li> </ul>   |
| <b>Rainbow Trout Spring Spawner and Redd Abundance Survey</b>         | <b>Appendix 3, Section 4.2</b>             | Box Traps in Lower Davidson Creek: April 23 to June 16, 2025<br>Box Traps in Upper Davidson Creek: May 4 to June 20, 2025<br>Bank Walks: May 6 and June 14, 2025 | <b>Appendix 3, Section 4.4</b><br>Box traps installed in the lower reach of Davidson Creek resulted in the capture of 917 fish, including 455 adult Rainbow Trout. Box traps installed in the reach near the mine footprint resulted in the capture of 41 adult Rainbow Trout. A total of 57 bank walk surveys were conducted between May 6 and June 14, 2025.<br><br>Total Rainbow Trout spawner abundance was determined to be 465 unique individuals, similar to 2024. A limited number of Rainbow Trout spawners and redds were observed during bank walks due to variable flow conditions and reduced stream visibility.   | <b>Appendix 3, Section 4.5</b><br>Recommendations resulting from the 2025 Rainbow Trout spawner program include: <ul style="list-style-type: none"> <li>Investigate the potential use of PIT tag arrays to determine distribution of spawning Rainbow Trout in Davidson Creek to replace the Rainbow Trout visual spawner surveys and the box trap sampling at the DC-8 location. Visual spawner surveys provide limited data when water clarity and high flow conditions, that are experienced throughout freshet, limits observer efficiency. Adult fish returning to Davidson Creek to spawn are initially captured at DC-1; replacing the box trap at DC-8 with a PIT Tag array would reduce the number of times fish are subsequently captured and handled.</li> </ul> |

| Monitoring  | Survey /Methodology            | Dates                        | Results Summary  | Adaptive Management/Recommendations  |
|---|--------------------------------|------------------------------|--|--|
| <b>Kokanee Summer Spawner and Redd Abundance</b>                  | <b>Appendix 3, Section 5.0</b> | July 19 - September 24, 2025 | <p><b>Appendix 3, Section 5.4</b><br/> Timing of Kokanee spawning in Davidson Creek in 2025 was similar to previous years. Kokanee spawning is limited to the two lowest reaches of Davidson Creek as a large beaver dam limits spawner migration further upstream; no Kokanee or redds were observed in survey sections upstream of the beaver dam. Spawner densities observed during weekly bank walk surveys ranged from 0 to 24.67 Kokanee/100 m<sup>2</sup>, with the peak spawner density occurring in mid August. Redd densities ranged from 0 to 1.16/100 m<sup>2</sup>, with peak redd density occurring in mid September.</p> <p>Kokanee escapement estimates were determined via Gaussian area-under-the-curve and Trapezoidal area-under-the-curve methodologies, based on live counts adjusted for observer efficiency. The 2025 Davidson Creek Kokanee GAUC escapement was estimated at 7,372 (3,030 to 11,715), while the TAUC estimate was 6,193 (1,958 to 10,429).</p> <p>An underwater camera, deployed at the mouth of Davidson Creek, was unsuccessful in recording footage during low-light and nighttime conditions and documented only 419 Kokanee.</p> | <p><b>Appendix 3, Section 5.5</b><br/> Recommendations resulting from the 2025 Kokanee spawner program include:</p> <ul style="list-style-type: none"> <li>The use of the underwater camera to determine escapement be discontinued. This sampling technique has been consistently unsuccessful across all years of deployment and has not produced data of sufficient quality or reliability to inform escapement estimates. In addition to the lack of meaningful results, installation of the camera box and fish fence at the mouth of Davidson Creek for the duration of the spawning season introduces an avoidable risk of impeding adult spawner migration into the system. The structure also requires considerable staff time for installation, maintenance, troubleshooting, and video review, with no demonstrated return in usable data. Given these biological and operational concerns, continued use of this method is not justified, and resources would be better allocated to alternative monitoring approaches with proven effectiveness.</li> </ul> |
| <b>Dissolved Free Amino Acids</b>                                 |                                |                              | <p>Dissolved free amino acid (DFAA) are used by salmonids for olfactory imprinting and homing to natal streams and the laboratory results will be used in future years to determine if amino acid concentrations in Davidson Creek are altered by the operation of the Fresh Water Supply System. DFAA sampling was not conducted in 2025 as multiple years of baseline data has been collected and the FWSS has not yet been constructed.</p>   |  |
| <b>Rainbow Trout and Kokanee Genetics Structure and Diversity</b> |                                |                              | <p>No sampling was conducted to collect tissue samples from Rainbow Trout and Kokanee in Davidson Creek to monitor genetic structure and diversity in 2025 given the once-per-four-year sampling frequency. Genetic sampling was last conducted in 2024.</p>   |  |

### 3 Water Quality and Quantity (3.15)

Compliance with condition 3.15 of the DS is met through implementation of the *Aquatic Effects Monitoring Plan* (AEMP) (ERM, 2025) and the memo regarding *Federal Decision Statement Condition 3.15* (Artemis Gold Inc., 2022). The AEMP addresses conditions 3.15.1 and 3.15.2, related to surface water quality/quantity monitoring in the receiving environment, this program was specifically designed to meet the following objectives:

- Detect Mine related effects on the aquatic ecosystem components (including water quality);
- Confirm water quality predictions and effects assessments;
- Meet permit and regulatory requirements for effluent and receiving environment quality;
- Assess the performance of mitigation and management measures; and,
- Provide the necessary feedback and information for the adaptive management of potential Mine-related effects.

While condition 3.15.3 is addressed through groundwater monitoring included in the *Mine Site Water and Discharge Monitoring and Management Plan* (MSDP) (Blackwater Gold Ltd, 2026b).

A summary of the activities undertaken through these programs as they relate to condition 3.15 have been compiled in the *2025 Follow-up Programs for Condition 3.15 of the Blackwater Gold Project Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012* (Appendix 4).

This section provides an overview of monitoring, results, and adaptive management that occurred during the reporting period to support compliance with DS 3.15. Full details can be reviewed in Appendix 4. Table 3-1 below summarizes this condition of the DS and where those details can be found in the associated appendix of this document.

Table 3-1: DS condition 3.15 follow-up monitoring

| Condition No.  | Condition  | Appendix   | Section   |
|----------------|--|--|---|
| <b>3.15.</b>   | The Proponent shall develop, in consultation with Indigenous groups and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects of the Designated Project on fish habitat in Davidson Creek, Creek 661 and Chedakuz Creek. The Proponent shall develop the follow-up program prior to construction and shall implement the follow-up program during all phases of the Designated Project. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall:                    | Described in the memo regarding <i>Federal Decision Statement Condition 3.15</i> (Artemis Gold Inc., 2022) |   |
| <b>3.15.1.</b> | Monitor water flows in Davidson Creek during the open water season from construction until decommissioning, and temperature continuously from construction until decommissioning;  |  | 2.0 Monitoring Flows and Temperature in Davidson Creek  |
| <b>3.15.2.</b> | Monitor water quality in Davidson Creek, Creek 661 and Chedakuz Creek for contaminants of potential concern, including those identified in Table 5 of the environmental assessment report, during all phases of the Designated Project; and  | Appendix 4: <i>Blackwater DS 3.15 2025 Annual Report</i>   | 3.0 Monitoring Water Quality in Davidson Creek, Creek 661, and Chedakuz Creek for Contaminants of Potential Concern |
| <b>3.15.3.</b> | Monitor, during all phases of the Designated Project, groundwater quality and quantity downstream of the tailings storage facility site D, open pit, west waste rock dump and low-grade ore stockpile to confirm that groundwater quantity and quality parameters are at or below the values identified by the Proponent in the modelled predictions in Section 5 of Blackwater Gold Project: Additional Water Quality Model Sensitivity Scenario (July 20, 2017) and Section 3 of Blackwater Gold Project: Water Treatment Responses for Comments 1266, 1270, 1271, 1272, and 1273 (February 15, 2017) for nitrite and contaminants of potential concern, and to verify the effectiveness of water management measures. |  | 4.0 Monitoring Groundwater Quality and Quantity   |

## 3.1 Monitoring and Analysis

As outlined in Table 3-1 above, detailed regarding the reporting period monitoring activities done in support of condition 3.15 are provided in Appendix 4. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 3-2 summarizes the monitoring, results, and recommendations for work done in those areas required by condition 3.15, it also specifies where further information on each item can be found in the Appendices.

Table 3-2: Summary of DS condition 3.15 follow-up monitoring (Blackwater Gold Ltd, 2026a)

| Monitoring   | Survey/Methodology               | Timing                           | Results   | Adaptive Management/Recommendation  |
|--|----------------------------------|----------------------------------|---|---|
| <b>Davidson Creek Flows – Comparison to Environmental Assessment</b>       | <b>Appendix 4, Section 2.3.3</b> | <b>Appendix 4 Section 2.3.3</b>  | <p><b>Appendix 4 Section 2.3.3</b></p> <p>Observations of flows below the applicable Construction Instream Flow Needs (CIFN) occurred in January and March 2025. Those instances were reviewed, mitigative actions taken, and learnings adopted to prevent re-occurrence where possible. These events were not the result of water usage, or storage, to support construction or operations, but the result of conditions (i.e.: low water level, malfunction of the pump operating system, and freezing conditions) encountered while operating the DCDS.</p>  | <p><b>Appendix 4 Section 2.3.5</b></p> <p>Actions taken to address those conditions proved to be effective, as they resulted in flows meeting CIFN.</p>   |
| <b>Davidson Creek Temperature – Comparison to Environmental Assessment</b> | <b>Appendix 4, Section 2.3.4</b> | <b>Appendix 4 Section 2.3.4</b>  | <p><b>Appendix 4 Section 2.3.4</b></p> <p>Temperatures were within the <math>\pm 1^{\circ}\text{C}</math> screening thresholds at ST-08 KO throughout 2025.</p>   | <p><b>Appendix 4 Section 2.3.5</b></p> <p>None.</p>   |
| <b>Monitoring Water Quality</b>  | <b>Appendix 4, Section 3.2</b>   | <b>Appendix 4, Section 3.4.1</b> | <p><b>Appendix 4, Section 3.5</b></p> <p>In summary, monitoring indicated changes in water quality at Davidson Creek and Creek 661 due to construction and operation activities (e.g., TSS laden water release, clearing activities, dust plume event, diversions from the non-contact water, and unrecovered seepage from the TSF-C) as well as overland flow over the fire-impacted areas. While changes in water quality were also observed at Chedakuz Creek, these changes were also likely influenced by non-mine related sources (e.g., forest harvesting, road/trail networks, cattle grazing) and flow over the wildfire-impacted areas.</p> <p>Water quality parameter concentrations for many metals in Davidson Creek exceeded the WQG-AL and exceedances were generally higher than baseline observations. In Creek 661 and Chedakuz Creek, except for dissolved zinc in Creek 661, WQG-AL exceedances were a similar frequency and magnitude when compared to baseline. Many parameter concentrations were outside the range predicted in the EA and/or the 2022 model. Though in Chedakuz Creek, many parameters were not greater at near-field sites and therefore are not likely attributed to the Mine. The observed changes did not always align with the potential effects identified in the EA. However, the potential for Minerelated changes in water quality during construction activities are primarily through increases in TSS and particulate-bound metals due to earthworks activities, which are not accounted for in source terms used in the mass-balance surface water quality model. These issues are not unusual for projects in the phases with construction activities and are not unique to the Mine. In</p> | <p><b>Appendix 4, Section 3.5</b></p> <p>BW Gold implemented a number of mitigations throughout 2025 to address high concentrations of some metals observed in Davidson Creek (i.e., dissolved cobalt) and Creek 661 (i.e., copper, cadmium, and zinc). For Davidson Creek additional TSF-C seepage monitoring, seepage capture and pumpback, additional groundwater well monitoring, and site and engineering design investigations for the ECD, Northern Diversion, and TSF-D.</p> <p>Mitigations applied in response to changes in Davidson Creek water quality are expected to be applicable to Chedakuz Creek.</p> <p>Fugitive dust mitigation measures for site (in accordance with the Air Quality and Fugitive Dust Management Plan) and for the ore stockpile (i.e., operational spray bars installed at the primary crusher, the conveyor, and the ore stockpile drop points) were implemented and it is planned to construct a cover on the crushed ore stockpile.</p> |

| Monitoring  | Survey/Methodology                    | Timing                                | Results  | Adaptive Management/Recommendation  |
|---|---------------------------------------|---------------------------------------|--|---|
| <p><b>Monitoring Groundwater Quality and Quantity</b></p> | <p><b>Appendix 4, Section 4.2</b></p> | <p><b>Appendix 4, Section 4.2</b></p> | <p>addition, the EA did not consider the potential for wildfire activity in catchments adjacent to the Mine.</p> <p><b>Appendix 4, Section 4.4</b></p> <p>Groundwater level and quality data suggest influence of mining activities downstream of TSF C in 2025. Increases in groundwater level and changes in groundwater quality indicative of TSF seepage were identified at locations monitoring the buried glaciofluvial (sand and gravel) deposit immediately downgradient of the TSFA which was identified to be a potential pathway for seepage from TSF C in the baseline report and groundwater modelling completed for the Joint MA/EMA Application.</p> <p>Groundwater quality samples collected from a sentinel monitoring well located between the TSF and the pumping wells provides an indication of TSF C seepage water quality upstream of mitigations. Many parameter concentrations in samples collected during the last quarter of 2025 from this monitoring well were outside the range predicted in the EA and/or the 2022 model for TSF C seepage and above the Contaminated Sites Regulation aquatic life (CSR-AL) standards in the last quarter of 2025 for nitrite, cyanide (WAD) and dissolved cobalt, nickel, and silver. Samples collected from monitoring wells located downgradient of the pumping wells reported concentrations below CSR-AL standards after implementing additional mitigations in October and November 2025. Groundwater quality changes indicative of TSF seepage were not observed at monitoring wells located downgradient of the IECD.</p> <p>In the Stockpiles Area, sulphate and nitrate concentrations were measured at concentrations elevated above background in an early October sample at monitoring well MW23-03S. Concentrations decreased in follow-up samples collected late-October and December. The groundwater chemistry at the monitoring well is suspected to be influenced by the placement of blasted non-acid generating (NAG) waste rock on the haul road immediately adjacent to the monitoring well. The observed concentrations remained orders of magnitude below CSR-AL standards. No other monitoring wells in the Stockpiles Area exhibited changes in water quality attributed to Mine development and no CSR-AL standard exceedances were reported.</p> <p>Groundwater quality in the Plant Site and Camp Areas and at background monitoring sites remained consistent with historical conditions and below CSR-AL standards. No changes to groundwater flow directions or pathways attributable to the Mine were observed in these areas. Measured groundwater concentrations in these areas remained less than model predicted concentrations.</p> | <p><b>Appendix 4, Section 4.4</b></p> <p>Water quality parameters monitored as part of the groundwater TRP provided an early indication of TSF seepage conditions. BWG implemented a number of mitigations downgradient of TSF C since the groundwater TRP was activated, including continuous operation of pumping wells PW24-01 and PW24-01 screened in the buried glaciofluvial deposits and operation of pumps in two surface sumps.</p> <p>Additional mitigations have been implemented in 2026 to increase seepage capture, including initiating pumping from three new wells installed at the end of 2025. Site investigations and engineering design are underway to construct additional seepage collection measures downgradient of TSF C (i.e., the ECD and interception trenches) and BW Gold plans to commence construction of these structures in 2026.</p> |

| Monitoring | Survey/Methodology | Timing | Results   | Adaptive Management/Recommendation |
|------------|--------------------|--------|---|------------------------------------|
|            |                    |        | <p>Groundwater level responses to development of the Open Pit were not observed in the water level records at GMP monitoring sites in 2025. Open Pit dewatering is accomplished using groundwater dewatering wells and a pit sump to collect surface water.</p> |                                    |

## 4 Fish Habitat (3.16)

The fish and fish habitat *Follow-up Programs for Condition 3.16 of the Blackwater Mine Project Decision Statement Issued under Section 54 of the Canadian Environmental Assessment Act, 2012* (Palmer, 2023b) was developed to address the conditions outlined in condition 3.16 of the DS. It was designed to first characterize baseline conditions for each of the indicators listed in the condition, and then monitor those indicators during all phases of the Mine to:

- a) Conduct, prior to the commissioning of the freshwater supply system (FWSS) as the main mitigation measure for loss of water in Davidson Creek, fish habitat and quality surveys in the Tatelkuz Lake littoral zone
- b) Monitor Tatelkuz Lake littoral zone for the commissioning of the freshwater supply system until decommissioning.
- c) Monitor water flows in lower Chedakuz Creek between Tatelkuz Lake and the confluence with Davidson Creek during the open water season from Construction until Decommissioning.

Based on the progress of the Mine to date (Section 1.1), the reporting period field programs collected information intended to represent an updated baseline for fish and fish habitat to inform long-term monitoring under this condition. The programs and their results are presented in *Follow-Up Programs for Condition 3.16 Annual Report 2025* (Appendix 5).

This section provides an overview of monitoring, results, and adaptive management that occurred during the reporting period to support compliance with DS 3.16. Full details can be reviewed in the documents listed above. Table 4-1 below summarizes this condition of the DS and where the full details can be found in the associated appendix of this document.

Table 4-1: DS condition 3.16 follow-up monitoring

| Condition No. | Condition   | Appendix   | Section   |
|---------------|---|--|---|
| <b>3.16.</b>  | The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to fish habitat in Tatelkuz Lake and Chedakuz Creek. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall: | Described in the <i>Follow-up Programs for Condition 3.16 of the Blackwater Mine Project Decision Statement Issued under Section 54 of the Canadian Environmental Assessment Act, 2012</i> (Palmer, 2023b) |   |
| <b>3.16.1</b> | Conduct, prior to the commissioning of the freshwater supply system, fish habitat quantity and quality surveys in the Tatelkuz Lake littoral zone;  |  | 2.0 Tatelkuz Lake   |
| <b>3.16.2</b> | Monitor the Tatelkuz Lake littoral zone from the commissioning of the freshwater supply system until decommissioning; and   | Appendix 5: <i>Follow-Up Programs for Condition 3.16 Annual Report 2025</i>  | Not applicable as FWSS has not yet been constructed or commissioned |
| <b>3.16.3</b> | Monitor water flows in Chedakuz Creek between Tatelkuz Lake and the confluence with Davidson Creek during the open water season from construction until decommissioning.  |  | 3.0 Lower Chedakuz Lake   |

## 4.1 Monitoring and Analysis

As outlined in Table 4-1 above, detailed regarding the reporting period monitoring activities done in support of condition 3.16 are provided in Appendix 5. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 4-2 below summarizes the monitoring results and recommendations for work done in Tatelkuz Lake and Lower Chedakuz Creek, it also specifies where further information on each item can be found in the Appendix.

The results of these field programs provide a basis for long-term monitoring to determine changes in fish abundance and habitat during the Mine.

Table 4-2: Summary of DS condition 3.16 follow-up monitoring (Triton, 2026b)

| Monitoring  | Survey/Methodology   | Timing   | Results   | Adaptive Management/Recommendations  |
|---|--|--|---|--|
| Lower Chedakuz Creek Fish and Fish Habitat Monitoring | Appendix 5, Section 3.1.2<br>Overwintering Fish Habitat                | March 9, 2025  | Appendix 5, Section 3.1.5<br>Winter habitat availability in Lower Chedakuz Creek was assessed via measurements of snowpack thickness, ice depth, and water quality measurements. Dissolved oxygen levels were generally high and above the minimum BC water quality guidelines for Fish and Aquatic Life. Based on observed conditions, it is likely Lower Chedakuz Creek is snow and ice free all year near the confluence with Tatelkuz Lake. | Appendix 5, Section 3.1.6<br>No additional sampling or analyses other than those described in the FUP for Condition 3.16 is recommended.   |
|   | Appendix 5, Section 3.2.2<br>Summer Fish Habitat                       | July 18, 2025  | Appendix 5, Section 3.2.5<br>Fish Habitat Assessment Procedures (FHAP) and in situ water quality sampling were completed in Lower Chedakuz Creek. Seven distinct habitat units, consisting of four glides and three pools, were identified.   | Appendix 5, Section 3.2.6<br>It is recommended that the FHAP surveys be discontinued and alternative approaches to habitat monitoring be considered. The current FHAP methodology is strongly influenced by observer interpretation and short-term environmental variability (e.g., flow, turbidity) resulting in low repeatability and inconsistent data across years. These limitations reduce the method's ability to detect subtle or cumulative habitat changes associated with Mine effects, making it poorly suited for robust effects assessments. Habitat changes may be observed earlier by monitoring flow levels in Lower Chedakuz Creek.  |
|   | Appendix 5, Section 3.3.2<br>Summer Fish Community and Abundance       | Electrofishing: July 9 – 10, 2025<br>Minnow Trapping: September 17, 2025 | Appendix 5, Section 3.3.5<br>Abundance and distribution of immature and small-bodied fish within Lower Chedakuz Creek were assessed via electrofishing and minnow-trapping surveys. Abundance estimates ranged from 5 to 16 fish per site. No significant differences in minnow trapping catch per unit effort (CPUE) among years was detected.   | Appendix 5, Section 3.3.6<br>For future field programs, it is recommended that the timing of the minnow trapping fish sampling component be adjusted to late summer or early fall, when water temperatures are lower to improve catch rates and lower potential handling stress on captured fish. Sampling in late August or early September would provide comparable timing to sampling conducted in 2022 through 2025.<br><br>It is again recommended that the three-pass depletion electrofishing fish sampling component be discontinued. Electrofishing efficiency and effectiveness proved difficult to achieve due to the large channel size in Lower Chedakuz Creek. Fish were easily able to evade capture regardless of the number of electrofishing passes completed, rendering depletion difficult to achieve. The resulting abundance estimates likely do not reflect the actual abundance of fish species inhabiting Lower Chedakuz Creek. |
|   | Appendix 5, Section 3.4.3<br>Kokanee Summer Spawner and Redd Abundance | July 22 and 29, 2025<br>August 5, 12, 19, and 26, 2025                   | Appendix 5, Section 3.4.5<br>Visual spawner surveys were completed to determine the abundance of mature Kokanee in the section of Lower Chedakuz Creek between Tatelkuz Lake and the confluence with Davidson Creek. Similarly to previous years, no spawning Kokanee or Kokanee redds were observed. Limited   | Appendix 5, Section 4<br>For future field programs, it is recommended that the Kokanee spawner surveys be discontinued in Lower Chedakuz Creek between the outlet of Tatelkuz Lake   |

|  |   |  |   |   |
|--|---|--|---|---|
|  |   | September 2, 9, and 16, 2025   | observations of holding/migration Kokanee were made suggesting that this section of Lower Chedakuz Creek is primarily used for migration/holding rather than spawning.  | and the confluence with Davidson Creek (CC_3.16). The lack of spawning observed during multiple years of surveys in this section indicate that the value of completing visual spawner surveys in this section is relatively limited.                      |
| Tatelkuz Lake Fish and Fish Habitat Monitoring | Appendix 5, Section 2.1.2<br>Limnology and Winter Ice Conditions              | Habitat Assessment: March 8, 2025<br><br>In-situ Water Quality: March 8, 2025<br><br>Limnology – Vertical Profile + Water Sample: March 8, June 3, August 20, and October 30, 2025 | Appendix 5, Section 2.1.4<br>Tatelkuz Lake physical limnology and winter ice condition surveys occurred at one mid-lake sampling location (TL LIM3) and assessments of winter ice conditions and in situ water quality measurements occurred at four nearshore sampling locations (TL BMC1 – TL BMC4). Tattelkuz Lake was thermally stratified in June and August 2025. The vertical profiles indicated that the lake stratification is different than previous years due to natural variability. Dissolved oxygen concentrations at the nearshore locations supported the previously collected data indicating that Tattelkuz Lake contains suitable overwintering habitat for Brassy Minnow.  | Appendix 5, Section 2.1.5<br><br>No additional sampling or analyses other than those described in the FUP for Condition 3.16 is recommended.  |
|  | Appendix 5, Sections 2.2.2, 2.2.3 and 2.2.4<br>Littoral Fish and Fish Habitat | Littoral Habitat: August 13, 16, and 17, 2025<br><br>Fish Community and Abundance: July 14-15, 2025 and August 12-15, 2025<br><br>UAV mapping: August 18 and October 13, 2025      | Appendix 5, Sections 2.2.3.4 and 2.2.4.4<br>Littoral habitat conditions were documented at eleven sites around Tattelkuz Lake. Overall, the average percentage of cover was greater in the 2025 survey than in the 2023 survey at all sites except two. All sampling locations were determined to provide adequate habitat for Brassy Minnow with habitat suitability indexes above 0.5.<br><br>Fish community and abundance sampling occurred in July 2025, using beach seines to capture larval stage fish, and then again in August 2025 targeting larger fish. A total of 1,915 fish were captured during these sampling programs. During the July sampling, CPUE ranged 0.03 fish/m <sup>2</sup> to 2.38 fish/m <sup>2</sup> , while CPUE for the August program ranged from 0.04 fish/m <sup>2</sup> to 3.73 fish/m <sup>2</sup> . High mortality rates were experienced during the July sampling.<br><br>UAV mapping was undertaken in 2025 by BW Gold Survey to document existing conditions. | Appendix 5, Section 2.2.5<br><br>Due to continued high mortality rates and limited identifiable features on small larval fish, it is recommended that the larval fish sampling program be removed from the littoral fish community and abundance program. |

## 5 Migratory Birds (4.5)

The purpose of the *Wildlife Mitigation and Monitoring Plan* (WMMP) (ERM, 2023b) is to manage impacts on wildlife in the Blackwater Mine area during Construction, Operations, Closure, and Post-closure.

The *2025 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2026a) (Appendix 6) summarizes and presents the results of the follow up programs and monitoring of mitigation measures during 2025. This follow-up program includes monitoring for migratory bird species required by condition 4.5 of the DS in sections 3.6 (raptors), 3.7 (waterbirds), and 3.8 (upland birds):

**4.5** The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of all mitigation measures to avoid harm to migratory birds, including migratory birds that are listed species at risk, their eggs and nests. The follow-up program shall include the mitigation measures used to comply with condition 4.1 to 4.4. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.

### 5.1 Monitoring and Analysis

As outlined above, details regarding the monitoring activities done in support of condition 4.5 are provided in Appendix 6. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results, and recommendations. Table 5-1 below summarizes the monitoring results and recommendations and identifies where further information on each item can be found in the Appendix.

Table 5-1: Summary of DS condition 4.5 follow-up monitoring (ERM, 2026a)

| Monitoring           | Survey/Methodology  | Timing                   | Results  | Adaptive Management/Recommendations |
|----------------------|---|--------------------------|--|-------------------------------------|
| Pre-clearing Surveys | Appendix 6, Section 2.1.2   | January - December, 2025 | <b>Appendix 6, Section 2.1.3 and Appendix C</b><br>Pre-clearing surveys for breeding birds and stick nests were completed between February 27 to December 20, 2025.  | Appendix 6, Appendix B-2<br>None.   |
|                      | Appendix 6, Section 2.2.2<br>Habitat loss (ERM, 2026a)                | January – December 2025  | <b>Appendix 6, Section 2.2.3</b><br>There is no overlap between the reporting period clearing limits and short-eared owl suitable habitat.   | Appendix 6, Appendix B-2<br>None.   |
| Raptors              | Appendix 6, Section 2.3.3.1<br>Incidental observations (ERM, 2026a)   | January – December 2025  | <b>Appendix 6, Section 3.7.3.1</b><br>In 2025, BW Gold personnel and WMMP monitoring programs recorded 314 incidental observations of raptors, totalling an estimated 423 individuals. Four incidental raptor detections were recorded by Mine personnel in the Blackwater Wildlife Sighting Log in 2025 from two species: common raven and northern hawk owl.<br><br>The remaining 310 observations were incidentally recorded during the 2025 WMMP wildlife compliance monitoring field season, with 260 of these observation events being images captured during the Kokanee Wildlife Camera monitoring program. The most commonly observed incidental raptor species were common raven (n = 264) and bald eagle (n = 129), with most of these detections being captured by Kokanee Wildlife Cameras.<br><br>No raptor species of conversation concern were incidentally observed in 2025. (ERM, 2026a)   | Appendix 6, Appendix B-2<br>None.   |
| Waterbirds           | Appendix 6, Section 2.2.2<br>Habitat loss (ERM, 2026a)                | January – December 2025  | <b>Appendix 6, Section 2.2.3</b><br>Between January and December 2025, habitat loss for Greater Yellowlegs ( <i>Tringa melanoleuca</i> ) was 126 ha and habitat loss for the Wilson’s Snipe ( <i>Gallinago delicata</i> ) was 37 ha. (ERM, 2026a)  | Appendix 6, Appendix B-2<br>None.   |
|                      | Appendix 6, Section 2.4<br>Facility waterbody monitoring (ERM, 2026a) | January – December 2025  | <b>Appendix 6, Section 2.4</b><br>Six facility water structures were operational in 2025 including the WMP, IECD, TSF, CWTP, LGO and Pit Sump. Facility water structure monitoring, including camera deployment, visual amphibian surveys, and water quality monitoring, was completed for facility water structure that were operational in 2025.<br><br><b>Appendix 6, Section 2.4.3.2</b><br>Wildlife cameras were deployed at all operational facility water structures in 2025, and were programmed to capture motion-triggered photos to determine wildlife usage, focussing on birds and furbearers. Analysis was completed for camera data collected between January 1 to December 30, 2025, although cameras were only deployed for the dates in which facility water structures were operational which varied in 2025. Additionally between one and three cameras were deployed at any give time at facility water structures. As a result, the number of functional days, representing camera effort, across all cameras deployed in 2025 were 629 for the WMP, 234 for the IECD, 389 for the TSF, 62 for the CWTP and LGO, and 24 at the Pit Sump.<br><br>Wildlife were detected at the WMP and TSF during the functional period of the cameras. (ERM, 2026a). | Appendix 6, Appendix B-2<br>None.   |

| Monitoring          | Survey/Methodology   | Timing   | Results   | Adaptive Management/Recommendations      |
|---------------------|--|--|---|--|
|                     | <b>Appendix 6, Section 3.8.2.1</b><br>Waterbird population monitoring (ERM, 2026a) | May 13 – 15, 2025 (Spring pairing) (ERM, 2026a)    | <b>Appendix 6, Section 3.8.3.1</b><br>Spring and fall surveys are completed for both the Mine and Transmission Line LSA as it targets identifying staging locations whereas summer surveys are completed just for the Mine LSA as it targets identifying nesting and breeding locations.  | <b>Appendix 6, Appendix B-2</b><br>None. |
|                     |  | July 18 – 19, 2025 (Summer brooding) (ERM, 2026a)  | Bird abundance was highest during spring pairing (n = 958) followed by fall migration (n = 906) and summer brooding (n = 253). Species richness was highest during spring pairing (n = 18) followed by fall migration (n = 13) and summer brooding (n = 9). Lower bird abundance and species richness in the summer is likely attributed to surveys only being completed for the Mine LSA, opposed to the spring and fall surveys which included both the Mine and Transmission Line LSA. Both bird abundance and species richness were lower in the potential impact zone than the control zone for all survey periods. (ERM, 2026a)   |  |
|                     |  | October 8 – 10, 2025 (Fall migration) (ERM, 2026a) |   |  |
|                     | <b>Appendix 6, Section 2.3.3.1</b><br>Incidental observations (ERM, 2026a)         | January – December 2025 (ERM, 2026a)               | <b>Appendix 6, Section 3.8.3.2</b><br>In 2025, BW Gold personnel and WMMP monitoring programs recorded 37 incidental observations of waterbirds, totalling an estimated 163 individuals. Detections included four identified species and three unspecified species, with mallard being the most commonly observed species (14 observations totalling 109 individuals). One incidental waterbird detection was recorded by Mine personnel in the Blackwater Wildlife Sighting Log in 2025, including two unspecified ducks in the IECD.<br><br>The remaining 36 detections were recorded during WMMP Monitoring programs, with 89% detections (n = 32) being made by Kokanee Wildlife Cameras<br><br>Great blue heron (n = 13 individuals) was the only species of conservation concern that was observed incidentally. (ERM, 2026a) | <b>Appendix 6, Appendix B-2</b><br>None. |
|                     | <b>Appendix 6, Section 2.2.2</b><br>Habitat loss (ERM, 2026a)                      | January – December 2025                            | <b>Appendix 6, Section 2.2.3</b><br>In 2025, habitat loss for interior forest birds was 53 ha. (ERM, 2026a)   | <b>Appendix 6, Appendix B-2</b><br>None. |
| <b>Upland Birds</b> | <b>Appendix 6, Section 3.9.2.1</b><br>Upland bird population monitoring            | June 14 – June 22, 2025<br>July 21, 2025           | <b>Appendix 6, Section 3.9.3.1</b><br>In total, 13 upland bird population monitoring transects were surveyed, with five located in the potential impact zone (within 200 m of the predicted Mine footprint) and eight in the control zone (200 m – 5km). Five sample points were completed along each transect, with a total of 65 sample points completed.<br><br>A total of 314 individual upland birds were recorded across 24 species and two unknown species. The most commonly observed species were yellow-rumped warbler (n = 72), dark-eyed junco (n = 71), Swainson's thrush (n = 41), and American robin (n = 27), golden-crowned kinglet (n = 18), and Lincoln's sparrow (n = 12).<br><br>Olive-sided flycatcher (n = 1) was the only upland bird species of conservation   | <b>Appendix 6, Appendix B-2</b><br>None. |

| Monitoring   | Survey/Methodology                       | Timing   | Results                                  | Adaptive Management/Recommendations |
|--|--|--|--|-------------------------------------|
| <b>Appendix 6, Section 3.9.2.2</b><br>Common nighthawk monitoring                | June 14 – June 28, 2025                  | <p>concern recorded in 2025.</p> <p>Overall, species richness varied between 4 and 11 species per transect (average = 6 species) and bird abundance varied between 13 and 39 birds per transect (average = 24 individuals). Species richness and bird abundance generally followed similar trends, where transects with higher species richness also had high abundance. There were minimal differences in both bird abundance and species richness between control (average richness = 6.1 species; average abundance = 21.8 individuals) and potential impact sites (average richness = 6.8 species; average abundance = 26.6 individuals) in 2025. (ERM, 2026a)</p> <p><b>Appendix 6, Section 3.9.3.2</b><br/>           A total of 20 ARUs were deployed, with seven located in the potential impact zone (within 200 m of the predicted Mine footprint) and 13 in the control zone (200 m – 5km).<br/>           A total of 204 common nighthawk detections from four ARUs were observed after cluster analysis and manual vetting. All detections were of common nighthawk calls and occurred in both the control and potential impact zones. One site, located in the north-western portion of the potential impact zone, accounted for 93% (n = 190) of detections. (ERM, 2026a)</p> | <b>Appendix 6, Appendix B-2</b><br>None. |                                     |
| <b>Appendix 6, Section 3.9.2.4</b><br>Clark’s nutcracker monitoring (ERM, 2026a) | June 17 – 21, 2025<br>July 20 – 21, 2025 | <p><b>Appendix 6, Section 3.9.3.4</b><br/>           Clark’s nutcracker call playbacks were completed along 10 transects, with five transects in both the potential impact and control areas. Surveys detected a total of 13 Clark’s nutcracker from five transects, four transects in the Mount Davidson potential impact zone (n = 12), and one transect in the control zone (n = 1). (ERM, 2026a)</p>   | <b>Appendix 6, Appendix B-2</b><br>None. |                                     |
| <b>Appendix 6, Section 3.9.2.3</b><br>Swift and swallow monitoring (ERM, 2026a)  | June 14 – 16, 2025                       | <p><b>Appendix 6, Section 3.9.3.3</b><br/>           A total of 19 sites were surveyed for swallows and swifts, with 10 in the potential impact zone around the mine site infrastructure and nine in the control zone. A total of 31 individual swallows from two species were observed, including barn swallow (n = 25) and tree swallow (n = 6). Activity was primarily associated with or near buildings with vaulted roof covers supported by wooden beams. (ERM, 2026a)</p>   | <b>Appendix 6, Appendix B-2</b><br>None. |                                     |
| <b>Appendix 6, Section 2.3.3.1</b><br>Incidental observations (ERM, 2026a)       | January – December 2025                  | <p><b>Appendix 6, Section 3.9.3.5</b><br/>           In 2025, BW Gold personnel and WMMP monitoring programs recorded 190 incidental observations of upland birds, totalling an estimated 226 individuals. The most commonly observed bird species were golden-crowned kinglet (n = 29), American robin (n = 29), dark-eyed junco (n = 26), and chipping sparrow (n = 22). Nine incidental upland bird detections were recorded by Mine personnel in the Blackwater Wildlife Sighting Log in 2025.</p> <p>Of the 190 detection events, 181 were recorded during WMMP Monitoring programs (Table 3.9-5; Appendix E), with 65% detections (n = 111) made during Clark’s nutcracker surveys. Additionally, three unspecified bird nests were recorded during spring waterbird surveys in May. None of the nests were in locations where avoidance or mitigation due to Mine activity was required.</p> <p>Incidental observations included four nests near the Mine, including one unspecified species nest located near the construction camp and three barn swallow nests within or on a maintenance building. Monitoring was completed</p>   | <b>Appendix 6, Appendix B-2</b><br>None. |                                     |

| Monitoring | Survey/Methodology | Timing | Results  | Adaptive Management/Recommendations |
|------------|--------------------|--------|--|-------------------------------------|
|            |                    |        | <p>for all four incidentally identified nests.</p> <p>Two species listed on the SARA (2002) were incidentally recorded, including olive-sided flycatcher, and barn swallow. (ERM, 2026a)</p> |                                     |

## 6 Wetlands (5.5)

The *Wetland Management and Offsetting Plan (WMOP)* (ERM, 2024) was developed to address a number of conditions, including those outlined in condition 5.5 of the DS. It was designed to monitor the aquatic receiving environment to provide the information needed to achieve the following objectives:

- Protect all wetlands until additional baseline studies can be complete;
- Avoid all potential wetland areas as mapped by Terrestrial Ecosystem Mapped (TEM) during early works and up until the necessary baseline information has been collected and reported out on;
- Provide pre-construction surveys to identify the extent and flag 30 m buffers around all TEM wetlands during early works and up until the necessary baseline information has been collected by a QP. Work with the IEM to schedule site visits when tree clearing is taking place in proximity to flagged wetland areas. Aboriginal Group Monitors on rotation at the time of the surveys will be invited to participate in surveys;
- Establish workplan objectives for baseline fieldwork to be conducted in the summer of 2022; and,
- Identify and establish a wetland offsetting program at Mathews Creek Ranch and other areas as required to meet offsetting objectives.

The *2025 Wetland Management and Offsetting Plan Annual Report* (ERM, 2026b) (Appendix 7) has been developed to summarize activities undertaken with this follow-up program.

This section provides an overview of monitoring, results, and adaptive management that occurred during the reporting period support compliance with DS 5.5. Full details can be reviewed in Appendix 7. Table 6-1 below summarizes this condition of the DS and where those details can be found in the associated appendix of this document.

Table 6-1: DS condition 5.5 follow-up monitoring

| Condition No. | Condition   | Appendix  | Section  |
|---------------|---|---|--|
| 5.5.          | <p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the predictions of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on wetland functions and to determine the effectiveness of the mitigation measures as it pertains to wetlands. The Proponent shall implement the follow-up program during from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall:</p> | Described in the WMOP (ERM, 2024)                                     |  |
| 5.5.1.        | <p>Conduct pre-construction surveys within the mine site to confirm the absence of red or blue-listed wetlands. The Proponent shall provide the results of the survey to the Agency and to Indigenous groups prior to the start of construction. If the results of the survey demonstrate the presence of red or blue-listed wetlands within the mine site, the Proponent shall develop, prior to construction, and implement additional mitigation measures;</p>   |   | <p>3.1 Wetland Mitigation<br/>3.4 Pre-construction Wetland Surveys<br/>Appendix A Wetland Mitigation and Management Measures</p>   |
| 5.5.2.        | <p>Monitor changes to wetland functions of wetlands located within the mine site and remaining after vegetation clearing required to construct project components during all phases of the Designated Project; and</p>  | Appendix 7: 2025 Wetland Management and Offsetting Plan Annual Report | <p>3.5 Change to Wetland Extent and Function at the Mine<br/>4.0 Long-term Wetland Monitoring Results<br/>Appendix B Year 1 (2025) As-Built Wetland Loss Maps<br/>Appendix C Year 1 (2025) As-Built Wetland Extent and Function Loss by Wetland Area</p> |
| 5.5.3.        | <p>Monitor all compensatory wetland sites at a minimum annually, to ensure they meet or exceed performance standards for wetland functions established pursuant to condition 5.4 from the start of compensation until wetland functions are attained.</p>   |   | <p>3.6 Change to Wetland Extent and Function at Offsetting Sites<br/>4 Long-term Wetland Monitoring Results</p>  |

## 6.1 Monitoring and Analysis

As outlined in Table 6-1 above, detailed regarding the monitoring activities done in support of condition 5.5 are provided in Appendix 7. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 6-2 below summarizes the monitoring, results, and recommendations for work done in those areas required by condition 5.5, it also specifies where further information on each item can be found in the Appendix.

Table 6-2: Summary of DS condition 5.5 follow-up monitoring (ERM, 2026b)

| Monitoring   | Survey/Methodology             | Dates            | Results Summary   | Adaptive Management/Recommendations  |
|--|--------------------------------|------------------|---|--|
| <b>Wetland Mitigation</b>                              | <b>Appendix 7, Section 3.1</b> | <b>2023-2025</b> | <p><b>Appendix 7, Section 3.1</b><br/>                     BW Gold implemented mitigation measures and best management practices of avoidance, Minimization, and restoration for wetlands in Year 1 (2025). No non-construction activities occurred within the 30-metre buffer of undisturbed vegetation surrounding wetlands at the Mine site in Year 1 (2025).</p>  | <p><b>Appendix, Section 6</b><br/>                     Continue implementation/record of mitigation measures.</p> <p>Continue implementation/record of 30-metre buffer.</p> <p>Engage stakeholders, Indigenous groups and regulators to identify whether any modifications to mitigation measures is needed. Implement additional mitigation measures as described in section 5, Adaptive Management. Implement additional mitigation measures where identified.</p>   |
| <b>Wetland Offsetting</b>                              | <b>Appendix 7, Section 3.4</b> | <b>2023-2025</b> | <p><b>Appendix 7, Section 3.4</b><br/>                     Wetland restoration, enhancement, or creation activities were not completed at offsetting sites in Year 1 (2025); however, wetland and fish habitat offsetting plan budgeting, scheduling, and scope of work were prepared in 2025, for work commencement planned in 2026 at Mathews Creek Ranch and Dykam Ranch offsetting sites.</p>   | <p><b>Appendix 7, Section 6</b><br/>                     Progress active wetland restoration/enhancement at Mathews Creek Ranch and Dykam Ranch offsetting sites as described in the WMOP.</p>   |
| <b>Change to Wetland Function and Loss at the Mine</b> | <b>Appendix 7, Section 3.5</b> | <b>2023-2025</b> | <p><b>Appendix 7, Section 3.5</b><br/>                     Clearing activities to date (2025) have resulted in 45.25 ha of direct loss in wetland extent and 1,341 in Functional Area (FA), a representation of wetland function. loss in the Mine Area, including bogs, fens, marshes, swamps, and shallow open water. Blue-listed communities impacted to date include 21.15 ha of Ws07 Spruce – Common Horsetail – Leafy Moss swamp, 0.58 ha of Wf13 Narrow-leaved cotton-grass – Shore Sedge fen, and 0.09 ha of Wf13 Narrow-leaved cotton-grass—Shore Sedge fen.</p> <p>Wetland extent loss to date exceeds predicted cumulative loss at the schedule by 12.03 ha (36%); however, represents 40% of the total of the 113.71 ha predicted wetland extent loss for the Year 23 Full-Build Out Footprint. Wetland function as-built loss to date exceeds predicted cumulative loss at the schedule (Year 1) by 376 FA (39%); however, represents 43% of the total of the predicted wetland function loss for the Year 23 Full-Build Out Footprint.</p> <p>Despite as-built wetland loss exceeding projected Year 1 losses, wetland extent is net positive with extent gains to date exceeding losses by 427.7 ha (9:1 gains to losses) and wetland function is net positive with FA gains to date exceeding losses by 3,213 FA (3:1 gains to losses).</p> | <p><b>Appendix 7, Section 5 and 5.1</b><br/>                     Wetland losses trigger a “high level” response for wetland extent and function in accordance with the trigger action response plan. Responses to these triggers are included a follow-up investigation reflected in Section 5-1.</p> <p>Recommendations include:</p> <ul style="list-style-type: none"> <li>• Continue monitoring.</li> <li>• Update/reconcile predicted footprints and losses at the schedule to reflect updated clearing plans.</li> <li>• Engage stakeholders, Indigenous groups and regulators to identify any modifications to mitigation measures.</li> <li>• Progress active wetland restoration/enhancement at Mathews Creek Ranch and Dykam Ranch offsetting sites as described in the WMOP.</li> </ul> <p>Based on the follow-up investigation results, BW Gold does not anticipate exceeding wetland loss beyond what was predicted in the WMOP at the maximum extent of disturbance. Annual monitoring through the submission of the WMOP Annual Report will confirm these predictions.</p> |
| <b>Change to Wetland Function</b>                      | <b>Appendix 7, Section 3.6</b> | <b>2023-2026</b> | <b>Appendix 7, Section 3.6</b>  | <p><b>Appendix 7, Section 6</b><br/>                     Continue monitoring.</p>  |

**and Loss at the  
Offsetting Sites**

Wetland function gains to date at Mathews Creek Ranch for restoration are from passive restoration (453 FA); however, no active wetland restoration gains have been realized. Baseline wetland surveys at Dykam Ranch offsetting site were completed August 2025, with mapping and evaluation of baseline wetland function to be completed in 2026.

Wetland gains as a result of conservation have been achieved for Mathews Creek Ranch through BW Gold's securement of fee-simple ownership (225 ha) and Dykam Ranch through BW Gold's securement of a 99-year statutory right of way and license agreement (248 ha).

## 7 Country Foods (6.11) (6.13)

The *Country Foods Monitoring Plan* (CFMP) (Blackwater Gold Ltd, 2022a) was developed to address a number of conditions, including those outlined in condition 6.11 of the DS. It was designed to identify and mitigate potential adverse effects on the health of Indigenous Peoples and other land users as a result of the Mine.

The *2025 Country Foods Monitoring Plan Annual Report* (Entia Environmental Consultants Ltd., 2026) (Appendix 8) has been developed to summarize activities under the CFMP.

Supplementary to the CFMP is the *Country Foods and Socio-economic Conditions Follow-Up Program* (Blackwater Gold Ltd, 2022b), which was developed to address condition 6.13 of the DS. This program is intended to monitor and adaptively manage potential adverse effects on the socio-economic conditions of Indigenous groups as a result of changes to access, availability, and quality of country foods due to the Mine components and activities. The *2022 Country Foods and Socio-economic Conditions Follow-up Program: Current Conditions Report* (ERM, 2023a) has been developed to understand baseline conditions and provide context for identifying change, this document remains in draft as the efforts to engage with LDN and UFN continue.

This section provides an overview of monitoring, results, and adaptive management that occurred during the reporting period to support compliance with DS 6.11 and 6.13. Further details can be reviewed in Appendix 8. Table 7-1 below summarizes this condition of the DS and where the full details can be found in the associated appendix of this document.

Table 7-1: DS condition 6.11 and 6.13 follow-up monitoring

| Condition No. | Condition  | Appendix  | Section                                       |
|---------------|--|---|---|
| 6.11.         | The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the health of Indigenous Peoples caused by changes in concentrations of contaminants of potential concern in water, soil, vegetation and wildlife, including fish, and determine the effectiveness of mitigation measures. As part of the development of the follow-up program, the Proponent shall identify the vegetation and wildlife species that shall be monitored, the locations where the monitoring will be conducted, the contaminants to be monitored and the frequency of the monitoring. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. In doing so, the Proponent shall: | Country Foods Monitoring Plan (Blackwater Gold Ltd, 2022a)  |   |
| 6.11.1        | Monitor, prior to construction, contaminants of potential concern in soil, vegetation, wildlife, including fish and water. The Proponent shall also co-locate soil sampling with vegetation samples and water sampling with fish samples;  |   | 1.1 Background                                |
| 6.11.2        | Monitor, during all phases of the Designated Project, contaminants of potential concern in water, soil, vegetation, and wildlife species;  |   | 3.0 Sampling under the CFMP in 2025           |
| 6.11.3        | If the sampling and monitoring results referred to in condition 6.11.1 and 6.11.2 exceed the predictions made during the environmental assessment, implement any modified or additional mitigation measures pursuant to condition 2.9 based on the results of the follow-up program and update the human health risk assessment identified by the Proponent in Appendix 9.2.2A of the Environmental Impact Statement using the results of the sampling and monitoring. The Proponent shall integrate the current and predicted consumption patterns of each Indigenous group identified during the environmental assessment in the updated human health risk assessment and any updated consumption pattern information provided by Indigenous groups as part of the follow-up program.  | Appendix 8-1: 2025 Country Foods Monitoring Plan Annual Report  | 4.0. Data Analysis Results and Interpretation |
| 6.13          | The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the socio-economic conditions of Indigenous Peoples as a result of changes to access, availability and quality of country foods. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.  | Country Food and Socio-economic Conditions Follow-Up Program<br>Appendix 8-2: 2025 Annual Monitoring Report Country Foods Socio-economic Conditions Follow-up Program (DS 6.13) |   |

## 7.1 Monitoring and Analysis

As outlined in Table 7-1 above, details regarding the reporting period monitoring activities done in support of condition 6.11 and 6.13 is provided in Appendix 8-1 and 8-2. These programs were implemented and developed by a QP, and include detailed summaries of methodologies, study locations, results, and recommendations. Table 7-2 and Table 7-3 below summarize the monitoring results and recommendations, it also specifies where further information on each item can be found in Appendix 8-1 and 8-2.

Table 7-2: Summary of DS condition 6.11 follow-up monitoring (Entia Environmental Consultants Ltd., 2026)

| Monitoring                           | Survey/Methodology                      | Dates                           | Results Summary   | Adaptive Management/Recommendations  |
|--------------------------------------|---|---------------------------------|---|--|
| <p><b>Surface Water Quality</b></p>  | <p><b>Appendix 8-1, Section 3.1</b></p> | <p>January – December 2025</p>  | <p><b>Appendix 8-1, Section 4.1</b><br/>                     Surface water quality was monitored between January and December 2025 at Davidson Creek, Creek 661, Turtle Creek, Chedakuz Creek, Creek 705, Fawnie Creek, Tatelkuz Lake and Kuyakuz Lake. Parameters analyzed in surface water quality were the 18 COPCs (total metals) identified in the Conceptual Site Model (CSM; Entia 2022a) and the Human Health Risk Assessment (HHRA; Entia 2022b).</p> <p>Average concentrations of metals in surface water were below Guideline NPMs for water quality, and therefore, concentrations are below levels of concern for human health. Except for total aluminum and iron, average concentrations of metals were below the Baseline and Predicted NPMs. Based on statistical Before-After Control-Impact (BACI) analysis, the change in aluminum and iron concentrations at impact sites was significantly different to changes at control sites. Based on the assessment, the trigger level under the CFMP for aluminum and iron in surface water was “medium”. Changes in mean concentrations is likely coming from non-contact diversion water from the 2023 fire-impacted areas of the upper Davidson Creek watershed. While there were no discharges of effluent to surface water in 2025, Mine-related sources of increased concentrations of total aluminum and iron may be from the March 2025 release of water containing suspended solids (and metals attached to the solids) from site into Davidson Creek. This release of water happened because of an Erosion and Sediment Control failure upstream. Clearing that was completed upstream of Davidson Creek in May/June 2025 also likely contributed to elevated concentrations in the second and third quarters of 2025 when compared to baseline. Temporary increases in the concentration of total aluminum and iron in Creek 661 were also noted between February and June. The increased concentrations in Creek 661 between February and June may be associated with a plume of potentially acid generating dust from the ore stockpile at the Plant Site; however, concentrations in Creek 661 returned to baseline levels later in the year.</p> <p>Although average total cobalt concentrations in surface water were below the Baseline and Predicted NPMs, increased cobalt concentrations were identified in both surface water in Davidson Creek and groundwater from monitoring wells in the third quarter of 2025. The increase in total cobalt concentrations in Davidson Creek compared to baseline concentrations and concentrations measured in 2023 and 2024 may be attributable to Mine activities, specifically from unrecovered seepage (Mine-influenced groundwater that enters surface water) from the TSF-C and Interim Environmental Control Dam (IECD).</p> | <p><b>Appendix 8-1, Section 5.2</b><br/>                     BW Gold adjusted or implemented mitigation measures for erosion and sediment control, water management, and fugitive dust control. BW Gold put in place spray points at the conveyors from the tertiary crusher to the ore stockpile, spray points and bag houses at the primary and tertiary crusher, and a baghouse at the secondary crusher to control fugitive dust emissions. The 2025 June to December total aluminum concentrations were typically similar to that observed in the same months during the baseline period. Thus, the mitigations that have already been applied to date appear to be successful.</p> <p>Additional management actions include a review and optimization of existing mitigation, evaluation of new mitigation options, implementing a water sampling program to define the magnitude, spatial extent, and reversibility of the effect, and other applicable responses as defined in the AEMP interpretative report for 2025. BW Gold planned/completed mitigations are:</p> <ul style="list-style-type: none"> <li>• Additional monitoring of TSF-C seepage flow paths entering the former Davidson Creek upstream of the future FWR footprint.</li> <li>• Additional monitoring (increase frequency) of installed groundwater wells and installation and monitoring of new groundwater wells downstream of the TSF-C to understand seepage flows and flow paths.</li> <li>• Commencement of operation of two seepage pumpback wells in September 2025.</li> <li>• Capture and pumpback of seepage reporting to a topographic low point downstream of TSF-C.</li> <li>• Installation of four additional seepage pumpback wells (pumping from three of the wells was initiated after end of period in February 2026 and one well remains on stand-by pending monitoring results).</li> </ul> <p>Execution of site investigations and engineering design for the ECD, Northern Diversion and TSF-D which are planned to be constructed in accordance with the mine development sequence and are expected to contribute to seepage capture or routing of clean water away from mine areas.</p> |
| <p><b>Air Quality Monitoring</b></p> | <p><b>Appendix 8-1, Section 3.4</b></p> | <p>January to December 2025</p> | <p><b>Appendix 8-1, Section 4.3</b><br/>                     Meteorological conditions and concentrations of CACs, which includes particulate matter (PM) under 10</p>  | <p><b>Appendix 8-1, Section 4.3</b><br/>                     None.</p>   |

| Monitoring                  | Survey/Methodology      | Dates                     | Results Summary   | Adaptive Management/Recommendations   |
|-----------------------------|-------------------------|---------------------------|---|---|
|                             |                         |                           | <p>microns (PM<sub>10</sub>), PM under 2.5 microns (PM<sub>2.5</sub>), sulfur dioxide, nitrogen dioxide, and carbon monoxide, and were monitored under the AQFDMP in 2025. There were several exceedances of PM<sub>10</sub> and PM<sub>2.5</sub> trigger concentrations in 2025 on June 12, June 24, and between August 29 to September 3. All measured exceedances for PM were attributed to wildfire smoke occurring in the region and outside of the control of the Mine.</p> <p>There were no exceedances of the BC ambient air quality objectives for sulfur dioxide, nitrogen dioxide, and carbon monoxide in 2025.</p>  |   |
| Plant and Berry Quality     | CFMP                    | 2023                      | <p><b>Appendix 8, Section 4.4</b><br/> Analytical data for plant and berry samples analyzed in 2023. For berries, interpretation of the results is difficult as only two samples were obtained in 2023 because there were not many berries available for sampling (hot, dry summer). Other than arsenic in one berry sample, all metals were below the Baseline, Predicted, and Guideline NPMs for berries. The arsenic concentration in one huckleberry sample that was higher than the NPMs appears to be an outlier (an unusual result), as it is higher than any arsenic concentration measured previously and significant changes in arsenic concentrations were not found in air (dustfall), soil, or plants. Thus, based on 2023 monitoring results, the trigger level in the adaptive management framework for soil, plants, and berries is “None”.</p>   | None. Not assessed in 2025. Regular sampling under the CFMP occurs in 2026.   |
| Fish Tissue Quality         | Appendix 8, Section 3.5 | Appendix 8-1, Section 3.2 | Sampling commenced in early-August and ended in late September 2025.  | <p><b>Appendix 8-1, Section 4.2</b><br/> Fish tissue collection sites under the CFMP were control sites on Creek 705 (705-05 and 705-10), Turtle Creek (TC-05 and TC-10; Turtle Creek sites are not considered to be impact sites as there were no construction or Mine-related activities relevant to these areas), Fawnie Creek (FC-01), and Kuyakuz Lake (KL-01), and impact sites on Creek 661 (661-01, 661-05, and 661-10), Davidson Creek (DC-05 and DC-15), and Tatelkuz Lake (TL-01). For fish tissue, average COPC tissue concentrations were below the Baseline, Predicted, and CF Guideline NPMs for fish tissue. Thus, based on 2025 monitoring results, no Mine-related adverse effects to human health would be expected from consumption of fish and the trigger level in the adaptive management framework for fish tissue is “None”.</p> |
| Small Mammal Tissue Quality | CFMP                    | January to December 2025  | <p><b>Appendix 8-1, Section 3.3</b><br/> There are two components to the small mammal tissue sampling under the CFMP, an Indigenous-led program for sampling and laboratory analysis of game animals that are hunted or trapped within the CFMP study area (donated samples); and a small mammal (rodent) sampling program (ERM 2023a).</p> <p>Both components of the program were initiated in 2023 as baseline collection programs. Sampling of small mammals in 2023 was completed to provide baseline or pre-Operations phase data on tissue concentrations of COPCs, as a foundation for future monitoring. There are no human health-based NPMs based on rodent tissue sampling. The small mammal (rodent) sampling program was not conducted in 2025 as it is tied to the soil, plant, and berry sampling program and will be conducted again at the end of Construction / commencement of Operations, as per ERM (2023a), in the summer of 2026.</p> <p>In 2025, BW Gold streamlined the donated sample collection form for the Hunted Game Animal Program that would accompany donated tissue samples to make it easier for participants to fill in and adjusted incentives for participation. No samples were donated under this program in 2025.</p> | <p><b>Appendix 8-1, Section 3.3</b><br/> None.</p>  |

Table 7-3: Summary of DS condition 6.13 follow-up monitoring (ERM, 2026c)

| Monitoring                | Survey/Methodology  | Dates                     | Results Summary  | Adaptive Management/Recommendations   |
|---------------------------|---|---------------------------|--|---|
| Country Food Access       | Appendix 8-2, Section 2.4<br>Change of access to harvesting area(s) due to spatial overlap or intersection with FUP monitoring area | Appendix 8-2, Section 2.4 | <p><b>Appendix 8-2, Section 2.4</b></p> <p>In the reporting year, an improvement in access to plants and berries may have occurred due to wildfires per feedback from an Aboriginal Group Monitor., BW Gold will remain alert to any input received from Indigenous groups regarding any additional influence the Mine has on access routes considering the wildfire impacted areas.</p> <p>Based on available information, there is no evidence that construction activities of the Mine in 2025 have resulted in a change for land users to access country foods harvesting areas.</p> <p>The monitoring findings are aligned with the predicted effect from the environmental assessment.</p>   | <p><b>Appendix 8-2, Section 2.4</b></p> <p>None.</p>  |
|                           | Appendix 8-2, Section 2.4<br>Change in effort (time, expense and risk) required to access alternate harvesting areas                | Appendix 8-2, Section 2.4 | <p><b>Appendix 8-2, Section 2.4</b></p> <p>There is no evidence that the level of effort associated with accessing harvesting areas has changed due to the activities of the Mine in 2025. External conditions (e.g., inflation and the cost of gas) have changed between 2022 and this monitoring year, however there is no indication that these external factors influenced the effort to access harvesting areas.</p> <p>The monitoring findings are aligned with the predicted effect from the environmental assessment.</p>  | <p><b>Appendix 8-2, Section 2.4</b></p> <p>None.</p>  |
| Country Food Availability | Appendix 8-2, Section 2.4<br>Change in availability of country foods  | Appendix 8-2, Section 2.4 | <p><b>Appendix 8-2, Section 2.4</b></p> <p>The 2023 wildfire may have improved the availability of plants and berries in this monitoring year per feedback from an Aboriginal Group Monitor. However, this change is not associated with the construction activities of the Mine. Invasive species were not reported to have displaced native plant species that serve as country foods. BW Gold did not receive information from Indigenous groups regarding changes to plant/berry availability due to the Mine in 2025.</p> <p>No vehicles/driving associated with the Mine were confirmed to have resulted in wildlife injury or fatality in 2025. BW Gold did not receive information from Indigenous groups regarding changes to wildlife or fish availability due to the Mine in 2025.</p> <p>The monitoring results are aligned with the predicted effect from the environmental assessment.</p>   | <p><b>Appendix 8-2, Section 2.5</b></p> <p>None.</p>  |
| Country Foods Quality     | Appendix 8-2, Section 2.4<br>Change in quality of country foods   | Appendix 8-2, Section 2.4 | <p><b>Appendix 8-2, Section 2.4</b></p> <p>No tissue samples for wildlife species were collected in 2025 and no engagement or feedback has been provided to BW Gold regarding the quality of wildlife/game. The absence of this information does not allow BW Gold to determine any changes to the quality of hunted wildlife.</p> <p>While there have been some changes in the concentrations of plant and berry samples collected in previous years, these changes were not attributed to the Mine, and as such, it is determined that the Mine did not affect the quality of harvested plants or berries. No engagement or feedback has been provided to BW Gold regarding the quality of plants and berries.</p> <p>One Aboriginal Group Monitor reported that they noticed more algae forming in the water around the mine site and expressed concern about the impacts of a change in water quality on wildlife and fish. The algae was likely due to clearing that took place on site in 2025, which increased sunlight on waterbodies, resulting in algae growth. No additional feedback was received on changes to water quality in 2025.</p> <p>Average concentrations of aluminum and iron measured in surface water in 2025, exceeded Baseline and Predicted levels, although they remained below the Guideline NPMs and no risk to human health has been identified. The primary reasons for these higher concentrations likely include: the discharge of total suspended solids (TSS) from the Mine into Davidson Creek due to an Erosion and Sediment Control failure upstream; overland water flow from areas affected by wildfires into Davidson Creek; clearing by the Mine upstream of Davidson Creek; and impacts from a Mine dust plume incident on Creek 661. The average cobalt concentration over the year remained below the Guideline levels; however, maximum concentrations exceeded the guidelines in the second half of the year. This may be related to unrecovered seepage from the Interim Environmental Control Dam.</p> | <p><b>Appendix 8-2, Section 2.5</b></p> <p>Monitoring results of the CFMP in 2025 indicated that surface water COPC concentrations were higher than Baseline and Predicted levels identified by the Surface Water Quality Model. As a result of the changes to the surface water quality, a “medium” trigger is identified in the CFMP, and therefore, a “low” trigger is identified in the CFSEC FUP. No changes in quality are reported for any of the country foods categories (i.e. quality of plants, berries, or aquatic species). Further, metals concentrations remain below Guideline NPMs and do not pose a risk to human health. Additionally, the Mine has not received complaints or concerns from Indigenous groups regarding changes to the quality of country foods. Adaptive management has also been triggered under the CFMP and AEMP. Therefore, no additional adaptation measures are recommended under the CFSEC FUP.</p> |

| Monitoring           | Survey/Methodology   | Dates                            | Results Summary  | Adaptive Management/Recommendations           |
|----------------------|--|----------------------------------|--|---|
|                      |  |                                  | <p>There was no evidence from fish tissue sampling that the Mine's activities have altered the quality of fish. No engagement or feedback has been provided to BW Gold regarding the quality of fish.</p> <p>Aside from COPC levels in surface water analyzed in 2025, the monitoring results are aligned with the predicted effect from the environmental assessment.</p>   |   |
| <b>Food Security</b> | <b>Appendix 8-2, Section 2.4</b><br>Change in perception of food security due to change in access, availability and/or quality of country foods            | <b>Appendix 8-2, Section 2.4</b> | <b>Appendix 8-2, Section 2.4</b><br>There is no evidence that activities at the Mine have resulted in changes to perceptions of food security due to the change in access, availability, and/or quality of country foods. Further, the province's inflation rate remained stable at 2.1%, indicating only modest changes in the price of goods.<br><br>The monitoring results are aligned with the predicted effect from the environmental assessment. | <b>Appendix 8-2, Section 2.4</b><br><br>None. |
| <b>Health</b>        | <b>Appendix 8-2, Section 2.4</b><br>Changes in levels of physical activity associated with country foods harvesting  | <b>Appendix 8-2, Section 2.4</b> | <b>Appendix 8-2, Section 2.4</b><br>There is no evidence that Mine activities have been associated with changes in accessing local harvesting areas, and as such, changing the approach to harvesting or levels of physical activity associated with country foods harvesting.<br><br>The monitoring results are aligned with the predicted effect from the environmental assessment.  | <b>Appendix 8-2, Section 2.4</b><br><br>None. |
| <b>Culture</b>       | <b>Appendix 8-2, Section 2.4</b><br>Change in culture due to changes in country foods harvesting associated with Project activities, components or effects | <b>Appendix 8-2, Section 2.4</b> | <b>Appendix 8-2, Section 2.4</b><br>There is no evidence that Mine activities have caused changes in culture associated with country foods harvesting and the relationship of harvesting with knowledge sharing or language use.<br><br>The monitoring results are aligned with the predicted effect from the environmental assessment.  | <b>Appendix 8-2, Section 2.4</b><br><br>None. |

## 8 Air Quality (6.12)

The *Air Quality and Fugitive Dust Management Plan* (AQDMP, (Blackwater Gold Ltd, 2025) was developed to address several conditions relating to air quality and fugitive dust, including 6.12 of the DS. It was designed to identify the Mine's fugitive dust-emitting sources and mitigation and contingency measures if primary control measures are not effectively controlling dust emissions.

**6.12** The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the health of Indigenous Peoples as a result of changes to air quality and determine the effectiveness of mitigation measures. As part of the implementation of the follow-up program, the Proponent shall monitor nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), fine particulate matter (PM<sub>2.5</sub>), particulate matter (PM<sub>10</sub>), dust, and carbon monoxide (CO) in air. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.

The *Air Quality and Fugitive Dust Management Annual Report 2025* (Blackwater Gold Ltd., 2026c) (Appendix 9) presents the results of the 2025 monitoring program.

This section provides an overview of monitoring, results, and adaptive management that occurred during the reporting period to support compliance with DS 6.12. Full details can be reviewed in Appendix 9.

## 8.1 Monitoring and Analysis

As outlined above, details regarding the monitoring activities done in support of condition 6.12 are provided in Appendix 9. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 8-1 below summarizes the monitoring results and recommendations for work done, it also specifies where further information on each item can be found in the Appendix.

Table 8-1: Summary of DS condition 6.12 follow-up monitoring (Blackwater Gold Ltd., 2026c)

| Monitoring  | Survey/Methodology               | Dates                         | Results Summary   | Adaptive Management/Recommendations |
|---|----------------------------------|-------------------------------|---|-------------------------------------|
| <b>Particulate Matter Monitoring</b>                  | <b>Appendix 9, Section 2.4.2</b> | January – December 2025       | <p><b>Appendix 9, Section 2.4.3</b><br/>                     In 2025, the Partisol PM<sub>2.5</sub> exceeded the Permit and TRP medium trigger level four times and the Partisol PM<sub>10</sub> exceeded five times. The root cause of these exceedances is attributed to nearby wildfires.</p> <p>Water trucks were frequently requested based on visual observations.</p>  |                                     |
| <b>Nitrogen dioxide and Sulfur Dioxide Monitoring</b> | <b>Appendix 9, Section 2.5.1</b> | December 2024 – December 2025 | <p><b>Appendix 9, Section 2.5.1.1</b><br/>                     In total 51 samples were collected between December 31, 2024, and December 30, 2025, with the highest SO<sub>2</sub> concentration of 0.72 parts per billion (ppb) observed between September 9 – 16, 2025 and highest NO<sub>2</sub> concentration of 15 ppb observed between November 25 to December 2, 2025. The 7-day results do not directly compare to the 1-hour standards and objectives due to the difference in time measurement; however, the annual average standard and objectives can be used (12 ppb for NO<sub>2</sub> and 4 ppb for SO<sub>2</sub>). Results were well below the annual average standard and objective, as approximately half of the samples were below detection limit, resulting in an average NO<sub>2</sub> concentration of 1.59 ppb and SO<sub>2</sub> concentration of 0.23 ppb.</p> |                                     |
| <b>Carbon monoxide</b>                                | <b>Appendix 9, Section 2.5.2</b> | January – December 2025       | <p><b>Appendix 9, Section 2.5.2.1</b><br/>                     In total 27 samples were collected between December 31, 2024, and January 13, 2026, with the highest passive CO concentration being 1041 ug/m<sup>3</sup> observed between June 3 – 17. All remaining results except but for two observed between March 25 – Apr 8 (529 µg/m<sup>3</sup>) and August 26 – September 9, 2025 (687 µg/m<sup>3</sup>), were non-detect (&lt; 500 µg/m<sup>3</sup>).</p>   |                                     |

## 9 Effects on Moose (6.14)

The purpose of the *Wildlife Mitigation and Monitoring Plan* (WMMP) (ERM, 2023b) is to manage impacts on wildlife in the Blackwater Mine area during Construction, Operations, Closure, and Post-closure.

The *2025 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2026a), (Appendix 6) summarizes and presents the results of the follow up programs and monitoring of mitigation measures during 2025. This follow-up program includes monitoring for moose required by condition 6.14 of the DS in Section 3.1.

**6.14** The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse effects from the Designated Project on moose (*Alces alces*) and determine the effectiveness of mitigation measures. As part of the implementation of the follow-up program, the Proponent shall conduct winter distribution and density surveys for moose (*Alces alces*) starting prior to construction and until the end of operation. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.

### 9.1 Monitoring and Analysis

As outlined above, details regarding monitoring activities done in support of condition 6.14 are provided in Appendix 6. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 9-1 below summarizes the monitoring results and recommendations and identifies where further information on each item can be found in the Appendix.

Table 9-1: Summary of DS condition 6.14 follow-up monitoring (ERM, 2026a)

| Monitoring | Survey/Methodology   | Timing                          | Results  | Adaptive Management/Recommendations           |
|------------|--|---------------------------------|--|---|
| Moose      | <b>Appendix 6, Section 2.2</b><br>Habitat Loss                         | January 2025 –<br>December 2025 | <b>Appendix 6, Section 3.3</b><br>Between January and December 2025, the following moose habitat loss occurred:<br><ul style="list-style-type: none"> <li>- Growing: <ul style="list-style-type: none"> <li>o 37 ha</li> </ul> </li> <li>- Winter: <ul style="list-style-type: none"> <li>o 70 ha (ERM, 2026a)</li> </ul> </li> </ul>  | <b>Appendix 6, Section 4</b><br><br>None.     |
|            | <b>Appendix 6, Section 2.3.3</b><br>Moose-vehicle collision monitoring | January 2025 –<br>December 2025 | <b>Appendix 6, Section 2.3.4.3</b><br>No vehicle related wildlife incidents involving moose occurred in 2025. Mitigations in place to reduce the risk of vehicle-wildlife collisions include speed limits, signage at potential crossings, reporting of incidental sightings, and notices including information regarding protocols outlined in the WMMP such as Wildlife Right-of-Way, Wildlife Signage, and Seasonal Awareness as well as other Safe Driving Practices. (ERM, 2026a)   | <b>Appendix 6, Section 2.3.5</b><br><br>None. |
|            | <b>Appendix 6, Section 3.1.2.1</b><br>Ungulate pellet counts           | June 20-28, 2025                | <b>Appendix 6, Section 3.1.3.1</b><br>In total, 25 ungulate pellet count transects were surveyed at varying distances from the proposed Mine footprint in 2025. A total of 22 transects were located in the potential impact zone (eight within 500 m, five within 500 m - 1 km, four within 1 - 3 km, and five within 3 - 5 km of the Project footprint) and three transects in the control zone (5 – 10 km). Ten sample points were completed along each transect, with a total of 250 sample points completed.<br><br>Moose pellets were recorded at 60% (n = 15) of transects, accounting for 55% of the transects in the potential impact zone (n = 12) and 100% of transects in the control zone (n = 3). Deer pellets were only detected at 24% (n = 6) of transects, accounting for 18% of transects in the potential impact zone (n = 4) and in 66% of transects in the control zone (n = 2). No caribou pellet groups were observed.<br><br>Across all sites, the overall estimated number of pellet groups per ha was 0.12. Although the control had an estimated 5.27 pellet groups per ha, one site located along the Access Road accounted for 58% (n = 135) of all pellet groups recorded in 2025, and 94% of pellet groups within the control zone. As a result, the higher pellet groups per ha estimate for the control likely doesn't indicate a change in moose presence related to the Mine. (ERM, 2026a) | <b>Appendix 6, Section 4</b><br><br>None.     |
|            | <b>Appendix 6, Section 3.1.2.2</b> Snow Track Surveys (Ground surveys) | March 5, 2025                   | <b>Appendix 6, Section 3.1.3.2</b><br>A total of 30 aerial snow track transects totaling 555 km of survey effort were completed in 2025. In total, 285 moose tracks and four moose beds were recorded.<br><br>Moose tracks were recorded along all but one transect. Generally, tracks were distributed evenly across the study area. (ERM, 2026b)   | <b>Appendix 6, Section 4</b><br><br>None.     |

## 10 Effects on Caribou (8.18.6)

The *Caribou Mitigation and Monitoring Plan* (CMMP) (ERM, 2022a) is intended to describe the mitigation and monitoring measures that will be implemented to avoid, reduce and offset the Mines adverse effects on caribou and their critical habitat as defined in the recover Strategy for the Woodland Caribou, Southern Mountain Population (*Rangifer tarandus caribou*) (Environment Canada 2014, or as updated from time to time). The caribou monitoring programs include adaptive management and details of the follow-up programs to address regulatory requirements, including DS condition 8.18.6:

**8.18.6** For any offsetting required pursuant to condition 8.17, the Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and to the satisfaction of Environment and Climate Change Canada, a compensation plan for southern mountain caribou (*Rangifer tarandus caribou*). When developing the compensation plan, the Proponent shall take into account habitat needs for migratory birds and listed species at risk. The Proponent shall implement the compensation plan from the beginning of construction. The compensation plan shall include... a description of the follow-up program the Proponent shall implement to determine the effectiveness of the mitigation measures included in the compensation plan. As part of the development of the follow-up program, the Proponent shall determine, in consultation with Indigenous groups, the methods, timing and frequency for conducting winter surveys for caribou abundance and distribution within the Designated Project area. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program.

Section 6.2.2.2 of the CMMP specifically describes the methods, timing, and frequency for conducting winter surveys for caribou abundance and distribution in the Designated Project area.

The *2025 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2026a), (Appendix 6) summarizes and presents the results of the follow up programs and monitoring of mitigation measures during 2025. This follow-up program includes monitoring for caribou required by condition 8.18.6 of the DS in Section 3.2.

### 10.1 Monitoring and Analysis

As outlined above, details regarding the 2025 monitoring activities done in support of condition 8.16.8 are provided in Appendix 6. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 10-1 below summarizes the monitoring results and recommendations and identifies where further information on each item can be found in the Appendix.

Table 10-1: Summary of DS condition 8.18.6 follow-up monitoring (ERM, 2026a)

| Monitoring | Survey/Methodology   | Timing  | Results   | Adaptive Management/Recommendations    |
|------------|--|---|---|--|
| Caribou    | Appendix 6, Section 2.2<br>Habitat Loss                        | January – December 2025                       | <b>Appendix 6 Section 2.2.3</b><br>Between January and December 2025, the following caribou habitat loss occurred:<br><ul style="list-style-type: none"> <li>- Spring: <ul style="list-style-type: none"> <li>o 165 ha</li> </ul> </li> <li>- Summer/Fall: <ul style="list-style-type: none"> <li>o 156 ha</li> </ul> </li> <li>- Winter: <ul style="list-style-type: none"> <li>o 183 ha (ERM, 2026a)</li> </ul> </li> </ul>   | Appendix 6, Section 4<br><br>None.     |
|            | Appendix 6-1, Section 3.1.2.1<br>Ungulate pellet count surveys | June 20 – 28, 2025                            | <b>Appendix 6, Section 3.1.3.1</b><br>In total, 25 ungulate pellet count transects were surveyed at varying distances from the proposed Mine footprint in 2025. A total of 22 transects were located in the potential impact zone (eight within 500 m, five within 500 m - 1 km, four within 1 - 3 km, and five within 3 - 5 km of the Project footprint) and three transects in the control zone (5 – 10 km). Ten sample points were completed along each transect, with a total of 250 sample points completed.<br><br>No caribou pellets were observed. (ERM, 2026a)   | Appendix 6, Section 4<br><br>None.     |
|            | Appendix 6, Section 3.1.2.2 Snow Track Surveys (Ariel surveys) | March 5, 2025                                 | <b>Appendix 6, Section 3.1.3.2</b><br>A total of 30 aerial snow track transects totaling 555 km of survey effort were completed in 2025.<br><br>No caribou tracks were observed. (ERM, 2026a)   | Appendix 6, Section 4<br><br>None.     |
|            | Appendix 6, Section 3.2.2<br>Caribou offset monitoring program | N/A<br><br>January 8, 2025 - January 16, 2026 | <b>Appendix 6, Section 3.2.2</b><br>The caribou offset monitoring program consists of four separate monitoring programs: road restoration monitoring, access monitoring, sight lines monitoring, and wildlife use monitoring. The caribou offset monitoring program had not yet begun in 2025.<br><br>Baseline camera monitoring in two proposed caribou offset areas (Johnny Lake and Capoose) to provide baseline data on wildlife use. Monitoring sites were chosen based on sign and habitat for focal mammals (caribou, moose, bear, and wolf) and do not align with the final monitoring locations required for the caribou habitat wildlife use monitoring program. Camera data was collected from 14 of the 15 camera locations (Capoose = 9; Johnny Lake = 5) in 2025. No caribou were detected on these cameras in 2025.<br>This data is part of the baseline monitoring program that will inform the final program. (ERM, 2026a) | Appendix 6, Section 4<br><br>None.     |
|            | Appendix 6, Section 2.3.3.1<br>Incidental Observations         | January – December 2025                       | <b>Appendix 6, Section 3.2.3.2</b><br>No incidental observations or signs of caribou were recorded in 2025 by BW Gold personnel or WMMP monitoring programs. (ERM, 2026a)   | Appendix 6, Section 2.3.5<br><br>None. |

## 11 Whitebark Pine (8.20.5)

The *Whitebark Pine Management Plan* (WPMP) (ERM, 2022b) was developed to address a number of conditions, including 8.20 and 8.20.5 of the DS. It was designed to mitigate the effects from the Mine on whitebark pine (*Pinus albicaulis*); however, given that whitebark pine operates as a keystone and foundation species crucial to ecosystem function and that it faces existential threats, goals and objectives beyond the scope of direct impact mitigation were required.

The overall goals of the WPMP are to:

- Mitigate impacts to whitebark pine caused by mine development;
- Mitigate potential impacts to regional Clark's nutcracker populations;
- Contribute to the knowledge base of deploying whitebark pine in mine reclamation;
- Contribute to the overall recovery of whitebark pine; and
- Understand baseline conditions and inform mitigation strategies implemented for whitebark pine and Clark's nutcracker.

Although reclamation has not begun at site (Section 1.1), the *BW Gold Whitebark Pine 2025 Update* (Moody Trees, 2026) (Appendix 10) summarizes implementation of the WPMP, while the *2025 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2026a) (Appendix 6) presents results relating to monitoring the baseline presence of the Clark's nutcracker. The results of these programs will be used to inform the analysis of future monitoring during reclamation activities.

Table 11-1 summarizes this condition of the DS and where the full details can be found in the associated appendix of this document.

Table 11-1: DS condition 8.20.5 follow-up monitoring

| Condition No. | Condition  | Appendix   | Section  |
|---------------|--|--|--|
| 8.20.5        | <p>The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, a whitebark pine management plan to mitigate effects from the Designated Project on whitebark pine (<i>Pinus albicaulis</i>) and its critical habitat. The Proponent shall implement the plan during all phases of the Designated Project consistent with any applicable recovery strategy related to whitebark pine (<i>Pinus albicaulis</i>). As part of the whitebark pine management plan, the Proponent shall... develop and implement a follow-up program in consultation with Indigenous groups to determine the effectiveness of the mitigation measures included in the whitebark pine management plan. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program. The follow-up program shall include:</p> | <p>Described in the WPMP (ERM, 2022b)</p>  |  |
| 8.20.5.1      | <p>Visual monitoring of populations of whitebark pine (<i>Pinus albicaulis</i>), including their health, within reclaimed areas at a minimum every five years; and</p>   | <p>Described in the BW Gold Whitebark Pine Field Update – 2022 (Blackwater Gold Ltd, 2023)</p> |  |
| 8.20.5.2      | <p>Monitoring of use of the reclaimed areas by Clark's nutcracker (<i>Nucifraga columbiana</i>) for the purpose of whitebark pine regeneration. Should the results of monitoring demonstrate that use of the reclaimed areas by Clark's nutcracker (<i>Nucifraga columbiana</i>) is not adequate, the Proponent shall implement additional mitigation measures.</p>  | <p>Appendix 6: 2025 Wildlife Mitigation and Monitoring Program Compliance Report</p>           | <p>Section 3.9.3.4 Clark's Nutcracker Monitoring</p> |

## 11.1 Monitoring and Analysis

As outlined above in Table 11-1, details regarding the monitoring activities done in support of condition 8.20.5 are provided in Appendix 10. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 11-2 below summarizes the monitoring results and recommendations and identifies where further information on each item can be found in the Appendices. For context, Table 11-1 summarizes all monitoring done through the WPMP in 2025, which addresses requirements outside of DS condition 8.20.5.

Table 11-2: Summary of DS condition 8.20.5 follow-up monitoring (Moody Trees, 2026)

| Monitoring     | Survey/Methodology   | Timing   | Results  | Adaptive Management/Recommendations  |
|----------------|--|--|--|--|
| Whitebark Pine | <p><b>Appendix 10<br/>BW Gold Whitebark Pine 2025 Update (Moody Trees, 2026)</b></p>     | <p>2022 (every five years)</p>                   | <p>N/A – Health of mature whitebark pine, planting trials on mineral exploration roads and drill pads, parent tree trials, and translocation survival were all monitored in 2022 (Moody Trees, 2026)</p>   | <p><b>Appendix 10, Recommendations</b><br/>Continue to identify areas for future treatments and monitoring be conducted, to identify any success or failure signals, and adaptive management strategies be developed accordingly as per the WPMP (ERM, 2022b).</p> <p>Monitoring should initially be conducted every year until seedling have established and then at longer intervals as per the management plan.</p> |
|                | <p><b>Appendix 6, Section 3.9.2.4</b><br/>Clark’s nutcracker monitoring (ERM, 2026a)</p> | <p>June 17 – 21, 2025<br/>July 20 – 21, 2025</p> | <p><b>Appendix 6, Section 3.9.3.4</b><br/>Clark’s nutcracker call playbacks were completed along 10 transects from June 17 to 21 and July 20 and 21, 2025, with five transects in both the potential impact and control areas. Surveys detected a total of 13 Clark’s nutcracker, with Clark’s nutcracker detected along four transects in Mount Davidson potential impact zone (n = 12), and one transect in the control zone (n = 1). (ERM, 2026a)</p> |  |

## 12 Effects on Western Toad (8.21)

The purpose of the *Wildlife Mitigation and Monitoring Plan* (WMMP) (ERM, 2023b) is to manage impacts on wildlife in the Blackwater Mine area during Construction, Operations, Closure, and Post-closure.

The *2025 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2026a) (Appendix 6) summarizes and presents the results of the follow up programs and monitoring of mitigation measures during 2025. This follow-up program includes monitoring for western toad required by condition 8.21 of the DS in Section 3.9.

Table 12-1 summarizes this condition of the DS and where the full details can be found in the associated appendix of this document.

Table 12-1: DS condition 8.21 follow-up monitoring

| Condition No. | Condition  | Appendix  | Section                                     |
|---------------|--|---|---|
| 8.21.         | The Proponent shall develop, in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to the effects of changes caused by the Designated Project on western toad ( <i>Anaxyrus boreas</i> ). The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall: | Described in the WMMP (ERM, 2023b)  |   |
| 8.21.1        | Conduct western toad surveys annually in breeding habitat identified pursuant to condition 8.10 from the start of construction until the end of decommissioning;   | Appendix 6: 2025 Wildlife Mitigation and Monitoring Program Compliance Report | 3.10.2.2 Monitoring toad breeding ponds     |
| 8.21.2        | Monitor western toad ( <i>Anaxyrus boreas</i> ) in relocation areas for western toad ( <i>Anaxyrus boreas</i> ) salvage conducted pursuant to condition 8.11; and  | Appendix 6: 2025 Wildlife Mitigation and Monitoring Program Compliance Report | 3.10.2.2 Monitoring toad breeding ponds     |
| 8.21.3        | Monitor western toad ( <i>Anaxyrus boreas</i> ) mortality on project roads from the start of construction until the end of decommissioning.  | Appendix 6: 2025 Wildlife Mitigation and Monitoring Program Compliance Report | 3.10.2.1 Monitoring toad mortality on roads |

## 12.1 Monitoring and Analysis

As outlined in Table 12-1 above, detailed regarding the monitoring activities done in support of condition 8.21 are provided in Appendix 6. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 12-2 below summarizes the monitoring results and recommendations for work done, it also specifies where further information on each item can be found in the Appendix.

Table 12-2: Summary of DS condition 8.21 follow-up monitoring (ERM, 2026a)

| Monitoring   | Survey/Methodology  | Timing                  | Results  | Adaptive Management/Recommendations |
|--------------|---|-------------------------|--|-------------------------------------|
| Western Toad | Appendix 6, Section 3.10.2.1<br>Monitoring for Toad Mortalities on Road | May 26 – May 30, 2025   | <p><b>Appendix 6, Section 3.10.3.1</b><br/>Monitoring of toad mortality on roads were completed along 10 road transects in 2025 in the spring.</p> <p>No amphibian mortalities or presence was recorded in 2025. (ERM, 2026a)</p>  | Appendix 6, Section 4<br>None.      |
|              | Appendix 6, Section 3.10.2.2<br>Monitoring Toad Breeding Ponds          | July 12 – July 17, 2025 | <p><b>Appendix 6, Section 3.10.3.2</b><br/>Amphibian breeding pond surveys were completed for 30 sites at varying distances from the Mine footprint in 2025. In total, 10 sites were located in the control zone (500m – 10km) while 20 sites were in the potential impact zone: eight sites within the Mine footprint and 12 within 500 m of the Mine footprint. Of the 30 sites surveyed, 21 were classified as natural sites and nine were classified as man-made/disturbed sites (e.g., showed evidence of the site being impacted by Mine activities).</p> <p>Four amphibian species were observed during breeding pond surveys: western toad, wood frog, Columbia spotted frog, and long-toed salamander. A total of 76,783 individual amphibians of various life stages or egg masses were recorded across the four species in 2025, 98% of which were western toad (n = 75,415). The remaining observations were Columbia spotted frog (n = 751), long-toed salamander (n = 516), and wood frog (n = 101).</p> <p>Western toad was the only amphibian species of conservation concern identified in 2025. Western toad presence at any life stage was recorded at 14 sites, with breeding confirmed at 10 sites. Western toad presence and breeding was more frequently recorded at control sites (Presence = 60%, Breeding = 50%) than potential impact sites (Presence = 40%, Breeding = 25%). Western toad presence and breeding was more frequently associated manmade/disturbed sites (Presence = 55%; Breeding = 44%) than natural sites (Presence = 43%; Breeding = 29%).</p> <p>Other amphibian species presence at any life stage was recorded at 17 sites, with breeding confirmed at 9 sites. Other amphibian species breeding activity was higher in the control zone (50% of sites), than the potential impact zone (20%). (ERM, 2026a)</p> | Appendix 6, Section 4<br>None.      |
|              | Appendix 6, Section 3.10.3.3<br>Incidental Observations                 | January – December 2025 | <p><b>Appendix 6, Section 3.10.3.3</b><br/>A total of 10 incidental amphibian observations were recorded in 2025. Observations made by WMMP monitoring programs accounted for six observation events, totalling and estimated 10 individuals. Observations of amphibians recorded during regular inspections of site or by BW Gold personnel in the Blackwater Wildlife Sighting accounted for three western toad breeding sites, two western toad juvenile, and two western toad egg masses. As no construction works were planned for these areas, no salvage or additional measures were required. Exclusionary fencing was established for the three breeding ponds and remained in place until amphibians were no longer present and/or the pond dried up. (ERM, 2026a)</p>   | Appendix 6, Section 4<br>None.      |

## 13 Effects on Bats (8.22)

The purpose of the *Wildlife Mitigation and Monitoring Plan* (WMMP) (ERM, 2023b) is to manage impacts on wildlife in the Blackwater Mine area during Construction, Operations, Closure, and Post-closure.

The *2025 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2026a) (Appendix 6) summarizes and presents the results of the follow up programs and monitoring of mitigation measures during 2025. This follow-up program includes monitoring for bats required by condition 8.22 of the DS in Section 3.5.

**8.22** The Proponent shall develop, in consultation with Indigenous groups, and implement a follow-up program to monitor little brown myotis (*Myotis lucifugus*) and northern myotis (*Myotis septentrionalis*) usage of buffer zones established pursuant to condition 8.14 and roosting structures installed and maintained by the proponent pursuant to condition 8.15 to determine the effectiveness of the mitigation measures. The Proponent shall implement the follow-up program during construction and operation and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.

### 13.1 Monitoring and Analysis

As outlined above, details regarding the monitoring activities done in support of condition 8.22 are provided in Appendix 6. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 13-1 below summarizes the monitoring results and recommendations and identifies where further information on each item can be found in the associated appendix.

Table 13-1: Summary of DS condition 8.22 follow-up monitoring (ERM, 2026a)

| Monitoring | Survey/Methodology   | Timing                           | Results  | Adaptive Management/Recommendations   |
|------------|--|----------------------------------|--|---------------------------------------|
| Bats       | Appendix 6, Appendix B<br>Pre-clearing surveys             | January – December 2025          | <b>Appendix 6, Section 2.1.3, Appendix C</b><br>Pre-clearing surveys for bat roosts and hibernacula were completed between February 27 to December 20, 2025. None were identified.   | <b>Appendix 6, Section 4</b><br>None. |
|            | Appendix 6, Section 3.6.2.1<br>Bat Distribution Monitoring | July 17 – 25 and August 19, 2025 | <b>Appendix 6, Section 3.6.3.1</b><br>A total of 19 Autonomous Recording Units (ARUs) were deployed in the summer bat season in suitable foraging habitat within 200 m of the Mine footprint (n = 9) and within 200 m - 2 km of the Mine footprint (n = 10). Due to the limited accessibility, two control ARU locations are outside of the 2 km distance range.<br><br>Bats were detected at all 19 ARU deployment locations, with a total of 13,881 detections in the potential impact zone, and 3,996 detections in the control zone.<br><br>After analysis of ARU files using the Kaleidoscope Pro auto-ID function and manual vetting, six bat species were detected with confidence (i.e., had many clear diagnostic calls recorded) in the 2025 monitoring area: big brown bat, eastern red bat, hoary bat, little brown myotis, silver-haired bat, and long-eared myotis. Of these species, four are of conservation concern (little brown myotis, eastern red bat, hoary bat, silver-haired bat. (ERM, 2026a)   | <b>Appendix 6, Section 4</b><br>None. |
|            | Appendix 6, Section 3.6.2.3<br>Bat Roosting Structures     | January – December 2025          | <b>Appendix 6, Section 3.6.3.2</b><br>A total of 29 BrandenBark bat roosting structures are installed in the Matthews Creek Wetland offset area (n = 3), Wetland 9 (n = 12), Wetland 15 (n = 8), and Lake 15/16 (n = 6).<br><br>HOBO Roost Loggers were installed inside 10 BradenBark structures at Lake 15/16 (n = 3), Wetland 9 (n = 3), and Wetland 15 (n = 3) and in the three different habitat types: open (n = 3), mixed (n = 4), and closed (n = 3). Four HOBO loggers were installed in each structure, with two at the top and two at the bottom, facing opposite directions (north and south) for a total of 39 loggers (one location only has three loggers). Data was collected for 27 of the 39 HOBO loggers deployed in BrandenBark structures during servicing in May, July, August, and November 2025.<br><br>Between May 15 to September 30, 2025, the daily mean temperature and humidity were modelled to assess the effects of canopy cover, aspect, and position recorded by HOBO loggers. No significant difference was observed in daily temperature or humidity between position canopy cover and aspect. However, a significant difference in average daily temperature (p<0.001) was recorded for position between top and bottom loggers, indicating that there was a notable temperature gradient between the BrandenBark bat roosting structures.<br><br>Two ARUs (one at the base of the tree and one 10-12 m from the forest edge) were deployed at three BrandenBark bat roosting structures within the Lake 15/16 area for a total of six ARUs. Each roosting structure represented | <b>Appendix 6, Section 4</b><br>None. |

|  |   |                         |  |                                       |
|--|---|-------------------------|--|---------------------------------------|
|  |   |                         | <p>a different canopy cover treatment type (open, mixed, and closed).</p> <p>After analysis of ARU files using the Kaleidoscope Pro AutoID function and manual vetting, five species were detected confidence in the 2025 monitoring area: little brown myotis, long-eared myotis, silver-haired bat, eastern red bat, and hoary bat. All species detected, aside from long-eared myotis, are species of conservation concern.</p> <p>Bats were detected at all three deployment areas and at all ARUs. The greatest number of detections were associated with the open canopy treatment type (7,036 bat passes), followed by the closed (6,446 bat passes) and the mixed (3820 bat passes) canopy treatment types. (ERM, 2026a)</p> |                                       |
|  | <b>Appendix 6, Section 3.6.2.4</b><br>NABAT Monitoring        | July 15 – July 31, 2025 | <p><b>Appendix 6, Section 3.6.2.4, Appendix N</b></p> <p>In 2025, a total of 18 ARUs were deployed evenly between three 10 km by 10 km NABAT grid cells. Eastern red bats, silver-haired bat, and little brown myotis were detected at all surveyed locations. Long-eared myotis was detected at all sites except one. (ERM, 2026a)</p>  | <b>Appendix 6, Section 4</b><br>None. |
|  | <b>Appendix 6, Section 3.6.3.3</b><br>Incidental Observations | January – December 2025 | <p><b>Appendix 6, Section 3.6.3.3</b></p> <p>No incidental observations or signs of bats were recorded in 2025 by BW Gold personnel or WMMP monitoring programs. (ERM, 2026a)</p>  | <b>Appendix 6, Section 4</b><br>None. |

## 14 Appendix List

- Appendix 1 Summary of DS Condition Activities
- Appendix 2 2025 BW Gold Consultation Report
- Appendix 3 3.14 Results Report
- Appendix 4 3.15 Results Report
- Appendix 5 3.16 Results Report
- Appendix 6 2025 Wildlife Mitigation and Monitoring Program Compliance Report
- Appendix 7 2025 Wetland Management and Offsetting Plan Annual Report
- Appendix 8-1 2025 Country Foods Monitoring Plan Annual Report
- Appendix 8-2 Annual Monitoring Report Country Foods Socio-economic Condition Follow-up Program
- Appendix 9 2025 Air Quality and Fugitive Dust Management Annual Report
- Appendix 10 BW Gold Whitebark Pine 2025 Annual Report

## 15 References

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