



# Blackwater Mine



## 2024 EAC M19-01 Annual Compliance Report

March 2025



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# Acronyms and Abbreviations

Aboriginal Groups	Lhoosk’uz Dené Nation, Ulkatcho First Nation, Nadleh Whut’en First Nation, Saik’uz First Nation, Stellat’en First Nation, and Nazko First Nation (as defined in the Project’s Environmental Assessment Certificate #M19-01)
AEMP	Aquatic Effects Monitoring Plan
AGEP	Aboriginal Group Engagement Plan
AGM	Aboriginal Group Monitor
AGMMP	Aboriginal Group Monitor and Mitigation Plan
AMCMP	Accidents and Malfunctions Administration & Communication Plan
AQFDMP	Air Quality Fugitive Dust Management Plan
ARD	Acid Rock Drainage
Artemis	Artemis Gold Inc.
BC	British Columbia
Blackwater or The Project	Blackwater Project or Blackwater Gold Project
BW Gold	BW Gold Ltd.
CEMP	Construction Environmental Management Plan
CEMMP	Community Effects Monitoring and Management Plan
CFMP	Country Food Management Plan
CHR	Cultural Heritage Resources
CLC	Community Liaison Committee
CMMP	Caribou Monitoring and Mitigation Plan
CMP	Cyanide Management Plan
CMT	Culturally Modified Trees
CO	Carbon Monoxide
COPC	Contaminants of Potential Concern
CPD	Certified Project Description
CPESC	Certified Professional in Erosion and Sediment Control
CSFN	Carrier Sekani First Nations
CSRMP	Cultural and Spiritual Resources Management Plan
DFO	Department of Fisheries and Oceans Canada
EA	Environmental Assessment

EAA	Environmental Assessment Act
EAC	Environmental Assessment Certificate #M19-01
EAO	Environmental Assessment Office
EVCC	Environment Climate Change Canada
ELoMC	Environmental Life of Mine Committee
ELUP	End Land Use Plan
ELU	End Land Use
EMC	Environmental Monitoring Committee
EM	Environmental Manager
EMB	Environmental Monitoring Board
EMLI	Ministry of Energy, Mines and Low Carbon Innovation
EMPR	Ministry of Energy, Mines and Petroleum Resources
ENV	Ministry of Environment and Climate Change Strategy
ESA	Environmentally Sensitive Areas
ESC	Erosion and Sediment Control
FLNRORD or FLNR	Ministry of Forest, Lands and Natural Resource Operations and Rural Development
FMEA	Failure Modes Effects Assessment
FOR	Ministry of Forest
FP	Future Plan
FSR	Forest Service Road
FTLRP	Final Transmission Line Routing Plan
GTC	Guide Territory Certificate
HMSP	Health and Medical Services Plan
IC	In Compliance
IEM	Independent Environmental Monitor
IEM TOE	Independent Environmental Monitor Terms of Engagement
LDN	Lhoosk'uz Dené Nation
LGO	Low Grade Ore
M-246	Mines Act Permit M-246
MA/EMA	Major Works/Environmental Management Act Application
MEM	Ministry of Energy and Mines

MERP	Mine Emergency Response Plan
ML	Metal Leaching
ML/ARD	Metal Leaching and Acid Rock Drainage
MOE	Ministry of Environment
MOU	Memorandum of Understanding
NAPS	National Air Pollution Surveillance
New Gold	New Gold Inc.
NFN	Nazko First Nation
NFNs	Nechako First Nations
NHA	Northern Health Authority
NVMP	Noise and Vibration Management Plan
NWFN	Nadleh Whut'en First Nation
PAG	Potentially Acid Generating
Permits 110650 and 110652	PE-11650 and PE-11652
QP	Qualified Professional
ROW	Right of Way
SBEB	Science Based Environmental Benchmarks
SFN	Saik'uz First Nation
SRWMA	Stellako River Wildlife Management Area
StFN	Stellat'en First Nation
TDSTP	Tailings Dam Safety Transparency Plan
THCMP	Tenure Holder Communication and Mitigation Plan
TK	Traditional Knowledge
TL	Transmission Line
TOE	Terms of Engagement
TOR	Terms of Reference
TRP	Trigger Response Plan
TSF	Tailings Storage Facility
UFN	Ulkatcho First Nation
UTM	Universal Transverse Mercator
WLRS	Ministry of Water, Land and Resource Stewardship

WMMP	Wildlife Monitoring and Mitigation Plan
WMOP	Wetland Management Offsetting Plan
WMS	Water Management Structure
WSP	Winter Stabilization Plan
YDWL	Yinka Dene Water Law

## 1.0 Overview

New Gold Inc. (New Gold) received Environmental Assessment Certificate (EAC) #M19-01 on June 21, 2019 under the 2002 Environmental Assessment Act (BC EAO 2019c). In August 2020, Artemis Gold Inc. (Artemis) acquired the mineral tenures, assets and rights in the Blackwater Project 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.

EAC #M19-01 includes two schedules. Schedule A comprises the Certified Project Description (CPD), which describes the Project activities and components, and Schedule B comprises the Table of Conditions which includes 43 conditions. This document presents details regarding the compliance status with EAC Schedule B through 2024 per condition 5.

Condition 5(b) requires the submission of this summary every year of Construction by March 31, while condition 5(c) requires the submission of this summary at least 30 days prior to the start of Operations (as defined by the Certificate). Due to the proximity of the start of the Operations phase (anticipated in Q2 2025) to March 31, 2025, this submission is intended to satisfy both conditions. As reflected in Table 2-1, some reports summarizing monitoring and activities are in development and will be provided by March 31, 2025.

### 1.1 2024 Substantial Start Determination

The EAC specifies the duration of the Certificate is 5 years from the issuance of the EAC on June 21, 2019, thus expiring on June 21, 2024. Section 18 (1) of the Environmental Assessment Act states:

*An environmental assessment certificate must specify a deadline, at least 3 years and not more than 5 years after the issue date of the certificate, by which time the holder of the certificate, in the reasonable opinion of the minister, must have substantially started the project.*

On January 19, 2024, BW Gold submitted details regarding the development of key elements identified in the CPD requesting an Environmental Assessment Office (EAO) determination regarding the substantial start of the Mine. On May 21, 2024 the EAO provided BW Gold with a formal notification that the Project had been assessed and found to have been substantially started as per Section 31 of the Environmental Assessment Act. This determination means that the Certificate remains in effect for the life of the Project, subject to the Minister's power to cancel and suspend a certificate under Section 56 of the Act.

### 1.2 2024 Inspections Summary

In 2024, EAO CEB inspections occurred February 12, March 19, and May 14. Records of these inspections were provided; in summary the following conditions were reviewed for compliance:

- Condition 12 Independent Environmental Monitor (IEM)
- Condition 13 Construction Environmental Management Plan (CEMP)
- Condition 15 Indigenous Cultural Awareness and Recognition
- Condition 18 Cultural and Spiritual Resources Management Plan (CSRMP)
- Condition 39 Final Transmission Line Routing Plan
- Condition 42 Public Communications

Findings associated with conditions 12, 13, and 42 were recorded. Conditions 13 and 42 were promptly addressed through administrative adjustments to the IEM Terms of Engagement, and the public website. Those observations related to condition 13 were associated with waste management, tank collision protection, and hydrocarbon management, responses included:

- Appropriate segregation of food waste, verified through weekly BW Gold inspections;
- Training in re-fueling was developed, and provided to all crews; and,

- Establishing collision protection for propane tanks where needed.

During these inspections, it was also noted that the camp at the Chu site, was not included in the CPD. The area where the Chu camp operated was on tenured land owned by the Ministry of Energy, Mines and Low Carbon Initiatives (EMLI) and Artemis Gold was granted written permission to temporarily utilize this area. The Chu camp was not developed and operated by BW Gold, and its use was temporary to support the construction of the Transmission Line. EAO notified BW Gold that use of this facility was not in accordance with Section 6(2) of the Environmental Assessment Act (EAA). In response to this observation the camp was vacated by August 21<sup>st</sup> and ceased operation on August 26<sup>th</sup>.

In addition to oversight provided by the EAO, 11 inspections from the Independent Environmental Monitor (IEM) also occurred. These occurred approximately monthly, and in accordance with condition 12.

## 2.0 Environmental Assessment Certificate Compliance Status

Table 2-1 summarizes the status of the conditions found within the Schedule B of the EAC. Compliance status definitions and self-report requirements outlined in the *EAO Guide to Compliance Self Reports – December 2019*, were used in developing this self-report.

In summary Blackwater Gold Mine's (BWG, the Mine) 2024 certificate conditions status of compliance is:

- 42 of 43 (98%) of Schedule B Conditions show Condition Status as "In Compliance" (IC)
- 1 of 43 (2%) of Schedule B Conditions show Condition Status as "Future Plan" (FP)
- 0 of 43 (0%) of Schedule B Conditions show Condition Status as "Out of Compliance"

Conditions 1 through 4 of EAC schedule B apply to several other conditions, compliance with these is reflected in each applicable condition status. This is largely demonstrated through confirmation of EAO approval for each plan for implementation, as each plan is reviewed for compliance by EAO relative to those conditions. Where documents have been updated BW Gold provides updates to those groups identified in the applicable condition (condition 4).

To support ongoing compliance with condition 3, summaries of applicable adaptive management are reflected in applicable appendices.

Note that the names of government offices reflect current names in the content for "Activity to Fulfill Condition Requirements" only. Ministry of Energy and Mines (MEM) is Ministry of Energy, Mines and Low Carbon Initiative (EMLI). Ministry of Environment (MOE) is Ministry of Environment and Climate Change Strategy (ENV). Ministry of Forest, Lands and Natural Resource Operations and Rural Development (FLNR or FLNRORD) are split into Ministry of Forest (FOR) and Ministry of Water, Land and Resource Stewardship (WLRS). Certificate conditions have not been updated with current names to stay consistent with EAC wording.



Table 2-1 EAC #M19-01 Compliance Status

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
EAC Condition 5 <b>Compliance Verification and Reporting</b>	<p>The Holder must provide to the EAO and to the Aboriginal Groups any document, data or information requested by the EAO for the purposes of compliance inspection and verification. The Holder must provide any document, data or information requested within the timeframe and in the manner specified by the EAO. The Holder must submit a report to the attention of the EAO and Aboriginal Groups on the status of compliance with this Certificate at the following times:</p> <ol style="list-style-type: none"> <li>at least 30 days prior to the start of Construction;</li> <li>on or before March 31 in each year after the start of Construction;</li> <li>at least 30 days prior to the start of Operations;</li> <li>on or before March 31 in each year after the start of Operations;</li> <li>at least 30 days prior to the start of Closure;</li> <li>on or before March 31 in each year after the start of Closure until the end of Closure;</li> <li>at least 30 days prior to the start of Post-Closure; and</li> <li>on or before March 31 in each year after the start of Post-Closure until the end of Post-Closure.</li> </ol> <p>The reports must be in a form satisfactory to the EAO. The EAO may adjust or extend this reporting requirement by providing written notice to the Holder.</p>	<ol style="list-style-type: none"> <li>January 2022 Compliance Report was provided 30 days prior to start of construction.</li> <li>On March 31, 2024 a construction phase C5 report was submitted to EAO and Indigenous Nations. This submission is intended to satisfy this condition, note that it has been provided early to comply with condition (c) and that appendices will follow by March 31, 2025.</li> <li>Submission of this report is intended to satisfy condition (c), appendices will follow by March 31, 2025.</li> <li>An operations phase self-compliance report will be submitted by March 31, 2026.</li> </ol> <p>Those remaining conditions are related to future phases and are not currently applicable.</p>	Ongoing	IC	N/A
EAC Condition 6 <b>Project Status Notification</b>	<p>The Holder must notify the EAO and Aboriginal Groups, in writing, at a minimum three months prior to, and no more than six months in advance of commencing, Construction, Operations, Closure, and Post-Closure.</p> <p>Should the primary contact for the Project change, the Holder must notify the EAO and Aboriginal Groups, in writing, within 30 days of such change and provide the physical address, email address and phone number(s) of the new primary contact.</p>	<p>A notification on project status - construction was circulated to the EAO and Aboriginal groups in writing on December 2, 2021. An additional notification on project status was circulated to EAO and Aboriginal Groups in writing on August 6, 2022.</p> <p>A notification on Project status changes was initially circulated to the EAO and Aboriginal groups in writing on September 9, 2024. A follow up to the notification was provided on January 22, 2025 noting that commercial mill production (the start of the Operations as defined by the EAC), will occur following this.</p>	Ongoing	IC	N/A
EAC Condition 7 <b>Compliance Notification</b>	<p>The Holder must notify the EAO and Aboriginal Groups:</p> <ol style="list-style-type: none"> <li>as soon as practical; and</li> <li>in any event, no more than 72 hours, after the Holder determines that the Holder has not, or may not have, fully complied with this Certificate</li> </ol>	<p>BW Gold was inspected by EAO CEB in February, March, and May. BW Gold maintains a non-compliance tracking register from EAO CEB inspections to support timely close-out of findings.</p> <p>On August 30, 2024, BW Gold notified EAO that approximately 1.2 ha area had been cleared outside of the CPD to create a fire break around the operations camp.</p>	Ongoing	IC	C7
EAC Condition 8 <b>Transfer of Certificate</b>	<p>Transfer of Certificate</p> <ol style="list-style-type: none"> <li>Except as provided below, neither this Certificate nor any interest in it may be transferred to any person. This Certificate will be effectively transferred if the proposed Holder acknowledges that, upon transfer, it will be responsible for complying with the conditions of the Certificate, and both the proposed Holder and the Holder: <ol style="list-style-type: none"> <li>obtain consent for the transfer from the Executive Director;</li> <li>apply under section 19 of the Act for such amendments to this Certificate, if any, as the Executive Director deems necessary to ensure compliance with and enforceability of this Certificate and to otherwise reflect the proposed transfer; and</li> <li>confirm by written notice to the Executive Director, within 14 days of the completion of all aspects of the transfer transaction other than this notice, that the transfer has been completed.</li> </ol> </li> <li>An interest in this Certificate may be transferred by way of a grant of security to lenders or financiers without consent.</li> <li>A transfer of this Certificate to a trustee in bankruptcy, by a receiver or a trustee in bankruptcy pursuant to a court approved sale, or as part of a court approved arrangement under the Company Creditors Arrangement Act may occur without consent.</li> </ol> <p>If this Certificate is transferred without consent under paragraphs (b) or (c), the new and former Holder must notify the Executive Director within 30 days of the transfer and apply within the time specified by the Executive Director for any amendments to this Certificate that the Executive Director deems necessary to ensure compliance with and enforceability of this Certificate and to otherwise reflect the proposed transfer.</p>	<p>A Section 33 Order, transferring the Environmental Assessment Certificate to BW Gold for #M19-01 was approved on August 7, 2020.</p>	Complete	IC	N/A
EAC Condition 9 <b>Transfer of Interest in the Project</b>	<ol style="list-style-type: none"> <li>Except in connection with the granting of security to Project lenders or financiers, prior to the Holder transferring a significant interest in the Project, the Holder and proposed transferee must: i) obtain consent for the transfer from the Executive Director; and ii) Apply under Section 19 of the Act for such amendments to this Certificate, if any, as the Executive Director deems necessary to ensure compliance with and enforceability of this Certificate and to otherwise reflect the proposed transfer.</li> <li>A transfer to a trustee in bankruptcy, by a receiver or a trustee in bankruptcy pursuant to a court approved sale or as part of a court approved arrangement under the Company Creditors Arrangement Act may occur without consent.</li> <li>If a significant interest in the Project is transferred without consent under paragraph (b), the Holder must notify the Executive Director within 30 days of the transfer and apply within the time specified by the Executive Director for any amendments to this Certificate that the Executive Director deems necessary to ensure compliance with and enforceability of this Certificate and to otherwise reflect the proposed transfer.</li> </ol>	<p>A Section 33 Order, transferring the Environmental Assessment Certificate to BW Gold for #M19-01 was approved on August 7, 2020.</p>	Complete	IC	N/A
EAC Condition 10 <b>Document Submission Plan</b>	<p>The Holder must develop a plan for approval by the EAO identifying proposed dates or timelines for submission of every plan, program or other document required by this Certificate and for submissions made under Condition 26 (Water Quality Management). The plan must be developed in consultation with the Ministry of Energy, Mines and Petroleum Resources (EMPR), the Ministry of Environment and Climate Change Strategy (ENV), the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD), Northern Health Authority (NHA), Aboriginal Groups, the District of Vanderhoof, and Village of Fraser Lake.</p> <p>The Document Submission Plan does not apply to Condition 14 (Existing Disturbance), Condition 19 (the Environmental Monitoring Committee [EMC]), Condition 34 (Closure and Post-Closure Water Quality Management Plan), and Condition 43 (Mitigations Table Update).</p> <p>The Holder must provide the draft plan to EMPR, ENV, FLNRORD, NHA, Aboriginal Groups, the District of Vanderhoof, and the Village of Fraser Lake at least of 45 days prior to providing the draft plan to the EAO for review and approval, unless otherwise authorized by the EAO. The plan must be submitted to the EAO for review and approval at least 75 days prior to the first submission deadline in the Document Submission Plan, unless otherwise authorized by the EAO.</p> <p>The Document Submission Plan must demonstrate how the proposed dates or timelines align with any similar requirements in other provincial processes.</p> <p>The Document Submission Plan, and any amendments or updates thereto, will become the dates or timelines required for submission of plans, programs or other documents required by this Certificate once the plan is approved by the EAO, and thereby replacing the submission timelines set out in the applicable conditions.</p>	<p>Version 4.0 was formally submitted on March 18th, 2022.</p> <p>Version 5.0 was submitted to EAO and Aboriginal groups on June 30th, 2022 with a copy of comment and responses received on Version 4.</p> <p>Version 6.0 of the Document submission Plan was submitted to EAO and Aboriginal groups on July 7, 2022 - the only change between v5 and v6 was an update to the date of the Care and Maintenance plan submission to be in line with guidance provided by EMLI in a letter received from Lowell Constable on April 11, 2022.</p> <p>Version 7.0 of the Document submission Plan was submitted to EAO, other applicable regulatory agencies and Aboriginal groups on November 18, 2022. No comments were received on Document submission Plan (v7); however, we did receive some clarification requests from Anna Huang with Northern Health. BW Gold requested approval of version 7.0 from EAO after the comment period ended on December 20, 2022.</p> <p>No updates to the Document submission Plan were made in 2024.</p>	Ongoing	IC	N/A
EAC Condition 11 <b>Care and Maintenance Plan</b>	<p>The Holder must retain one or more Qualified Professionals to develop a plan for Care and Maintenance. This plan must cover Care and Maintenance periods for both indefinite and definite time frames. The plan must be developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups. The plan must include, at a minimum, the means by which the following will be addressed:</p> <ol style="list-style-type: none"> <li>spill prevention and response for hydrocarbon storage and leaks and other accidental emissions from machinery or equipment;</li> <li>sediment and erosion control;</li> <li>management of tailings and waste rock;</li> <li>building maintenance;</li> <li>measures to monitor and mitigate adverse effects to wildlife;</li> <li>measures to monitor and mitigate adverse effects to receiving waters;</li> <li>measures to monitor, manage, and avoid build-up of water surplus to that required under Condition 33 (Mine Waste and Water Management Plan);</li> <li>the role of the Independent Environmental Monitor (IEM) required under Condition 12 and Aboriginal Group monitors required under Condition 17 during care and maintenance periods;</li> <li>access management; and</li> <li>a list of Documents required by this Certificate that this plan supersedes for as long as this plan is being implemented.</li> </ol> <p>The plan must identify and describe how each condition in this Certificate will either:</p> <ol style="list-style-type: none"> <li>apply in full or in part during Care and Maintenance; or</li> <li>cease to apply during Care and Maintenance; and</li> <li>provide a clear rationale for any conditions proposed to cease to apply under paragraph l) or apply only in part under paragraph k).</li> </ol>	<p>On March 2, 2023 BW Gold received a letter of approval from EAO to implement the C&amp;M Plan and revise based on any outcomes from the Major Works/Environmental Management Act (MA/EMA) permit application review process.</p> <p>There have been no revisions to the Care and Maintenance Plan since March 2023.</p>	Ongoing	IC	N/A

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
	<p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups to the EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 60 days prior to Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>This plan must be updated in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups prior to any Care and Maintenance period, unless otherwise authorized by the EAO. The plan and any amendments thereto, must be implemented during any Care and Maintenance period to the satisfaction of a Qualified Professional and to the satisfaction of the EAO.</p> <p>The plan and any amendments thereto, must be implemented during any Care and Maintenance period to the satisfaction of a Qualified Professional and to the satisfaction of the EAO.</p>				
EAC Condition 12 <b>Independent Environmental Monitor</b>	<p>The Holder must retain the services of one or more IEMs. The IEM(s) must be a Qualified Professional, unless otherwise approved by the EAO, with a minimum of five years of experience in monitoring construction and environmental mitigation for major mining projects in British Columbia (BC). The IEM(s) will:</p> <p>a) observe, record for, and report to, the EAO and Aboriginal Groups on compliance with the Certificate; and, b) provide information to the EAO and Aboriginal Groups, EMPR, ENV, and FLNRORD, as directed by the EAO. Subject to any exceptions set out in the terms of engagement for the IEM(s), when providing information or reports to the EAO and Aboriginal Groups, the IEM(s) must not provide such information or reports to the Holder in advance of providing such information or reports to the EAO and Aboriginal Groups.</p> <p>The Holder must retain the IEM(s) throughout Construction, Operations, Closure and Post-Closure of the Project. The Holder must develop the terms of engagement for the IEM(s) in consultation with Aboriginal Groups, EMPR, ENV, and FLNRORD.</p> <p>No later than 60 days prior to the planned commencement of Construction, the Holder must submit to the EAO and Aboriginal Groups for review the name, organization, qualifications and relevant experience of the proposed IEM(s) and the IEM(s) terms of engagement.</p> <p>The Holder must not start Construction until the selection of the IEM(s) and the terms of engagement have been approved by the EAO.</p> <p>The terms of engagement must include, at a minimum, the following:</p> <p>c) the role, responsibilities and qualifications of the IEM(s); d) the roles, responsibilities and qualifications of any staff or other persons that will assist the IEM(s) with performing the IEM's roles and responsibilities (each an "IEM(s) Support"); e) the nature and frequency of monitoring; f) the process whereby the IEM(s) or an IEM(s) Support will make recommendations to the Holder to take mitigative or corrective actions to address any non-compliance or potential non-compliance with this Certificate; g) the process by which the recommendations in section f) above will be communicated to the EAO, the Aboriginal Groups, and the Holder; h) the situations in which the IEM(s) will have the authority from the Holder to stop work on part or all of the Project if the IEM(s) determines that:</p> <p>i) The Holder has not, or may have not, complied fully with the requirements of this Certificate; and, ii) Stopping work is necessary to prevent or reduce Project-related adverse effects as determined by the IEM(s) or any IEM(s) support.</p> <p>) the means by which the Holder, in consultation with Aboriginal Groups, EMPR, ENV, and FLNRORD may review the approved IEM(s) terms of engagement and submit a revised IEM(s) terms of engagement to the EAO for approval j) the provision of access to the Project Site so the IEM(s) can perform its duties, and the process by which that access will be provided; k) a process and protocols for inviting the Aboriginal Group monitors required by Condition 17 (Aboriginal Group Monitor and Monitoring Plan) in site inspections, including identification of circumstances under which those opportunities may be limited (if any) and how, in those cases, information will be provided to Aboriginal Group monitors following those inspections; l) the details of a Project phase completion report to be submitted to the EAO and Aboriginal Groups upon completion of each of Construction, Operations, Closure and Post-Closure phases. The reports must be written by the IEM(s) and include, but is not necessarily limited to:</p> <p>i) a record of all non-compliances with this Certificate; ii) a record of the recommendations made by the IEM(s) to the Holder to prevent or address any non-compliance with this Certificate; iii) a record of whether and how any such recommendations from the IEM(s) were implemented and the corresponding outcome of implementation; iv) a record of all stop work orders issued to prevent or address a noncompliance with this Certificate and any Provincial or Federal legislation or authorization applicable to the Project; v) assessment of the effectiveness of the mitigation measures for Construction, Operations, Closure and Post-Closure; and, vi) recommendations on how to achieve and maintain compliance with the conditions of this Certificate for the next Project phase. m) a requirement that a detailed work plan for each phase of the Project be submitted to the EAO for approval prior to the start of the relevant Project phase. The work plans must describe the frequency of inspections and rationale, the manner in which IEM(s) identified non-compliances will be communicated to the EAO, Aboriginal Groups, and the Holder, and the format and frequency of IEM(s)' reports.</p> <p>Condition 3 (Adaptive Management) does not apply to this Condition.</p>	<p>On August 15th, 2022, BW Gold received a draft letter from EAO approving the Independent Environmental Monitor Terms of Engagement (IEM TOE) for review and comment. BW Gold responded to the draft letter on Aug 16th.</p> <p>On August 31st, 2022, BW Gold received a letter from EAO approving Condition 12.</p> <p>The IEM TOE was updated September 6, 2024, and included changes made in response to comments provided by Aboriginal Groups and EAO. The change log summarizing those changes is provided in Appendix C12.</p> <p>The IEM completed 11 inspections in 2024. These inspections occurred approximately once per month. A scheduled inspection in July was cancelled due to wildfire activity resulting in the evacuation of the Mine.</p> <p>To discuss findings and upcoming inspections, meetings between including BW Gold, the IEM, and Aboriginal Groups were held, these occurred monthly; however, during the September meeting only BW Gold and the IEM were present and the meeting was postponed until October.</p> <p>The IEM provided a summary presentation of H1 2024 IEM inspection findings to the ELOMC on June 27, 2024.</p> <p>IEM reports from 2024 are included as Appendix C12.</p>	Ongoing	IC	C12
EAC Condition 13 <b>Construction Environmental Management Plan</b>	<p>The Holder must retain one or more Qualified Professionals to develop a Construction Environmental Management Plan. The plan must be developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups. The plan must include, at a minimum, the means by which the following will be addressed:</p> <p>a) access management; b) invasive plants management; c) waste management; d) emergency response; e) human-wildlife conflict; f) visual resource management; g) erosion and sediment control h) spill prevention and response for hydrocarbon storage and leaks or other accidental emissions from machinery or equipment; i) metal leaching (ML) and acid rock drainage (ARD) management; j) geological and terrain hazards; and k) vegetation management.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD and Aboriginal Groups to the EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 90 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan and any amendments thereto, must be implemented to the satisfaction of the EAO.</p>	<p>On August 31st, 2022, BW Gold received a letter from EAO approving Condition 13.</p> <p>The Construction Environmental Management Plan (CEMP) was implemented in 2024. Key implementations included:</p> <ul style="list-style-type: none"> <li>Managing access to site with appropriate signage and a security checkpoint;</li> <li>Implementation of invasive plant mechanical treatments;</li> <li>Reinforcing waste management best management practices through orientation, toolbox talks, informative signage, labelled bins, and weekly inspections;</li> <li>Training on wildlife awareness as part of orientation, information bulletins, and daily toolbox talks that include reviews of reporting procedures, conflict mitigations, and prohibitions.</li> <li>Sediment and erosion control inspections with a focus on active work areas, interfaces with sensitive receptors, and engineered channels.</li> <li>Metal Leaching and Acid Rock Drainage (MLARD) samples are collected and analyzed at the frequency required as per the MLARD Management Plan.</li> </ul> <p>A summary of CEMP implementation will be reflected in the M-246 Annual Reclamation Report (March 31, 2025).</p>	Ongoing	IC	N/A
EAC Condition 14 <b>Existing Disturbance</b>	<p>Within 90 days of the issuance of this Certificate, or as otherwise authorized by the EAO, the Holder must provide to the EAO and Aboriginal Groups a report documenting and describing all physical works and infrastructure built in the areas described in Schedule A to this Certificate, as of the date of this Certificate. The report must include:</p> <p>a) maps of the physical works and infrastructure at a scale sufficient to clearly document the location and area of disturbance for all physical works and infrastructure; and b) Photographs documenting all works and infrastructure.</p> <p>The report must be to the satisfaction of EAO.</p>	<p>The Existing Disturbances report was submitted on September 20, 2019.</p> <p><a href="https://projects.eao.gov.bc.ca/api/public/document/5e3481183bf9020021ebe2e1/download/Blackwater_ExistingDisturbanceReport_20190920.pdf">https://projects.eao.gov.bc.ca/api/public/document/5e3481183bf9020021ebe2e1/download/Blackwater_ExistingDisturbanceReport_20190920.pdf</a></p>	Complete	IC	N/A
EAC Condition 15 <b>Indigenous Cultural Awareness and Recognition</b>	<p>At least 90 days prior to commencing Construction in an Aboriginal Group's asserted or established traditional territory, the Holder must commence consultation with the Aboriginal Group to identify opportunities for cultural awareness and recognition.</p> <p>The Holder must offer opportunities to Aboriginal Groups that include, but are not limited to, holding ceremonies, installing signage, executing cultural protocols, recognizing cultural heritage, and providing cultural awareness training to Employees.</p> <p>If specific opportunities for cultural awareness and recognition are requested by an Aboriginal Group, the Holder must determine the scope and content of the cultural awareness and recognition opportunity and associated activities, in consultation with the Aboriginal Group and must support or conduct such activities, or must provide a rationale to the Aboriginal Groups explaining why a specific request or activity is not practicable, to the satisfaction of the EAO.</p>	<p>In the preconstruction and early construction phases, in consideration of Environmental Assessment (EA) Condition 15, Traditional Knowledge (TK) from the Nechako First Nations (NFNs) (made of Stellat'en (StFN), Saik'uz (SFN) and Nadleh Whut'en (NWFN) Nations – formerly Carrier Sekani First Nations (CSFN)), Nazko First Nation (NFN), Lhoosk'uz Dene Nation (LDN) and Ulkatcho First Nation (UFN) has been incorporated into cultural orientation for the mine site. The Cultural Awareness video created in 2022 was reviewed and approved for use by all Aboriginal Groups (LDN/UFN, NFN, NFNs) and incorporated into Mine site Orientation as of May 2023. Cultural Orientation is given to all contractors, overnight visitors and BW Gold employees at the mine site. This video complements the cultural awareness content previously developed in collaboration with Aboriginal</p>	Ongoing	IC	N/A

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
		<p>groups in 2022 (Provide link to video). Discussions with NFN and NFNs around signage for cultural awareness and recognition have been initiated and are ongoing. BW Gold continues to engage Aboriginal Groups on cultural orientations. In 2024 these efforts included a meeting with elders from LDN and UFN in November.</p> <p>In June 2024, the company celebrated Indigenous History month and acknowledged the National day for truth and reconciliation on June 21. Indigenous Relations staff attended local events to mark the day. BW Gold sponsorship and donations were provided to LDN, UFN, NFNs, and NFN, to support ceremonies and celebrations in community.</p> <p>The week of September 30, 2024, BW Gold conducted companywide efforts to observe, learn and participate in the National Day for Truth and Reconciliation. Activities included hosting lunch and learn cultural awareness sessions, supplying orange colored clothing to employees to show support for survivors, their families and communities. A series of four cultural safety toolkits were created to be delivered to employees and contractors as part of the daily morning safety talks. BW Gold sponsorship and donations were provided to LDN, UFN, NFNs, and NFN to support ceremonies in community.</p> <p>On March 25, 2024 a Mountain Cleansing ceremony was held with elders from LDN and NFN. The ceremony included smudging of the camp, a cleansing fire, the tying off of ribbons in the four directions and the distribution of medicine bundles made by elders.</p> <p>In 2023 the NFNs were offered the opportunity to conduct a cultural ceremony in their territory. Discussions centered around aligning the ceremony to mark the construction of the transmission line. BW Gold continues to support such a ceremony following direction and guidance from the NFNs.</p> <p>The NFNs Aboriginal Group Monitors (AGM) were engaged for construction activities in culturally sensitive areas.</p>			
<p>EAC Condition 16</p> <p><b>Aboriginal Group Engagement Plan</b></p>	<p>The Holder must retain a Qualified Person to develop an Aboriginal Group Engagement Plan. The plan must be developed in consultation with Aboriginal Groups.</p> <p>The plan must include at least the following:</p> <p>a) the means by which the Holder will engage with each Aboriginal Group on the implementation of the requirements of this Certificate during Construction, Operations, Closure and Post-Closure;</p> <p>b) the means by which the Holder will engage with each Aboriginal Group on the selection of the IEM(s);</p> <p>c) the means and timing by which Aboriginal Groups will be updated on the implementation of the requirements of this Certificate, including updates that are carried out to plans, programs or other documents required by this Certificate;</p> <p>d) the means by which the Holder will invite the Aboriginal Groups to provide to the Holder or the EAO their views on the updates set out in paragraph (c) or on the implementation of this Certificate generally, and specify a reasonable period during which the Aboriginal Groups may submit such views to the Holder;</p> <p>e) the means by which the Holder will maintain a record of such consultation including the matters discussed, responses, and resolution with Aboriginal Groups regarding the implementation of this Certificate; and</p> <p>f) the means and timing by which the Holder will provide a copy of such consultation record to Aboriginal Groups.</p> <p>In developing the requirements under paragraph (a), the Holder must determine with each Aboriginal Group, and include in the plan, the manner by which to engage with each Aboriginal Group, including:</p> <p>g) the methods of engagement;</p> <p>h) how any engagement customs or protocols of the Aboriginal Groups made available to the Holder by any Aboriginal Group will be incorporated in the plan, and identification and rationale for not including any specific customs or protocols;</p> <p>i) the type of information and the period of time to be provided when seeking input;</p> <p>j) the process to be used by the Holder to undertake a full and impartial consideration of any views and information presented on the subject of the consultation; and</p> <p>k) the period of time and the means by which to advise Aboriginal Groups of how their views and information were considered by the Holder.</p> <p>Within 30 days of receiving a written request from the EAO, the Holder must provide a copy of the consultation record to the EAO, unless otherwise authorized by the EAO.</p> <p>The Holder must provide the draft plan that was developed in consultation with Aboriginal Groups to Aboriginal Groups and the EAO for review a minimum of 90 days prior to the planned commencement of Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The Holder must not commence Construction until the plan has been approved by the EAO, unless otherwise authorized by the EAO.</p>	<p>The Aboriginal Group Engagement Plan (AGEP) was approved on April 19th, 2022. No updates were made to the AGEP in 2023 or 2024. The approval states <i>'BW Gold may proceed to implement the plan. Please review and revise the plan in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) in accordance with timelines referenced in the Aboriginal Group Engagement Plan, Plan Review.'</i></p> <p>Implementation of the AGEP initiated in late September, 2022. BW Gold has continued to engage Aboriginal groups on updates to management plans and through the provision of regular project updates, primarily through monthly meetings of the Environmental Life of Mine Committee (ELoMC). Additional details on those discussions can be seen under Condition 19, while updates to applicable management plans have been noted under applicable conditions in this report.</p> <p>BW Gold has been meeting with Aboriginal group representatives and leadership individually to discuss environmental issues and implementation of management plans including upcoming field work planned.</p> <p>BW Gold also facilitated monthly IEM meetings between the IEM and LDN, UFN, NFNs and NFN in 2023 and 2024.</p> <p>BW Gold continues to engage the nations in regular dialogue, on implementation of environmental monitoring program.</p>	<p>Ongoing</p>	<p>IC</p>	<p>N/A</p>
<p>EAC Condition 17</p> <p><b>Aboriginal Group Monitor and Monitoring Plan</b></p>	<p>For each Aboriginal Group, the Holder must retain, or provide funding to retain, a minimum of one monitor for each Aboriginal Group prior to commencing Construction. The monitors must be retained throughout Construction, Operations and Closure. The scope of the monitor's activities will be related to monitoring for potential effects from the Project on the Aboriginal Group's Aboriginal Interests.</p> <p>The monitor must be approved by the Aboriginal Group and the Holder, unless otherwise authorized by EAO.</p> <p>The Holder is not required to retain a monitor or fund the retention of the monitor, during periods where there is no one willing or able to carry out the duties of a monitor on behalf of that particular Aboriginal Group.</p> <p>Any Aboriginal Group may notify the Holder and the EAO in writing that the Aboriginal Group wishes to have the same monitor as another Aboriginal Group, rather than each having separate monitors, as well as specifying the time-period or Project phase over which this would occur.</p> <p>The Holder must develop an Aboriginal Group Monitoring Plan. The plan must be developed in consultation with Aboriginal Groups. The plan must include at least the following:</p> <p>a) a process for determining whether any Aboriginal Group prefers that the Aboriginal monitor be retained by the Holder or by the Aboriginal Group;</p> <p>b) for monitors retained by the Holder, how the Holder will work with the Aboriginal Group(s) to identify, recruit and retain monitors through Construction, Operations and Closure; and</p> <p>c) for monitors retained by the Aboriginal Group(s):</p> <p>i) How the Holder will, on a regular basis, seek confirmation from the Aboriginal Group(s) that a monitor has been retained that is available to, and capable of, carrying out the activities in the terms of engagement; and</p> <p>ii) The process for the Holder to provide funding to the Aboriginal Group(s), including timing for provision of funds, in order for the Aboriginal Group to retain a monitor to conduct the activities set out in the Terms of Engagement.</p> <p>For all monitors, the Holder must develop a Terms of Engagement in consultation with Aboriginal Groups. The Terms of Engagement must include at least the following:</p> <p>d) the role and responsibilities of the monitor, including:</p> <p>i) the nature and frequency of the monitoring activities that will be conducted by the monitor, including the participation of the monitor in dam safety inspections and related activities, and activities during Care and Maintenance periods;</p> <p>ii) the means and methods by which monitoring activities are undertaken;</p> <p>iii) opportunities to collect samples from water, soil and other environmental media and have them analysed; and</p>	<p>Individual Aboriginal Group Monitoring Plan Terms of Engagement (ToEs) were prepared and submitted separately to LDN, UFN, NFN and the NFNs. On February 18 2022 EAO provided BW Gold with a letter approving the Aboriginal Group Monitor and Monitoring Plan (AGMMP).</p> <p>The approval states <i>'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'</i>.</p> <p>These ToEs were updated in draft in 2024, and discussed with Aboriginal Groups.</p> <p>In 2024, the AGM role was fulfilled for both LDN and UFN up to and including the month of April. The monitors that were in these roles were successfully completed a month-long course (Environmental Technician Certificate) in May at Vancouver Island University. In May, both of those AGMs accepted positions and as environmental technicians working for BW Gold.</p> <p>On May 9<sup>th</sup>, an AGM for UFN was hired. The LDN remained vacant for the remainder of 2024, despite consistent efforts to hire. This position vacancy was reviewed in a monthly manner at Environmental Monitoring Board (EMB) meetings. In October, a workplace injury prevented the UFN AGM from completing duties from site for the remainder of the year but provided the opportunity for training and in-depth management plan review remotely. For the months that an AGM was not present on site, no AGM reports were issued.</p> <p>NFNs AGM was utilized in Q2 for Transmission Line (TL) monitoring of construction activities. The monitor remained on the project till its construction completion in 2024.</p> <p>A summary of 2024 AGM activity will be provided as Appendix C17 by March 31, 2025.</p>	<p>Ongoing</p>	<p>IC</p>	<p>N/A</p>

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
	<p>iv) participation in compliance inspections with the EAO;</p> <p>e) protocols for access to the Project and access to monitoring locations;</p> <p>f) The training, equipment and support that will be provided to the monitors to support the monitoring activities identified in paragraph d), including:</p> <p>i) safety equipment and training;</p> <p>ii) training prior to the Project phase where those activities will occur, or where a monitor is retained by the Holder or Aboriginal Group after that phase has begun, the training must be provided prior to the monitor conducting those activities;</p> <p>g) the provision of, and opportunity to review, plans, programs and other documents required under this Certificate, and provision of reports by the monitor to the Holder and Aboriginal Groups, including:</p> <p>i) the content of, and frequency for, reporting information to the Holder and the monitor's Aboriginal Group;</p> <p>ii) a requirement that the monitor will be provided with a copy of any plan, program or document related to monitoring activities required by this Certificate within 7 days of a request from a monitor, unless otherwise authorized by the EAO; and</p> <p>iii) timely notification to the monitor when plans, programs or documents have been updated.</p> <p>h) how the monitor will receive direction from his or her Aboriginal Group on the values of importance to the Aboriginal Groups for monitoring;</p> <p>i) where such information has been made available to the Holder, incorporation of any protocols that exist between the Aboriginal Groups as to monitoring activities in areas of overlapping asserted traditional territories; and</p> <p>j) the means by which the Holder will ensure, on an ongoing basis, each monitor has the contact information for the EAO's Compliance and Enforcement team and how the Holder will request that the monitor contact the EAO's Compliance and Enforcement Team to advise if the monitor is interested in participating in any EAO inspections related to the implementation of conditions related to the monitor's terms of engagement. The contact information and request must be provided to monitors in written form.</p> <p>The Holder must provide the information and make this request to any new individual hired in the role as monitor, within 30 days of:</p> <p>i) where the monitor is retained by the Holder, the starting date for that individual's employment; or</p> <p>ii) where the monitor is retained by the Aboriginal Group, the date that the Holder is notified by the Aboriginal Group that a new monitor has been retained.</p> <p>Condition 3 (Adaptive Management), does not apply to this Condition.</p> <p>The Holder must provide the draft plan and draft terms of engagement that were developed in consultation with Aboriginal Groups to Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan and terms of engagement, and any amendments thereto, must be implemented prior to Construction and during Construction, Operations and Closure, and to the satisfaction of the EAO.</p>				
<p>EAC Condition 18</p> <p><b>Cultural and Spiritual Resources Management Plan</b></p>	<p>The Holder must retain a Qualified Person to develop a Cultural and Spiritual Resources Management Plan for the Construction, Operations and Closure phases. The plan must be developed in consultation with Aboriginal Groups, EMPR, ENV and FLNRORD. The plan must include at least the following:</p> <p>a) the types of historic, cultural and spiritual resources that will be addressed by the plan, including resources that are of cultural or spiritual significance to the Aboriginal Groups who may have cultural and/or spiritual resources in the Project Area;</p> <p>b) the process by which a Qualified Person is selected;</p> <p>c) how the Holder will consult and work with Aboriginal Groups to identify areas of cultural or spiritual importance that may be affected by the Project, and to determine whether the areas can be protected from impacts, or whether relocation of features of importance or activities under Condition 15 (Indigenous Cultural Awareness and Recognition) are needed to address effects;</p> <p>d) a chance find procedure that must include:</p> <p>i) mitigation measures to avoid or reduce adverse effects to chance finds;</p> <p>ii) training for Employees;</p> <p>iii) means and protocols for notifying Aboriginal Groups of finds, including maintenance of up to date contact lists for Aboriginal Groups;</p> <p>iv) means and protocols for involving Aboriginal Groups in the assessment of finds; and</p> <p>v) the means by which the Holder will document and make available to the relevant authorities any information the Holder has received from Aboriginal Groups on handling and storage of finds in consideration of any laws, customs or protocols identified by the Aboriginal Groups;</p> <p>e) the means by which the Holder will keep confidential any sensitive cultural, spiritual and/or site-specific information that the Aboriginal Groups have advised the Holder is considered confidential;</p> <p>f) the means by which the Holder will document the consultation in paragraph (c) with Aboriginal Groups and identify and implement measures in a manner that does not reveal confidential information on sites identified in paragraph e);</p> <p>g) means by which representatives and/or traditional knowledge holders from Aboriginal Groups will be involved in the implementation of the plan; and</p> <p>h) a procedure for providing written reports to Aboriginal Groups on the implementation of this plan, including provision of a summary written in plain language.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, FLNRORD, ENV and Aboriginal Groups to EMPR, FLNRORD, ENV, Aboriginal Groups and the EAO for review a minimum of 90 days prior to the planned commencement of Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The Holder must not commence Construction until the plan has been approved by the EAO, unless otherwise authorized by the EAO.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of a Qualified Person throughout Construction, Operations and Closure and to the satisfaction of the EAO.</p>	<p>On April 19<sup>th</sup>, 2022, BW Gold received a letter from EAO approving the Cultural and Spiritual Resources Management Plan (CSRMP) with the note to "BW Gold may proceed to implement the plan. Please review and revise the plan in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) in accordance with timelines referenced in the Cultural and Spiritual Resources Management Plan, Plan Revision."</p> <p>In 2024, no visits had been made to the mine site, and no new surveys were been conducted. The primary focus was on archaeological monitoring during construction activities, specifically when these activities occurred within 50 meters of known cultural heritage resources (CHR) along the transmission line route. Monitoring has occurred during vegetation removal, road and pad building, and the installation of poles and anchors.</p> <p>As a result of this monitoring, one culturally modified tree (CMT) was destroyed when a danger tree (cottonwood) was felled onto it, and one new archaeological site was discovered just south of structure 192. The site was identified while accessing structure 193. The location was immediately placed on stand-down, and the Nations and Archaeology Branch were notified. Tests at the location revealed additional intact site components along the west side of the right-of-way (ROW). To protect the site, the ROW was modified to the east, and a berm was erected. The Archaeology Branch was kept informed of the site's results and the roadway modifications. The Nations may consider placing log piles around the site to prevent future trespassing.</p> <p>Archer provided staffing for monitoring clearing and corridor management activities around CHR on the TL over six days between August 1 and December 31, 2024. These activities took place specifically on August 8, 9, 10, 11, September 20, and October 16. No new findings were reported.</p>	<p>Ongoing</p>	<p>IC</p>	<p>C18</p>
<p>EAC Condition 19</p> <p><b>Environmental Monitoring Committee</b></p>	<p>The Holder must establish, support and maintain an EMC. The EMC must be established at least 180 days before the draft Document Submission Plan required by Condition 10 is provided to the EAO, unless otherwise authorized by the EAO. The purpose of the EMC is to facilitate information sharing and provide advice to the Holder on the ongoing development and operation of the Project, and the implementation of requirements in this Certificate, in a coordinated and collaborative manner. The Holder must invite the EAO, EMPR, ENV, FLNRORD and Aboriginal Groups to participate in all EMC activities. Where a condition of this Certificate requires the Holder to seek Aboriginal Groups' input on the review of a plan, program or other document, prior to developing the plan, program or other document, the Holder must offer to hold a meeting of the EMC to discuss key issues that should be addressed in the particular plan, program or other document. The Holder must convene such meeting if supported by members of the EMC. The Holder must develop an EMC Terms of Reference in consultation with the EAO, EMPR, ENV, FLNRORD and Aboriginal Groups. The Terms of Reference must include, at a minimum: a) the mechanisms by which the Holder will facilitate the effective participation of Aboriginal Groups; b) consideration of joint chairing of meetings with Aboriginal Groups or use of a mutually acceptable facilitator; c) the minimum frequency with which the Holder will canvass the EMC for topics to be discussed, and how the Holder will document topics raised and when and how they will be addressed with the EMC, or provide a rationale for why they will not be discussed; d) frequency, timing, and location of meetings; e) methods for documentation of EMC meetings and how meeting minutes or notes will be finalized with EMC members f) identification of other agencies or organizations whose mandates pertain to the topics potentially discussed by the EMC, including federal agencies, and who will be invited to join discussions on those topics;</p> <p>g) methods and means for the EMC to obtain relevant advice, technical support, and expertise;</p> <p>h) how the EMC can coordinate with provincial processes;</p> <p>i) an approach to regularly evaluate the effectiveness of the EMC, including a schedule for these evaluations;</p> <p>j) the means by which the Holder will coordinate the review of plans, programs or other documents required by this Certificate when review by some or all parties in the EMC is required by this Certificate;</p> <p>k) means by which the Holder will ensure the views of EMC members are fully canvassed and discussed amongst the EMC, and how the Holder will document how it has considered those views;</p> <p>l) how the following topics, at a minimum, will be addressed with the EMC, unless otherwise authorized by the EAO:</p>	<p>The Environmental Monitoring Committee (EMC) was established on August 12, 2020.</p> <p>Following consultation and review, EAO approved the EMC terms of reference (ToR) on November 5, 2021.</p> <p>Following the March 2023 issuance of Mines Act Permit M-246 (M-246), the EMC TOR was updated to reflect applicable conditions in that permit. The name of the committee was updated accordingly, to the ELoMC. The revised terms of reference were finalized and submitted on August 16, 2023.</p> <p>In 2024 the ELoMC met approximately monthly and covered:</p> <ul style="list-style-type: none"> <li>2023 record of consultation – January 11 (including incorporation of NFNs comments on the Air Quality Fugitive Dust Management Plan (AQFDMP), Wildlife Monitoring and Mitigation Plan (WMMP), and CEMP)</li> <li>Condition 10 – Document submission Plan – Review of tracking table for annual EAC Plan Updates – January 25</li> <li>Condition 12 – Summary of 2023 IEM Inspections – January 25</li> <li>Condition 17 – AGMMP Summary of Reports – January 25</li> <li>Condition 39 – Final Transmission Line Routing Plan (FTLRP) Phase 2 – February 15</li> <li>Condition 30 &amp; 41 – 2023 Provincial Fish Monitoring – February 15</li> <li>Condition 12 – IEM ToE – February 15</li> <li>Condition 13 – 2023 Invasive Plant Monitoring Review – March 21</li> <li>Condition 23 – 2024 Wildlife Monitoring Activities – March 21</li> </ul>	<p>Ongoing</p>	<p>IC</p>	<p>C19</p>

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
	<p>i) status of implementation of the requirements of this Certificate;</p> <p>ii) results of ongoing environmental monitoring and adaptive management required by this Certificate, including all plans required by this Certificate, with the exception of the Community Effects Monitoring and Management Plan (CEMMP) (Condition 37) and the Health and Medical Services Plan (Condition 40);</p> <p>iii) potential non-compliances, and potential for non-compliances, with this Certificate;</p> <p>iv) if an initial dilution zone is being proposed in relation to Water Quality Management (Condition 26), the proposal and rationale for that proposal;</p> <p>v) water balance modelling to facilitate understanding of the Holder's management of water surplus to mine operation needs;</p> <p>vi) Project tailings storage facilities (TSF) design, operations, and monitoring of the TSF for structural safety and limiting the amount of water stored that is surplus to mine operation needs;</p> <p>vii) water management during Closure planning;</p> <p>viii) surface water and groundwater quality management and updates to modelling;</p> <p>ix) remediation measures for accidents and malfunctions;</p> <p>x) care and maintenance, including how the EMC will be consulted on updates to the plan required in Condition 11;</p> <p>xi) access management; and</p> <p>xii) compliance activities of the EAO related to the Project;</p> <p>m) when and how topics identified in l)(i) through xii) will be addressed; and</p> <p>n) how the Holder will provide information to support the topics to be discussed by the EMC, including the timing of providing that information in advance of meetings.</p> <p>Condition 3 (Adaptive Management) does not apply to the EMC Terms of Reference.</p> <p>The Holder must provide the draft EMC Terms of Reference that was developed in consultation with the EAO, EMPR, ENV, FLNRORD and Aboriginal Groups to the EAO for approval at the same time as the Document Submission Plan required in Condition 10 is provided to the EAO, unless otherwise authorized by the EAO. At the time the draft EMC Terms of Reference is provided to the EAO it must also be provided to Aboriginal Groups.</p> <p>The EMC Terms of Reference, and any amendments thereto, must be implemented throughout Construction, Operations, Closure and Post-Closure, and to the satisfaction of the EAO.</p>	<ul style="list-style-type: none"> <li>Condition 20 – 2023 Air Quality and Fugitive Dust Management Summary – April 18</li> <li>Condition 17 – 2023 Aboriginal Group Monitor Overview – April 18</li> <li>Condition 18 – Cultural and Spiritual Resources – July 25</li> <li>Condition 13 – Vegetation/Invasive Plant Management Plan Annual Summary – August 13</li> <li>Condition 18 – Cultural and Spiritual Resources/Archaeological Management and Impact Mitigation Plan – August 22</li> <li>Condition 36 – 2024 Accidents and Malfunctions Plan and Mine Emergency Response Plan (MERP) Implementation Review – August 22</li> <li>Condition 34 – Closure/Post Closure Water Management Plan – September 24</li> <li>M-246, PE 110652 Monitoring data – September 24</li> <li>Research and Development Plan for a TSF Closure Cover – September 24</li> <li>M-246, PE 110652 Condition 3.4 (Trigger Response Plan (TRP) for Authorized Discharges to Davidson Creek) – October 24</li> <li>M-246 Reclamation Trials – October 24</li> <li>M-246 Soil Management – October 24</li> <li>Condition 23f – Wildlife MP/Moose and Grizzly Management – November 28</li> <li>TL Electromagnetic Survey Literature Review – November 28</li> <li>EMA PE-110650 Waste and Emissions Summary – November 28</li> <li>Condition 32 – M-246, Chemicals and Materials Storage Plan – November 28</li> <li>M-246, Fuel Management and Spill Control Plan – November 28</li> <li>Annual ELoMC Effectiveness Evaluation – November 28</li> </ul>			
<p>EAC Condition 20</p> <p><b>Air Quality and Dust Management Plan</b></p>	<p>The Holder must retain a Qualified Professional to develop an Air Quality and Dust Management Plan. The plan must be developed in consultation with ENV, EMPR, NHA and Aboriginal Groups. The plan must include at least the following:</p> <p>a) the means by which the mitigation measures identified in the Mitigations Table required under Condition 43 for the valued component Air Quality will be implemented;</p> <p>b) the means by which guidance contained in EMPR's and ENV's guidance: Developing a Fugitive Dust Management Plan for Industrial Projects (May 2018, or as updated or replaced from time to time) is addressed;</p> <p>c) the identification and detailed descriptions of dust-emitting sources from the Project;</p> <p>d) the identification of environmental receptors to be monitored;</p> <p>e) a compliance monitoring program, including the locations of monitoring stations and equipment that will be used to conduct the monitoring;</p> <p>f) the contaminants of potential concern (COPC) and corresponding concentrations (triggers) that would cause the Holder to take corrective action to reduce contaminant concentrations to avoid adverse health effects to receptors identified in paragraph d);</p> <p>g) how this plan will inform the Wildlife Management and Monitoring Plan (Condition 23), and Country Foods Monitoring Plan (Condition 41); and</p> <p>h) how the Holder will notify the EAO, ENV, EMPR, NHA, Aboriginal Groups, IEM, and the public in the event that contaminant concentration triggers identified in paragraph f) are exceeded. The notification must include both a technical report and a plain language summary of the technical report.</p> <p>The Holder must provide the draft plan that was developed in consultation with ENV, EMPR, NHA, and Aboriginal Groups to ENV, EMPR, NHA, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, and Closure and to the satisfaction of the EAO.</p>	<p>On February 18th, 2022, BW Gold received a letter from EAO approving the AQFDMP.</p> <p>The AQFDMP was implemented through construction in 2024.</p> <p>No point source discharges occurred in 2024 as construction on the mill continued. Fugitive dust was the primary source of air emissions. Water trucks were in use during the dry summer months to mitigate dust emissions associated with active construction areas and unpaved construction roads.</p> <p>The Partisol unit operated throughout the year sampling for Particulate matter 2.5 and 10 following the National Air Pollution Surveillance (NAPS) program. Passive Air sample monitored weekly to 2x a week, continuously for NO2 and SO2. Carbon Monoxide (CO) was also monitoring at the Partisol unit. During the smoke impacted summer months, purple air monitors were set up as background particulate matter monitors were implemented as per LDN and UFN consultation of discerning whether the elevated particulate matter concentrations were a result of the nearby wildfires or site related.</p> <p>A 2024 annual report for the AQFDMP will be provided as Appendix C20 by March 31, 2025.</p>	Ongoing	IC	C20
<p>EAC Condition 21</p> <p><b>Noise and Vibration Effects Monitoring and Mitigation Plan</b></p>	<p>The Holder must retain a Qualified Professional to develop and implement a Noise and Vibration Effects Monitoring and Mitigation Plan. The plan must be developed in consultation with EMPR, ENV, NHA, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) the means by which the mitigation measures identified in the Mitigation Table required under Condition 43 for the valued component Noise and Vibration will be implemented, including at least the following:</p> <p>i) locating Construction and Operations camps so that noise levels experienced by Construction and Operations camps residents from road and air traffic and mine equipment are consistent with triggers developed by a Qualified Professional that are protective of human health;</p> <p>ii) a description of how the development of triggers under a) i) took into account Health Canada's "Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise" (April 25 2017 or as updated or replaced from time to time);</p> <p>iii) how the Holder will minimize noise through the consideration of the type of aircraft used and frequency of flights; and</p> <p>iv) the means by which the Holder will provide to individuals or groups that could hear the blasts a schedule for the timing of blasting;</p> <p>b) the following specific mitigations:</p> <p>i) housing the pebble crusher and grinding circuits in insulated structures, and positioning equipment in sheltered or enclosed locations; and</p> <p>ii) limiting aircraft taking off or landing at the Project to daylight hours only;</p> <p>c) identification of noise receptor locations for monitoring programs;</p> <p>d) how and when monitoring will be undertaken;</p> <p>e) identification of the area where noise from the Project could be heard, and consultation with Aboriginal Groups regarding how different noise levels potentially affect their activities within the identified area and the mitigation measures to address those effects;</p> <p>f) identification of land users who may be affected by Project noise and how information related to Project activities and the potential for noise will be communicated; and</p> <p>g) the process, including timelines, for receiving and responding to noise complaints.</p> <p>The Holder must provide the draft plan that was developed in consultation with ENV, EMPR, NHA, and Aboriginal Groups to ENV, EMPR, NHA, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, and Closure and to the satisfaction of the EAO.</p>	<p>On February 18th, 2022, BW Gold received a letter from EAO approving the Noise and Vibration Management Plan (NVMP).</p> <p>BW Gold completed construction phase monitoring at the locations outlined in the plan in November 2022.</p> <p>In 2023 monitoring occurred in May 2023 and November 2023. Following an EAO information request (September 14, 2023), it was noted that the May event did not occur over the full two day period (~46 hours). As a result, the November 2023 monitoring event occurred. Details regarding these sampling events were provided in the 2023 C5 report.</p> <p>To satisfy compliance requirements to have one spring sampling event and one fall event for noise and vibration monitoring during construction, sampling occurred in spring of 2024 for the required two-day period. Results of this monitoring are included in appendix C21.</p>	Ongoing	IC	C21
<p>EAC Condition 22</p> <p><b>Caribou Mitigation and Monitoring Plan</b></p>	<p>The Holder must retain a Qualified Professional to develop the Caribou Mitigation and Monitoring Plan to avoid, reduce and offset the Project's adverse effects on caribou and its critical habitat as defined in the Recovery Strategy for the Woodland Caribou, Southern Mountain population (Rangifer tarandus caribou) in Canada (Environment and Climate Change Canada (ECCC) 2014, or as updated or replaced from time to time). The plan must be developed in consultation with FLNRORD, ENV, EMPR, ECCC, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) the means by which the mitigation measures identified in the Mitigation Table required under Condition 43 for the valued component Caribou will be implemented;</p> <p>b) a requirement that during Construction the Existing Exploration Access Road (from its origin at the Kluskus-Ootsa Forest Service road to the Mine Site) and the Mt. Davidson Exploration Road, as identified in Figure A1-1 and A-2 of Schedule A to the Certificate, be decommissioned and caribou habitat disturbed by these roads be reclaimed in a manner that supports the reestablishment of caribou habitat;</p> <p>c) the type, timing and frequency for undertaking caribou surveys prior to commencement of Construction, as well as during Operations, and how that information will inform development and implementation of monitoring and mitigation measures during Construction and Operations;</p> <p>d) provision of survey results to Aboriginal Groups, FLNRORD, EMPR and ENV;</p> <p>e) scheduling Construction activities to take into account the caribou "least risk window" (as defined by Ungulate Winter Range Order U-7-012), including monitoring and implementation of management or mitigation measures to avoid or reduce impacts in the event caribou are observed in the area of the Project Site;</p> <p>f) the conditions under which work would be stopped if caribou are seen in the area during Construction;</p> <p>g) development and implementation of caribou awareness protocols for Employees;</p> <p>h) the timing and frequency, which must be at least once per year, unless otherwise authorized by the EAO, that the Holder will request to meet with FLNRORD and Aboriginal Groups to discuss opportunities for the Holder's Participation in provincial caribou regional initiatives and in initiatives related to caribou established under Section 5.2b)i.c. of the</p>	<p>BW Gold met with LDN, UFN, EMLI, FLNRORD and Environment and Climate Change Canada (ECCC) on January 26, 2022 to discuss the December 31, 2021 draft Caribou Mitigation and monitoring Plan (CMMP). Focus of the meeting was on monitoring.</p> <p>BW Gold received written comments on January 28, 2022 from ECCC on the December 31, 2021 version of the draft CMMP.</p> <p>BW Gold received a draft agreement for habitat securement from EMLI on January 28, 2022 and met with LDN, UFN, EMLI, FLNRORD and ECCC on the draft agreement later that day.</p> <p>BW Gold provided an updated section 4 of the draft CMMP to LDN, UFN, EMLI, FLNRORD, ENV and ECCC to review on January 28, 2022 after the parties agreed during the January 26 meeting that in the interest of time it would be helpful to share and collaborate on draft updates to the CMMP progressively.</p> <p>April 14th, 2022, BW Gold received an email from ECCC approving the CMMP (Federal Decision Statement condition 8.18).</p> <p>April 19, 2022, BW Gold received a letter from EAO approving the CMMP for implementation.</p>	Ongoing	IC	C23

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
	<p>Hubulhsooninats'uhoot'alh: Foundation Framework Agreement (July 22, 2018, or as updated or replaced from time to time), between the Province and the Southern Dakeh Nation Alliance. When FLNRORD and/or Aboriginal Groups agree to meet, the Holder must organize such meeting; and</p> <p>i) the development of a work plan for the Holder's Participation in those initiatives identified in paragraphh) when invited to do so by FLNRORD or the Ministry of Indigenous Relations and Reconciliation.</p> <p>The plan must also include a plan to offset the loss of caribou habitat with recovery and protection of caribou habitat that will benefit the same herd of caribou that is affected by the Project. The offsetting plan must include at a minimum:</p> <p>j) Demonstration of how the plan takes into consideration the assessment and proposals contained in the Application document: New Gold's Response to the May 25, 2018 Information Request from the Canadian Environmental Assessment Agency – Updated Assessment of Impacts to Southern Mountain Caribou and Proposed Caribou Offset, submitted on August 31, 2018 (August 2018 Caribou Memo), including with respect to:</p> <ul style="list-style-type: none"> <li>i) mapping of the caribou critical habitat altered or destroyed by the Project;</li> <li>ii) identifying offset locations within the Tweedsmuir-Entiako Herd Boundary;</li> <li>iii) defining ecological equivalency for areas of proposed offsets compared to the areas affected by the Project and related offset area ratios; and</li> <li>iv) providing a rationale for any deviation from the assessment or proposal in the August 2018 Caribou Memo, including how deviations result in the same or improved overall effectiveness in offsetting the adverse effects to caribou as compared to that included in the August 2018 Caribou Memo;</li> </ul> <p>k) demonstration of how the Holder has considered and designed the offsetting plan to be consistent with or to support any provincial and/or federal plans for the recovery of the herd of caribou affected by the Project;</p> <p>l) how, in identifying offset locations, the Holder sought and considered information on:</p> <ul style="list-style-type: none"> <li>i) areas currently used by caribou;</li> <li>ii) Traditional Knowledge and Traditional Land Use; and</li> <li>iii) areas that would create contiguous blocks of protected habitat;</li> </ul> <p>m) how the proposed offset selection takes into account the duration of effects, including the potential for the duration to change in the future, and technical and financial considerations;</p> <p>n) 1:20,000 scale topographic maps including UTM grid for areas proposed and secured for habitat-based offsetting;</p> <p>o) a description of how areas secured for habitat-based offsetting will be maintained;</p> <p>p) a monitoring program to determine the effectiveness of the offset; and</p> <p>q) the specific actions required on the part of the Holder to secure the offsets, identification of the extent to which the Holder has the ability to implement the offset and identification of actions required by other parties that have been identified by the Holder for the offsets to be fully secured and implemented.</p> <p>The Holder must provide the draft plan that was developed in consultation with FLNRORD, ENV, EMPR, ECCC, and Aboriginal Groups to the EAO, FLNRORD, EMPR, ENV, ECCC, and Aboriginal Groups for review a minimum of 180 days prior to the planned commencement of Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>Holder must not commence Construction on the Project Site until the plan has been approved by the EAO and the Holder has completed all actions identified in paragraph q) that are the Holder's responsibility to secure and implement, unless otherwise authorized by the EAO.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, Closure, and Post-Closure, and to the satisfaction of the EAO.</p>	<p>The Mt. Davidson exploration road was reclaimed in Q3 2024. This included the following activities:</p> <ul style="list-style-type: none"> <li>- Between 6.8 kilometers (km) – 5.2 km, natural reclamation occurring in center of road with vegetation. Rip road section tire tracks with 2 pronged 18 grader. A choke point was created by felling trees across road &amp; pile coarse woody debris.</li> <li>- Between 5.2 km and 3.8 km, natural reclamation occurring in center of road with vegetation. Rip road section tire tracks with 2 pronged 18 grader. A choke point was created by digging 3x 4 feet deep trench 2/3 across road with material piled behind, trenches to alternate for quad access to weave through.</li> <li>- Between 3.8 km and 0.0km, natural reclamation occurring in center of road with vegetation. Rip road section tire tracks with 2 pronged 18 grader. A choke point was created by digging 3x 4 feet deep trench 2/3 across road with material piled behind, trenches to alternate for quad access to weave through.</li> </ul> <p>In Q1 2024, BW Gold and WLRS discussed ways to coordinate the requirements of the CMMP with provincial monitoring initiatives to avoid duplication and maximize the utility of the data we collect.</p> <p>As noted in the CMMP, LDN and UFN are to lead the implementation of the offsetting program on the ground. British Columbia (BC) and Aboriginal groups will determine areas for restoration. A Memorandum of Understanding (MOU) for habitat restoration between LDN, UFN, and BC was progressed in 2024. This MOU will establish the mechanism for receiving and funding the offsetting program.</p> <p>In Q3 2024 LDN and UFN expressed that they do not want to be responsible for implementing the restoration portion of the offset, but they want to be involved. In Q4 2024, BW Gold, LDN and UFN discussed the reasons for the Nations change of perspective with respect to leading the implementation of the offsetting program on the ground.</p> <p>In 2024, the BW Gold environment team completed daily caribou monitoring on site in the vicinity of active construction. No caribou were observed during this monitoring.</p> <p>Additional details on implementation of the CMMP will be provided as part of appendix C23 by March 31, 2025.</p>			
<p>EAC Condition 23</p> <p><b>Wildlife Management and Monitoring Plan</b></p>	<p>The Holder must retain one or more Qualified Professionals to develop a Wildlife Management and Monitoring Plan. The plan must be developed in consultation with EMPR, ENV, FLNRORD, ECCC and Aboriginal Groups. The plan must include at least the following:</p> <p>a) the means by which the mitigation measures identified in the Mitigations Table required under Condition 43 for the following valued components: Amphibians, Bats, Forest and Grassland Birds, Waterbirds, Furbearers, Grizzly Bear, Invertebrates, Moose, Ecosystem Composition and Plant species and Ecosystems at Risk will be implemented;</p> <p>b) the means by which the implementation and effectiveness of mitigation measures in the plan will be monitored;</p> <p>c) pre-construction surveys for wildlife features to be undertaken and the associated avoidance or mitigation measures to be undertaken if specified wildlife features are found in the Project Area, as listed in Table 1, including:</p> <ul style="list-style-type: none"> <li>i) the method(s), timing and duration for surveys and the related rationale for that method(s), timing and duration;</li> <li>ii) the identified measures to be undertaken in light of the requirements for different wildlife features; and</li> <li>iii) the circumstances under which the required measures in the Table 1 would not be implemented, if any, including a clear rationale for those exceptions and identification of alternative measures that will be applied.</li> </ul> <p>Table 1: Pre-Construction Surveys and Associated Avoidance and Mitigation Measures (INSERT TABLE HERE )</p> <p>d) the means by which information from the habitat suitability mapping for the Project Site will be confirmed or updated for the use of the Project Site by grizzly bears and moose prior to Construction at the Project Site, and in consultation with Aboriginal Groups. This must include:</p> <ul style="list-style-type: none"> <li>i) consideration of habitat identified through the Terrestrial Ecosystem Mapping of the Project Site contained in the Application and identification of the habitat types requiring further assessment;</li> <li>ii) identification of methods to be used to acquire the information, including consideration of applicable Resources Information Standards Committee guidance documents and other information made available to the Holder</li> <li>iii) the role of Aboriginal Group monitors or members of Aboriginal Groups in gathering the information;</li> <li>iv) after the information is gathered, an assessment of the adequacy of the mitigation measures proposed in the Mitigations Table required under Condition 43 in addressing the effects of the Project, in light of the new information gathered;</li> <li>v) if the assessment indicates that additional mitigation is required, the development of new or additional mitigations in a manner consistent with the BC EMP, and documentation of how the BC EMP was applied;</li> <li>vi) how the effectiveness of the mitigation measures identified in paragraphs d)iv) and d)v) will be monitored;</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>vii) the development of a technical report and a report for a lay audience that documents the activities and outcomes required under paragraphs d)i) to vi). The report must be provided to Aboriginal Groups at least 60 days prior to the start of Construction at the Project Site;</li> </ul> <p>e) the means by which the Holder will confirm effects on wildlife and ecosystems in the area flooded in the Davidson Creek watershed upstream of the TSF and the mitigation measures that will be applied to address identified effects;</p> <p>f) the timing and frequency, which must be at least once per year, or as otherwise authorized by the EAO, that the Holder will request to meet with FLNRORD and Aboriginal Groups to discuss the Holder's Participation in provincial moose and grizzly bear regional wildlife and resource management initiatives in Wildlife Management Units 6-01 and 7-12 and initiatives related to wildlife established under sections 5.2b)i.c. and 5.2b)i.g. under the Hubulhsooninats'uhoot'alh: Foundation Framework Agreement (July 22, 2018, or as updated or replaced from time to time) between the Province and the Southern Dakeh Nation Alliance. When FLNRORD and/or Aboriginal Groups agree to meet, the Holder must organize such meeting;</p> <p>g) the development of a work plan for the Holder's Participation in those initiatives identified in paragraph f) when invited to do so by FLNRORD or the Ministry of Indigenous Relations and Reconciliation;</p> <p>h) the development of sub-component plans, which must include:</p> <ul style="list-style-type: none"> <li>i) related mitigation measures, the type, timing and frequency for undertaking wildlife surveys during Construction and Operations, and how that information will inform development and implementation of monitoring and mitigation for the following species: <ul style="list-style-type: none"> <li>i. moose;</li> <li>ii. grizzly bears;</li> <li>iii. bats;</li> <li>iv. amphibians;</li> <li>v. birds (waterbirds and forest and grassland birds); and</li> <li>vi. furbearers;</li> </ul> </li> <li>ii) identification of sensitive life stages for grizzly bears, moose, furbearers, and birds and how the Holder will avoid or mitigate impacts during these time periods taking into account at least the following: <ul style="list-style-type: none"> <li>i. mitigation measures must include no-work zones, rescheduling construction activities, and applying minimum setbacks to construction activities. Where the Qualified Professional is of the view that such measures are not necessary or are impracticable, the plan must include clear justification as to under what circumstances those measures are not feasible or required and identification of alternative measures that are equally effective in mitigating effects; and</li> </ul> </li> </ul>	<p>August 31, 2022, BW Gold received a letter from EAO approving the WMMP.</p> <p>The WMMP was implemented in 2024. Key monitoring events included:</p> <ul style="list-style-type: none"> <li>• Pre-construction surveys;</li> <li>• Recording wildlife observations;</li> <li>• Pre-clearing surveys were conducted immediately preceding construction activities to occur in an area following sensitive timing windows;</li> <li>• Wildlife observations on site were recorded using an online survey form that is available to all personnel; and</li> <li>• Wildlife monitoring programs included: <ul style="list-style-type: none"> <li>• Grizzly bear trail camera trapping</li> <li>• Ungulate camera monitoring</li> <li>• Waterbird surveys</li> <li>• Ungulate pellet count surveys</li> <li>• Upland bird surveys</li> <li>• Clark's Nutcracker surveys</li> <li>• Bat Autonomous recording units surveys</li> <li>• Amphibian road mortality surveys</li> <li>• Amphibian breeding pond surveys</li> <li>• Facility waterbody monitoring</li> </ul> </li> </ul> <p>A report summarizing the activity will be provided by March 31, 2025.</p>	<p>Ongoing</p>	<p>IC</p>	<p>C23</p>

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	<p>ii. in identifying these life stages and mitigation measures, the Holder must document how it has taken into consideration the A Compendium of Wildlife Guidelines for Industrial Development Projects in the North Area, British Columbia. Interim Guidance, FLNRORD, 2014 (or as updated or replaced from time to time);</p> <p>i) the means by which the Wildlife Management and Monitoring Plan will inform the Country Foods Monitoring Plan (Condition 41) and the End Land Use Plan (Condition 25);</p> <p>j) establishment of policies that prohibit Employees, unless that activity is specifically related to employment requirements, from:</p> <ul style="list-style-type: none"> <li>i) fishing, hunting, or trapping;</li> <li>ii) harassing or feeding wildlife; or</li> <li>iii) possessing firearms; when travelling, for work-related purposes along Project Roads, the Kluskus and Kluskus-Ootsa Forest Service Roads, and/or when at the Project Site. The policies must identify the circumstances under which any of these activities may be allowed if they are by members of Aboriginal Groups exercising Aboriginal Interests;</li> </ul> <p>k) how the Holder will implement at least the following mitigation measures specific to the Project Site:</p> <ul style="list-style-type: none"> <li>i) management of lighting including direction, timing and intensity, to avoid adverse effects on wildlife, while meeting health and safety requirements;</li> <li>ii) regular monitoring of wildlife use of the TSF and water quality in the TSF to determine whether the water quality in the TSF poses a health risk to wildlife; and</li> <li>iii) measures t</li> </ul> <p>l) the means by which the Holder will implement at least the following mitigation measures specific to the transmission line right of way and transmission line access roads:</p> <ul style="list-style-type: none"> <li>i) after the transmission line is constructed, allowing the vegetation within the transmission line right of way to grow in order to minimize predator sight lines by maintaining limits of approach and, after vegetation has grown to one meter in height or more, not reducing the height of the plant community to any lower than one metre from ground level, unless the area is required for tower bases, guy anchor points or along existing access roads;</li> <li>ii) the means by which visual barriers will be created, as directed by a Qualified Professional, to reduce sight lines for predators along the transmission line right of way; and</li> <li>iii) a vegetation and access management plan for the transmission line right of way that sets out the timing and means by which all newly created access roads for the construction of the transmission line will be decommissioned and revegetated after they are no longer needed for Construction, the circumstances under which access may be reestablished for maintenance and/or repairs of the transmission line, and the means by which roads re-opened for maintenance or repair activity will be decommissioned and revegetated following the maintenance and/or repair activities to meet the requirements in paragraphs i) i) and ii);</li> </ul> <p>m) how the Holder will implement at least the following mitigation measures specific to road use:</p> <ul style="list-style-type: none"> <li>i) establishing a 50 kilometres per hour speed limit on all Project Roads;</li> <li>ii) identifying wildlife corridors and/or habitual crossing areas that intersect Project Roads and install and maintain wildlife crossing signs where those wildlife corridors intersect the Project Roads;</li> <li>iii) identifying wildlife corridors and/or habitual crossing areas that intersect the Kluskus and Kluskus-Ootsa Forest Service Roads and describe how the Holder will identify those to FLNRORD and offer to install and maintain wildlife crossing signs where those wildlife corridors intersect the Kluskus and Kluskus-Ootsa Forest Service Roads; and</li> <li>iv) the means and timing by which the Holder will notify FLNRORD of carrion resulting from impacts with Project Vehicles on Project Roads and the Kluskus and Kluskus-Ootsa Forest Service Roads, and when safe to do so, remove the carrion to a suitable location where the carrion can serve as a food source for wildlife, as determined by a Qualified Professional, unless FLNRORD is not able to authorize that removal and relocation;</li> </ul> <p>n) the means by which the Holder will, throughout all phases of the Project:</p> <ul style="list-style-type: none"> <li>i) record wildlife observations, wildlife mortalities observed, and significant interactions and/or conflicts between people and wildlife in the Project Area;</li> <li>ii) tabulate and submit the information recorded in paragraph n) i) to ENV, FLNRORD and Aboriginal Groups on an annual basis; and</li> <li>iii) report on identified risks to wildlife and/or people learned from such monitoring and how such risks will be addressed; and</li> </ul> <p>o) identify the project phase or phases applicable for each mitigation and/or management measure in the plan, including a rationale for why mitigation and/or management measures would not be applicable in a certain project phase or phases.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, ECCC, and Aboriginal Groups to EMPR, ENV, FLNRORD, ECCC, Aboriginal Groups, and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, Closure and Post-Closure and to the satisfaction of the EAO.</p>				
<p>EAC Condition 24</p> <p><b>Wetland Management &amp; Offsetting Plan</b></p>	<p>The Holder must retain one or more Qualified Professionals to develop a Wetland Management and Offsetting Plan, to offset losses of wetland functions caused by the Project, in consultation with FLNRORD, ENV, ECCC, EMPR and Aboriginal Groups. In this Condition, "wetland function" refers to the hydrological, ecological and wildlife lifecycle requirements provided by wetlands. The plan must include at least the following:</p> <p>a) the means by which the mitigation measures identified in the in the Mitigations Table required under Condition 43 for the valued component Wetlands will be implemented;</p> <p>b) a detailed description for each wetland that would be lost or altered as a result of the Project, including:</p> <ul style="list-style-type: none"> <li>i) an assessment of each wetland and wetland function that would be lost or altered based on Wetlands of British Columbia: A Guide to Identification (FLNRORD 2004, or as updated or replaced from time to time); and</li> <li>ii) the location and extent of these wetlands, including in relation to the local watershed;</li> </ul> <p>c) a description of the methods used to determine the functions and overall condition of wetlands;</p> <p>d) a description of the offsetting measures to be implemented by the Holder, including the amount and type of offsets required, the selection of offsetting sites, and a schedule and timeline for implementation of offsetting measures. The Holder is responsible for offsetting measures that compensate for expected losses of individual wetland functions described in (b);</p> <p>e) a description of how the plan applies the hierarchy of mitigation measures set out in the BC EMP;</p> <p>f) a description of how the selection of offsets took into account the extent to which the potential offsets would also provide additional habitat for grizzly bear and moose;</p> <p>g) a description of how input from Aboriginal Groups was considered in the identification and selection of potential locations for wetland offsets; and</p> <p>h) a description of how the implementation of the offsets and mitigation measures will be monitored for effectiveness.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, ECCC, and Aboriginal Groups to EMPR, ENV, FLNRORD, ECCC, Aboriginal Groups, and the EAO for review a minimum of 90 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate. The Holder must not commence Construction until the plan has been approved by the EAO, unless otherwise authorized by the EAO.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations and Closure and to the satisfaction of the EAO.</p>	<p>BW Gold resubmitted an updated Wetland Management and Offsetting Plan (WMOP) on December 16, 2022 to EAO and all required regulatory agencies and Aboriginal groups. EAO issued a letter to BW Gold February 14, 2023, approving the updated WMOP with two key points of direction.</p> <ol style="list-style-type: none"> <li>1. Engage in consultation with LDN and UFN to continue to evaluate Dykam Ranch as an offsetting option and consider other wetland initiatives as alternatives to fulfill the offsetting objectives of the plan.</li> <li>2. Update the plan to make it more concise and ensure it contains the necessary prescriptions and steps for implementation and to facilitate enforcement.</li> </ol> <p>EAO advised that the revision be complete within one year of receipt of the letter, unless otherwise authorized by the EAO.</p> <p>BW Gold worked with LDN and UFN through 2023 using remote sensing technologies to identify offsets that may be considered as substitutions to the current approved offsets. Field work was conducted on 4 potential offsetting locations in October 2023. This work is summarized in a report included with Appendix C24. Furthermore, EAO authorized an extension to the date required to resubmit the plan from February 14 to March 31, to allow all parties to review the alternative offsets report.</p> <p>The WMOP was updated in March 2024 to address those conditions. Comments were received on the WMOP; however, the comments have not yet been addressed by BW Gold, as discussions with LDN and UFN have been on-going.</p> <p>As noted in Appendix E of the WMOP, BW Gold provided a letter to LDN and UFN outlining its commitments to attempt to identify and evaluate alternative offsetting sites, and this work continued throughout 2024. To this end, on February 14, 2024, BW gold requested that LDN and UFN bring forward their own potential offsetting ideas by May 1, 2024. BW Gold conducted a desktop analysis of the ideas brought forward by LDN and UFN to determine if they would be aligned with Department of Fisheries and Oceans Canada (DFO) requirements for offsetting and BW Gold's commitments. A meeting to review the desktop analysis was held on July 12, 2024.</p> <p>Multiple discussions were held between July 12, 2024 and Dec 13, 2024 to align on the suitability of the potential offsetting ideas brought forward by LDN and UFN to replace approved offsets in the WMOP.</p> <p>In 2024, wetland monitoring was conducted in line with requirements outlined in the WMOP, including mini piezometer downloads and visual inspections of wetlands both within the CPD and outside of the CPD.</p>	<p>Ongoing</p>	<p>IC</p>	<p>C24</p>

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
EAC Condition 25 <b>End Land Use Plan</b>	<p>End Land Use Plan The Holder must retain one or more Qualified Professionals to develop an End Land Use Plan, consistent with Section 10 of the Health, Safety and Reclamation Code for Mines in British Columbia (June 2017, or as updated or replaced from time to time) at a minimum, for all disturbance areas within the Project Area, in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) a definition and description of the pre-mining land and water capability and land and water use conditions, using maps and tabular inventories, with respect to ecosystems and habitats and other uses in the area of the Project Area disturbances;</p> <p>b) a definition and description of the predicted post-closure land and water capability and land and water use conditions (based on changes that are expected to occur to topography and soil conditions due to mine development), using maps and tabular inventories, with respect to ecosystems and habitats, ability to exercise Aboriginal Interests and other uses for the Project Area disturbances;</p> <p>c) modelling, or other planning exercises, to reconcile or minimize differences between the pre-mining conditions (as per paragraph a) and post-mining projections (as per paragraph b) accounting for, but not limited to, Project design, terrain profiling and contouring, and optimization of soil conditions;</p> <p>d) documentation of the forecasted net changes in land capability between pre and post-mining conditions and how any opportunities to improve land capability from its previous state were considered and incorporated;</p> <p>e) incorporation of mitigation targets related to valued components examined in the Application, including but not limited to wildlife and wildlife habitat, vegetation, and ecosystems, and monitoring for those targets; f) how the plan will take into consideration the Caribou Mitigation and Monitoring Plan (Condition 22), Wildlife Management and Monitoring Plan (Condition 23), Water Quality Management (Condition 26), and Wetland Management and Offsetting Plan (Condition 24); and g) consideration of how water quality may affect the Holder's ability to achieve the end land use.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups to the EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of the Qualified Professional throughout Construction, Operations, Closure and Post-Closure, and to the satisfaction of the EAO.</p>	<p>A report summarizing the 2024 implementation of the WMOP will be provided by March 31, 2025.</p> <p>On March 2, 2023, BW Gold received a letter from EAO approving the End Land Use Plan (ELUP) for implementation with the direction to revise the plan in consultation with LDN and UFN and resubmit to the EAO six months following the completion of End Land Use (ELU) workshops, no later than September 30, 2025, unless otherwise authorized by the EAO.</p> <p>As noted in the ELUP, BW Gold envisions the ELUP to be an iterative and multi-variant process, and will incorporate reclamation research results, site knowledge, as well as experience and information gained through community engagement.</p> <p>Reclamation research planning was undertaken in 2024, including the activities summarized below.</p> <ul style="list-style-type: none"> <li>- A Closure and Post-closure Water Management Plan was prepared in Q3 2024. The purpose of the plan is to identify options to maintain acceptable water quality and instream flow in the receiving environment at mine closure and post-closure. Consultation with the ELoMC occurred in August 2023, October 2023, and September 2024.</li> <li>- A Tailings Storage Facility Closure Cover Research and Development Plan was prepared for implementation starting in 2025. The plan is aimed to demonstrate that the dry soil cover proposed to be installed on tailings beach areas of the TSF at closure, is adequate and can meet all the closure objectives. The document was reviewed with the ELoMC in September 2024.</li> <li>- The development of a Reclamation Research Program began in 2024, which includes research designed to address uncertainty identified in Table 4.2-8 identified in the Reclamation and Closure Plan.</li> <li>- As noted under the CMMP update, the Mt. Davidson exploration road was reclaimed in Q3 2024, consistent with ELU objectives.</li> </ul> <p>In 2024, the focus of community engagement was ELU workshop planning. A mine failure modes and effects analysis (FMEA) on closure condition of the TSF was collaboratively, with LDN and UFN, selected as the topic. Despite collective best efforts to hold this workshop in 2024, it has been delayed and is currently scheduled for April 7, 2025, pending UFN's confirmation of availability. Additionally, planning for a second end land use workshop in 2025 began in 2024.</p>	Ongoing	IC	N/A
EAC Condition 26 <b>Water Quality Management</b>	<p>a) During Construction, Operations, Closure, and Post-Closure, the Holder must ensure the Project does not cause downstream water quality to exceed BC Water Quality Guidelines, unless the Holder has developed and ENV has accepted one or more Science Based Environmental Benchmarks (SBEBs), in which case the accepted SBEB must not be exceeded. Downstream water quality includes water quality in, at a minimum, Davidson Creek and Creek 661, as monitored in accordance with paragraph (d) of this Condition.</p> <p>b) If the Holder develops SBEBs, these must be developed:</p> <ol style="list-style-type: none"> <li>in consultation with ENV and Aboriginal Groups;</li> <li>in accordance with ENV's "A Framework for the Development and Use of Freshwater Science-Based Environmental Benchmarks for Aquatic Life in Environmental Management Act Permitting for Mines" (March 2016, or as updated or replaced from time to time); and</li> <li>in consideration of Yinka Dene Water Law (YDWL) for Davidson Creek, and in consideration of any other water policies from Aboriginal Groups made available to the Holder for Davidson Creek and/or Creek 661; and submitted to the EAO, ENV and Aboriginal Groups within the time set out in Condition 10, the Document Submission Plan.</li> </ol> <p>c) If the Holder develops SBEBs, the Holder must produce a report that clearly documents how the YDWL and any other Aboriginal water policies referenced in paragraph b) iii) were considered in the development of SBEBs. Where site specific standards or metrics for YDWL for Davidson Creek or another Aboriginal Group's water policies for Davidson Creek and/or Creek 661 are made available to the Holder, the report must include a comparison of how the SBEB compares to those standards or metrics. The report must be provided to ENV, EMPR, EAO, and Aboriginal Groups in accordance with the time set out in Condition 10, the Document Submission Plan, and be to the satisfaction of the EAO.</p> <p>d) The Holder must monitor surface water quality at a location(s) determined by a Qualified Professional, in consultation with EMPR, ENV, and Aboriginal Groups.</p>	<p>In a letter dated February 18, 2022 EAO noted that BW Gold may proceed with the implementation of a number of documents, including the Science Based Environmental Benchmarks (SBEB) Development Plan.</p> <p>In a letter dated March 30, 2023 ENV approved the application of a SBEB for dissolved aluminum, based on baseline data demonstrating that it naturally exceeds BC Water Quality Guidelines in Davidson Creek, Creek 661, and Creek 661 tributaries.</p> <p>Through 2024 BW Gold collected downstream water quality samples per the Aquatic Effects Monitoring Plan (AEMP), a comparison of this data to the dissolved aluminum SBEB, and other parameters, will be presented on appendix C30 by March 31, 2025.</p>	Complete	IC	C30
EAC Condition 27 <b>Water Quality Report</b>	<p>The Holder must retain a Qualified Professional to develop a Water Quality Report. The report must be developed in consultation with Aboriginal Groups, ENV and EMPR. The report must include at least the following:</p> <p>a) a description of the water quality baseline available for the waterbodies listed in paragraph c) existing at the time the Certificate is issued, and any additional baseline collected for those waterbodies subsequent to the issuance of the Certificate. The description must include the locations, frequency and duration of sampling, and include consideration of YDWL, any other Aboriginal Group's water policies made available to the Holder, and guidance from ENV;</p> <p>b) clear documentation of how the baseline collection methods and scope compares to any methods specified in the YDWL, any other Aboriginal Group's water policies, and ENV guidance documents;</p> <p>c) water quality baseline for the following waterbodies:</p> <ol style="list-style-type: none"> <li>Tatelkuz Lake;</li> <li>Davidson Creek;</li> <li>Chedakuz Creek at a location where Chedakuz Creek would be expected to be affected by mine effluent discharge into Davidson Creek; and</li> <li>a location downstream of the location in paragraph c)iii) where no further effects on water quality from the Project is predicted;</li> </ol> <p>d) the rationale for the selection of the locations for the collection of baseline information;</p> <p>e) a comparison of site-specific water quality metrics or standards developed by Aboriginal Groups under their own Aboriginal water policies to the modelled water quality at a point on Chedakuz Creek where water received from Davidson Creek is fully mixed into Chedakuz Creek.</p> <p>The Holder is only required to provide the information in paragraph e) if a Carrier Sekani First Nation has provided to the Holder the site-specific measures or standards developed under the YDWL, or if another Aboriginal Group has provided site-specific measures or standards under its Aboriginal water policy that are relevant for the location specified in paragraph e).</p> <p>The report must be provided to Aboriginal Groups, ENV and the EAO in accordance with the timelines set out in the Document Submission Plan set out in Condition 10.</p> <p>The report must be developed to the satisfaction of a Qualified Professional and to the satisfaction of the EAO</p>	<p>A cumulative baseline water quality report was submitted as part of the MA/EMA permits application. BW Gold has addressed the EAC condition requirements in this report, which will also inform plans required by MA/EMA Guidance (e.g., Mine Site and Discharge Water Management and Monitoring Plan).</p> <p>Submission complete, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022.</p>	Ongoing	IC	N/A
EAC Condition 28 <b>Chedakuz Creek and Tatelkuz Lake Surface Water Quality Monitoring Plan</b>	<p>The Holder must retain a Qualified Professional to develop a surface water quality monitoring plan for Tatelkuz Lake and Chedakuz Creek upstream of the Nechako Reservoir. The plan must be developed in consultation with Aboriginal Groups, ENV and EMPR. The plan must include at least the following:</p> <p>a) monitoring locations;</p> <p>b) frequency of monitoring;</p> <p>c) the means by which the baseline information in Condition 27, Water Quality Report, and any other appropriate information or criteria as determined by a Qualified Professional, will be used to determine if there are adverse effects due to the Project to:</p> <ol style="list-style-type: none"> <li>Tatelkuz Lake; and</li> <li>Chedakuz Creek upstream of Nechako Reservoir;</li> </ol> <p>d) how the Holder has considered YDWL, other Aboriginal policies made available to the Holder from Aboriginal Groups, and ENV guidance in development of the criteria in paragraph c) e) conditions, if any, under which monitoring would no longer be required; and</p> <p>f) the means by which the Holder will communicate this information to Aboriginal Groups, including identification of the type of information to be provided, the frequency of reporting and the implications of the water quality observed at Chedakuz Creek for the Nechako Reservoir. Reports must include a summary written for a lay audience.</p>	<p>On February 18 2022 EAO provided BW Gold with a letter approving the Chedakuz Creek and Tatelkuz Lake Surface Water Quality Monitoring Plan. The approval states 'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'.</p> <p>In 2024, the Chedakuz Creek and Tatelkuz Lake Surface Water Quality Monitoring Plan was implemented successfully with the exception of locations and strictly timed programs that were impacted by wildfire. The 2024 summary of implementation will be included as part of Appendix C30 to be provided by March 31, 2025.</p>	Ongoing	IC	C30



EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
	<p>The Holder must provide this draft plan that was developed in consultation with Aboriginal Groups, ENV and EMPR to the EAO, ENV, EMPR and Aboriginal Groups a minimum of 60 days prior to the planned commencement of Construction, or as or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Operations, Closure and Post-Closure, and to the satisfaction of the EAO.</p>				
<p>EAC Condition 29</p> <p><b>Transmission Line Sedimentation Monitoring Plan</b></p>	<p>To supplement the sediment and erosion control requirements under the Construction Environmental Management Plan (Condition 13), the Holder must retain one or more Qualified Professionals to develop a plan to avoid sedimentation in waterbodies during construction and maintenance of the transmission line. The plan must be developed in consultation with ENV, FLNRORD, and Aboriginal Groups. The Plan must include at least the following:</p> <p>a) a requirement for the development of site-specific erosion and sediment control prescriptions for all transmission line construction and maintenance works that have the potential to impact YDWL Class 1 Waterbodies as set out in Appendix 1 and/or other waterbodies identified to be of cultural significance by other Aboriginal Groups, during transmission line construction and maintenance. The prescriptions must be prepared by a Qualified Professional who is also a Certified Professional in Erosion and Sediment Control (CPESC). The implementation of these prescriptions must be under the direction of a CPESC;</p> <p>b) prescriptions that detail the circumstances under which YDWL Class 1 Waterbodies and other waterbodies identified in paragraph a) (if any), will be monitored for turbidity and the specific monitoring methods that will be employed;</p> <p>c) monitoring for turbidity at a location upstream and a location downstream of Construction and maintenance activities;</p> <p>d) development of triggers for increases in turbidity as a result of the Project taking into consideration BC Water Quality Guidelines, YDWL and any policy provided to the Holder by other Aboriginal Groups that is relevant for the waterbodies identified in paragraph a) for turbidity;</p> <p>e) a description of how the Holder has considered the YDWL, other Aboriginal Groups' water policies applicable to the waterbodies</p> <p>f) the identification of mitigation and/or remediation measures in the event that such triggers in paragraph d) are met or exceeded, the timing of implementation of such measures, and monitoring of the effectiveness of such measures;</p> <p>g) criteria to determine when turbidity monitoring may be reduced and/or is no longer required;</p> <p>h) a requirement that all monitoring data and mitigation implementation be documented, retained, and provided to the EAO Compliance and Enforcement and Aboriginal Groups upon request; and</p> <p>i) a requirement that the Holder invite, and if the Aboriginal Groups' monitor is available, arrange for, Aboriginal Groups' monitors to be present during transmission line construction and maintenance activities at all locations where the site-specific erosion and sediment control prescriptions have been developed.</p> <p>The Holder must provide the draft plan that was developed in consultation with ENV, FLNRORD, and Aboriginal Groups to the EAO, ENV, FLNRORD, and Aboriginal Groups a minimum of 90 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The Holder must not commence Construction of the transmission line until the plan has been approved by the EAO, unless otherwise authorized by the EAO.</p> <p>The plan and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction and during maintenance of the transmission line, and to the satisfaction of the EAO.</p>	<p>EAO provided a letter to BW Gold on January 27, 2023 informing BW Gold that the November 29<sup>th</sup> version of the plan is not approved with direction to revise the plan in response to comments from Aboriginal groups and the EAO, provided to BW Gold by February 6, 2023 and resubmit to the EAO for approval prior to the commencement of the Construction of the TL.</p> <p>BW Gold revised the plan based on direction from EAO and resubmitted the revised plan June 6, 2023. EAO issued a letter of approval to BW Gold for the revised C29 plan on June 16, 2023. The implementation of this plan started in December 2024 with TL clearing.</p> <p>It is noted that in the RoW the ground still has the organic layer intact over most of the area which in itself reduces the risk of erosion and sedimentation.</p> <p>BW Gold engaged a Certified Professional in Erosion and Sediment Control (CPESC) through Triton to oversee the management of the TL Sedimentation Monitoring Plan. In May, the Qualified Professional (QP) completed a risk assessment identifying all of the environmentally sensitive areas (ESAs) along the TL and developed an erosion and sediment control (ESC) Tracker. The ESC tracker identified Low Risk, Medium Risk, and High Risk sites. High risk sites include areas in proximity to ESAs (roads, pads, exposed slopes, etc.) or areas that could lead to an ESA and the Triton QP focused ESC efforts in those high risk areas. It was decided that low and medium risk sites would be completed during final reclamation in 2025 as there is no receiving bodies in those areas.</p> <p>Throughout 2024, regular ESC inspections were conducted along the TL; specifically, weekly monitoring of ESC structures during open water season, as well as, following a significant rain event. ESC mitigations and measures were installed and maintained by a labour crew under the direction of the QP.</p> <p>Water quality monitoring was conducted in streams when work was occurring in the vicinity of them. Water quality monitoring also included the Yinka Dene Water Law (YDWL) Class 1 – 3 sites identified as significant to the various Nations.</p> <p>As a part of the Cultural Monitoring commitment, an archeologist or cultural monitor and Environmental Manager (EM) was present during ground disturbance activities in identified culturally sensitive areas.</p> <p>In October 2024, the Triton QEP developed a winter stabilization plan (WSP). The P1 and P2 items in the WSP were completed to the satisfaction of the QP and ensure the protection of Class 1 and fish-bearing streams during freshet 2025.</p>	Ongoing	IC	N/A
<p>EAC Condition 30</p> <p><b>Aquatic Effects Monitoring Plan</b></p>	<p>The Holder must retain a Qualified Professional to develop an Aquatic Effects Monitoring Plan (AEMP). The AEMP must be developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups. The AEMP must include at least the following:</p> <p>a) a description of how the plan takes into consideration the YDWL and any other Aboriginal water policies made available to the Holder by the Aboriginal Groups;</p> <p>b) a description of the Project, associated activities, and study area;</p> <p>c) a conceptual model that describes the relationships between mining-related activities and potential effects on the aquatic environment;</p> <p>d) a description of the water quality issues and concerns with respect to the Project that exist in the vicinity of the Project Site;</p> <p>e) the objectives and a list of water chemistry, surface water toxicity, sediment chemistry, sediment toxicity, tissue chemistry, aquatic plant communities, aquatic invertebrate communities, fish communities, and aquatic-dependent wildlife communities;</p> <p>h) the means by which the data collected under the AEMP will be analyzed to determine the effects of the Project on the aquatic environment;</p> <p>i) means by which the AEMP will inform the Country Foods Monitoring Plan (Condition 41);</p> <p>j) a list of reports that will be prepared to disseminate the results of the AEMP, including a description of the proposed frequency, timing, structure, and content of each report. The reports must include a report that summarizes the results of the AEMP in language understandable to a lay audience; and</p> <p>k) the process and timing for sharing monitoring and study results, including the reports required under paragraph (j), with ENV, EMPR, FLNRORD, Aboriginal Groups and the EMC.</p> <p>The adaptive management aspect of this plan, as required under Condition 3, may be in a stand-alone section of this plan.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups to EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The AEMP, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, Closure and Post-Closure and to the satisfaction of the EAO questions the AEMP is intended to answer; f) a detailed description of the design of the monitoring program, including a list of assessment endpoints (for example, survival, growth, and reproduction of fish in receiving waters) and measurement endpoints (for example, surface water chemistry) that will be incorporated into the AEMP; g) a description of the locations, timing, and frequency of sampling for each of the measurement endpoints and metrics (e.g., concentrations of major ions in surface water) that will be included in the AEMP, including those for surface water chemistry, surface water toxicity, sediment chemistry, sediment toxicity, tissue chemistry, aquatic plant communities, aquatic invertebrate communities, fish communities, and aquatic-dependent wildlife communities;</p> <p>h) the means by which the data collected under the AEMP will be analyzed to determine the effects of the Project on the aquatic environment;</p> <p>i) means by which the AEMP will inform the Country Foods Monitoring Plan (Condition 41);</p> <p>j) a list of reports that will be prepared to disseminate the results of the AEMP, including a description of the proposed frequency, timing, structure, and content of each report. The reports must include a report that summarizes the results of the AEMP in language understandable to a lay audience; and</p> <p>k) the process and timing for sharing monitoring and study results, including the reports required under paragraph (j), with ENV, EMPR, FLNRORD, Aboriginal Groups and the EMC.</p> <p>The adaptive management aspect of this plan, as required under Condition 3, may be in a stand-alone section of this plan.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups to EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The AEMP, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, Closure and Post-Closure and to the satisfaction of the EAO.</p>	<p>On February 18 2022 EAO provided BW Gold with a letter approving the AEMP. The approval states '<i>BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan</i>'.</p> <p>In 2024, the AEMP was implemented successfully with the exception of locations and strictly timed programs that were impacted by wildfire. The 2024 summary of implementation will be included as part of Appendix C30 to be provided by March 31, 2025.</p> <p>Version 2 of the AEMP (AEMP V2) was submitted to ENV on April 30, 2024 (per condition 4.6.6 of PE-110652) for approval (per condition 4.6.1 of PE-110652). AEMP V2 incorporated comments from ENV and Aboriginal groups on AEMP V1. Engagement with ENV and Aboriginal groups continued throughout H2 2024 on AEMP V2. On September 17, 2024, ENV required the submission of AEMP V3 by December 6, 2024.</p>	Ongoing	IC	C30
<p>EAC Condition 31</p> <p><b>Tatelkuz Lake Protection Plan</b></p>	<p>The Holder must retain a Qualified Professional to develop a Tatelkuz Lake Protection Plan. The plan must be developed in consultation with EMPR, ENV, FLNRORD, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) when developing proposed water withdrawals for Tatelkuz Lake, the means by which the Holder will take into consideration that withdrawing water from Tatelkuz Lake to supplement flows for fish and fish habitat in Davidson Creek can have a negative effect on fish and fish habitat in Chedakuz Creek;</p>	<p>This plan will be drafted by QPs. The current Document Submission Plan (DSP v.7.0) reflects this plan being submitted '90 days prior to pumping water from Tatelkuz Lake'.</p>	To be initiated	FP	N/A

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
	<p>b) the means by which the Holder will monitor and mitigate the effects of lake level drawdown on fish and fish habitat in the littoral zone, including habitat required to maintain and protect fish eggs;</p> <p>c) how winter withdrawals of water will be managed to avoid creating unsafe ice conditions on Tatelkuz Lake;</p> <p>d) the means by which the Holder will annually canvass Aboriginal Groups to determine which Aboriginal Groups would like information related to Tatelkuz Lake water levels and safety regarding the use of the lake when the lake is ice covered; and</p> <p>e) for any Aboriginal Group who identifies an interest in ice safety information as per paragraph d), provide a report on effects on ice safety on Tatelkuz Lake and offer to hold a winter ice safety event. The report and safety event must be within 45 days of receiving expressions of interest from Aboriginal Groups, unless otherwise authorized by the EAO.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD and Aboriginal Groups to the EAO, EMPR, ENV, FLNRORD, and Aboriginal Groups for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations and Closure and to the satisfaction of the EAO.</p>				
<p>EAC Condition 32</p> <p><b>Cyanide Management Plan</b></p>	<p>The Holder must develop a Cyanide Management Plan in consultation with EMPR, ENV, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) a description of how the plan is consistent with the Principles and Standards of Practice in the International Cyanide Management Code for the Manufacture, Transport, and Use of Cyanide In the Production of Gold (the International Cyanide Management Code, December 2016, or as updated or replaced from time to time);</p> <p>b) means by which cyanide-containing effluent will be monitored and treated prior to discharge, including discharge to the TSF;</p> <p>c) identification of cyanide concentrations that would trigger the need for additional effluent treatment; and</p> <p>d) management strategies to ensure that hydrogen cyanide gas stays below applicable human health thresholds.</p> <p>The Holder must provide the draft plan that was developed in consultation with ENV, EMPR, and Aboriginal Groups to EAO, ENV, EMPR, and Aboriginal Groups for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate. The plan, and any amendments thereto, must be implemented throughout Construction and Operations and to the satisfaction of the EAO.</p>	<p>On February 18 2022 EAO provided BW Gold with a letter approving the Cyanide Management Plan (CMP). The approval states 'BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan'.</p> <p>In Q4 2024 cyanide was brought on site and remained in storage in preparation for mill commissioning. Training on cyanide was provided to all staff and contractors to support awareness of the product per the CMP.</p>	Ongoing	IC	N/A
<p>EAC Condition 33</p> <p><b>Mine Waste and Water Management Plan</b></p>	<p>The Holder must retain one or more Qualified Professionals to develop a Mine Waste and Water Management Plan. The goal of the plan is to manage mine waste and water in a manner that is protective of the receiving environment. The plan must be developed in consultation with Aboriginal Groups, ENV and EMPR. The plan must include at least the following:</p> <p>a) the means by which the Holder will implement an oxygen-preventing barrier to cover waste rock, tailings and other mine by-products to prevent adverse effects from rock that is currently or potentially acid-generating or ML. The barrier may include coverage with additional tailings, water, or another mitigation measure that will be effective at limiting the potential for ML/ARD, as determined by the Qualified Professional(s);</p> <p>b) the means by which the Holder will limit the year-over-year accumulation of water stored in TSF that exceeds the amount necessary to:</p> <p>i) address water needed under paragraph a); and</p> <p>ii) meet the needs for the operation of the mill.</p> <p>This determination must be made by a Qualified Professional(s), taking into account safety and concerns expressed by Aboriginal Groups. The plan must identify whether treatment and discharge of water from the TSF during Operations was considered and if not, provide a rationale;</p> <p>c) the means by which the Holder will monitor and document the year-over-year water accumulation in the TSF;</p> <p>d) the management of ML/ARD from low grade ore stored on land during Operations, which must include placement of the ore on a low permeability foundation and collection, monitoring, and treatment of low grade ore contact water;</p> <p>e) a requirement that any remaining low-grade ore stockpile be backfilled into the pit or TSF at the end of Operations;</p> <p>f) identification of water treatment technology or technologies proposed to be used during Operations to treat pit water for discharge; and</p> <p>g) if any water treatment technology proposed for use during Operations differs from that proposed in the memo submitted as part of the Application (Document: Appendix F: Preliminary Design of Pit Sump and Pit Perimeter Dewatering Well Network Water Treatment Plan for the Blackwater Gold Project in Blackwater Gold Project: Updated Surface Water Quality Model Report (Aug 2016). Prepared by ERM), an assessment of how the new proposed technology achieves the same or better results as the technology proposed in the Application.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV and Aboriginal Groups to EMPR, ENV, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan must be updated at least every five years from the planned commencement of Construction, unless otherwise authorized by the EAO.</p> <p>The plan and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction and Operations, and to the satisfaction of the EAO.</p>	<p>On December 22nd, 2002, BW Gold received a letter from EAO approving the C33 Mine Waste and Water Management Plan.</p> <p>BW Gold did not generate tailings in 2024, and no LGO was produced. Initial placement of potentially acid generating (PAG) in the TSF occurred in November 2024. As required by M-246 this material will be covered with water or tailings slurry within 12 months.</p>	Ongoing	IC	N/A
<p>EAC Condition 34</p> <p><b>Closure and Post-Closure Water Quality Management Plan</b></p>	<p>The Holder must retain a Qualified Professional to develop a plan for water quality management during Closure and Post-Closure. The plan must be developed in consultation with EMPR, ENV, and Aboriginal Groups.</p> <p>The plan must include at least the following:</p> <p>a) continuation of mitigation measures identified in paragraphs a) and b) i) of Condition 33 (Mine Waste and Water Management Plan);</p> <p>b) identification of the proposed water treatment technology for use at Closure and Post-Closure, including:</p> <p>i) whether and how the water treatment technology differs from the technology proposed in the Application (Document: February 15, 2017 Blackwater Gold Project: Water Treatment Responses for Comments 1266, 1270, 1271, 1272, and 1273);</p> <p>ii) an assessment and identification of the timing for when the treatment is expected to be required, including identification of the factors considered in the assessment;</p> <p>iii) identification and description of any new information available on the water treatment technology referred to in paragraph b) i) that could affect the conclusions in the environmental assessment on the effectiveness of the treatment or the confidence in the treatment being effective;</p> <p>iv) if information in paragraph b) iii) indicates the water treatment technology will have a lower level of confidence or be less effective than identified in the Application, identification of the additional mitigation measures that will be applied; and</p> <p>v) if new or changed water treatment technology is proposed in Closure or Post-Closure:</p> <p>i. demonstration that the water treatment technology can achieve downstream water quality required by Condition 26 (Water Quality Management); and</p> <p>ii. demonstration that the technology is technically feasible;</p> <p>c) description of how any water treatment by-products will be managed;</p> <p>d) the means by which the Holder will actively fill the pit with water in Closure to address ML/ARD;</p> <p>e) description of any additional monitoring, mitigation and/or management measures, additional to water treatment, needed to support the effectiveness of water treatment or achieving the water quality required by Condition 26, Water Quality Management, such as methods for maintaining adequate water quality in the pit lake; and</p> <p>f) identification of mitigation measures to limit seepage from TSF C from entering the TSF pond D such that seepage does not cause the quality of water discharged from TSF pond D to the receiving environment to exceed limits required by Condition 26 (Water Quality Management).</p> <p>The Holder must provide the this draft plan that was developed in consultation with EMPR, ENV, and Aboriginal Groups to EMPR, ENV, Aboriginal Groups and the EAO for review at the time of the Holder's planned commencement of Operations. The plan must be updated at least every five years from the commencement of Operations. The Holder may change the frequency of the plan updates, if authorized by the EAO.</p> <p>The plan, and any updates and amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Operations, Closure and Post-Closure, and to the satisfaction of the EAO.</p>	<p>The Closure and Post-Closure Water Quality Management Plan is also required by the Mines Act Permit M-246 and EMA permit 110652. This Plan was developed and submitted to EAO, EMLI, ENV, and Aboriginal groups on September 6, 2024. Comments from EAO, EMLI, ENV, and Aboriginal Groups were received, with EAO requiring that the plan be updated based on their direction by November 8th, 2025.</p>	Ongoing	IC	N/A
<p>EAC Condition 35</p>	<p>The Holder develop a Tailings Dam Safety Transparency Plan. The plan must be developed in consultation with EMPR, ENV, and Aboriginal Groups. The plan must include at least the following:</p>	<p>On February 2, 2024 BW Gold initiated consultation on the Tailings Dam Safety Transparency Plan (TDSTP) with EMLI, ENV, and Aboriginal Groups. Following this, the TDSTP was submitted for EAO approval on March 20,</p>	Ongoing	IC	N/A

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
<b>Tailings Dam Safety Transparency Plan</b>	<p>a) the identification and description of all types of reports, reviews, inspections and meetings pertaining to tailings dam safety that are produced, undertaken or held by the Holder;</p> <p>b) the frequency and anticipated timing for the materials and activities identified in paragraph a);</p> <p>c) how and when the information in paragraph a) will be provided to Aboriginal Groups in a timely manner;</p> <p>d) a description of how the Holder will invite the Aboriginal Groups' monitors identified in Condition 17 and other Aboriginal Group representatives to be included in the Holder's meetings and site inspections pertaining to tailings dam safety; d) the provision of an annual report, developed by a Qualified Professional, to the EAO, ENV, EMPR and Aboriginal Groups on dam safety, including changes to the status of the tailings dam and the status of ongoing investigations or actions being taken to address any safety issues. The report must include a summary written for a lay audience; and</p> <p>e) the provision of and timing for offering an annual dam safety meeting with Aboriginal Groups and EMPR.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, and Aboriginal Groups to EMPR, ENV, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Schedule required by Condition 10 of this Certificate.</p> <p>The plan, and any amendments thereto, must be implemented by a Qualified Professional throughout Construction, Operations, Closure, Post-Closure, and following Post-Closure, or as otherwise authorized by the EAO, and to the satisfaction of the EAO.</p>	<p>2024. However, on April 2 EAO identified that additional consultation with Aboriginal Groups was needed. Conversations with those groups continued, and an updated version of the TDSTP was submitted for EAO approval on July 19, 2024. EAO reviewed the plan and through a letter dated October 4, 2024 required that additional information be added for clarity, the required changes were made and the plan was updated accordingly. Final submission to EAO occurred on December 30, 2024, and the plan was approved for implementation on January 27, 2025.</p>			
<p>EAC Condition 36</p> <p><b>Accidents and Malfunctions Administration &amp; Communication Plan</b></p>	<p>Accidents and Malfunctions Administration and Communication Plan The Holder must retain one or more Qualified Professionals or Qualified Persons to develop a Accidents and Malfunctions Administration and Communication Plan for the Project. The plan must be developed in consultation with FLNRORD, EMPR, ENV, NHA, and Aboriginal Groups. The plan must include at least the following:</p> <p>a) the means by which the Holder will acquire and maintain contact information for Aboriginal Groups, Tatelkus Indian Reserve 28, other nearby residents, local communities or other users of the area who could be affected by an accident or malfunction</p> <p>b) the types of accidents and malfunctions requiring notification by the Holder and the timeframe of notifications (including updates subsequent to the initial notification) to those identified in paragraph a);</p> <p>c) information to be included in the notifications required by paragraph b), including but not limited to:</p> <ul style="list-style-type: none"> <li>i) information on the accident or malfunction, including types and quantities of substances released, location of releases, duration of releases, and potential impacts caused by the release;</li> <li>ii) any health advisories;</li> <li>iii) remedial action being taken by the Holder including measures to avoid similar occurrences; and</li> <li>iv) details of subsequent monitoring related to the accident of malfunction;</li> </ul> <p>d) the manner by which those identified in paragraph a) will be notified by the Holder of an accident or malfunction;</p> <p>e) process for identifying and providing opportunities for those identified in paragraph a) to assist in response to the accident or malfunction;</p> <p>f) identification of any types of accidents and malfunctions that are not addressed in other plans, programs or other documents required by this Certificate or in provincial requirements for the Project, and mitigation measures to address potential adverse effects arising from those accidents or malfunctions; and</p> <p>g) requirements for the Holder to manage the risk of, monitor and report on Project Vehicle-related accidents, including but not limited to identifying:</p> <ul style="list-style-type: none"> <li>i) response measures for fires or explosions involving Project Vehicles;</li> <li>ii) safety measures to be followed by drivers of Project Vehicles; and</li> <li>iii) safety and emergency response equipment to be incorporated into Project Vehicles.</li> </ul> <p>The Holder must provide this draft plan that was developed in consultation with EMPR, NHA, ENV, FLNRORD, and Aboriginal Groups to FLNRORD, EMPR, ENV, NHA, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Schedule required by Condition 10 of this Certificate.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, Closure and Post-Closure, and to the satisfaction of the EAO.</p>	<p>On February 18, 2022 EAO provided BW Gold with a letter approving the Accidents and Malfunctions Administration &amp; Communication Plan (AMCMP). The approval states '<i>BW Gold may proceed to implement the following plans and revise in consultation with the parties listed in Schedule B of the EAC (Table of Conditions) for each condition and in accordance with timelines in the Document Submission Plan</i>'.</p> <p>The AMCMP was implemented in 2024, with three events triggering the external reporting requirement. Information on this event will be available in the 2024 annual report. The report for this event is included in appendix C36.</p>	Ongoing	IC	C36
<p>EAC Condition 37</p> <p><b>Community Liaison Committee and Community Effects Monitoring and Management Plan</b></p>	<p>The Holder must establish and maintain a Community Liaison Committee (CLC). The purpose of the CLC is to provide information to the Holder on effects from the Project in the members' communities, to provide advice to the Holder on mitigation measures to address social and economic effects, and review and comment on the CEMMP and the plan's implementation.</p> <p>a) The Holder must develop a Terms of Reference for the CLC in consultation with the District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, NHA and the EAO. The Terms of Reference must include at least the following:</p> <ul style="list-style-type: none"> <li>i) the communities or organizations that will be invited to be members of the CLC. This must include at least the following: District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, and NHA;</li> <li>ii) the mechanisms by which the Holder will facilitate the effective participation of CLC members;</li> <li>iii) the frequency with which the CLC will be canvassed for agenda topics and the means by which the Holder will provide responses to CLC members on those proposed topics;</li> <li>iv) the frequency of meetings and the means by which the locations of meetings will be selected;</li> <li>v) the means by which CLC members will be advised of the timing of and topics for proposed meetings;</li> <li>vi) the means by which meeting records will be kept and meeting notes made publicly available;</li> <li>vii) the means by which other agencies or organizations whose mandates pertain to the topics potentially discussed by the CLC will be identified and invited to join discussions on those topics;</li> <li>viii) the means by which the CLC will coordinate with the EMC (Condition 19) where similar or related topics are being considered;</li> <li>ix) the means by which the Holder will provide and document responses to issues raised at the CLC;</li> <li>x) the means by which the CLC will be asked to periodically review the implementation of the CEMMP; and</li> <li>xi) an approach to periodically evaluate the effectiveness of the CLC;</li> </ul> <p>b) The Holder must retain one or more Qualified Persons to develop a CEMMP. The Qualified Persons must each have a minimum of five years' relevant experience in the assessment and management of the social effects identified associated with major mines or industrial facilities. The CEMMP must include at least the following:</p> <ul style="list-style-type: none"> <li>i) identification of the communities likely to experience social or economic effects that are to be addressed in the plan;</li> <li>ii) the means by which additional communities would be identified and included in the plan should effects from the Project extend to other communities in the future;</li> <li>iii) a monitoring program for the following potential adverse effects from the Project on the communities identified in paragraphs b) i) and b) ii) related to: <ul style="list-style-type: none"> <li>i. impacts on community services;</li> <li>ii. impacts on population and demographics;</li> <li>iii. impacts on crime and socially disruptive behaviour; and</li> <li>iv. impacts on community and family well-being;</li> </ul> </li> <li>iv) means by which the Holder will assess and mitigate potential adverse effects from the Project on Aboriginal Groups and sub-populations who may be more vulnerable to Project related adverse social impacts;</li> <li>v) provision of housing for all Employees at camps at the Project Site during Construction and Operations while on shift;</li> <li>vi) provision of transportation for Employees to the Project Site by bus during Operations and bus and airplane to the Project Site during Construction and the means by which the Holder will restrict Employees from driving personal vehicles to the Project Site, except under limited and identified circumstances;</li> <li>vii) measures to facilitate hiring of Employees and service providers from the Socio-economic Regional Study Area defined in the Application and from Aboriginal Groups. These measures must include: <ul style="list-style-type: none"> <li>i. skills training; and</li> <li>ii. recruitment approaches to facilitate hiring of members of Aboriginal Groups and population groups who are typically under-represented in mine employment;</li> </ul> </li> <li>viii) measures to support Employees maintaining regular contact with their social networks while residing at the camps;</li> <li>ix) measures to support Employees in managing personal finances and mental and physical health;</li> <li>x) management of traffic along the Kluskus and Kluskus-Ootsa Forest Service Road, including how the Holder will seek and respond to concerns about road traffic from local communities and other road users;</li> <li>xi) means by which the Holder will reduce the effects on Employees and local communities when Operations cease on a temporary or permanent basis;</li> <li>xii) means by which the Holder will provide information to Aboriginal Groups, land users and tenure holders on the potential impact of Project activities on their use and enjoyment of an area affected by the Project and consider and address concerns raised by those individuals; and</li> </ul>	<p><b>Meetings:</b></p> <p>In 2024, the Community Liaison Committee (CLC) met 4 times.</p> <ul style="list-style-type: none"> <li>- February 7, 2024 - CLC meeting <ul style="list-style-type: none"> <li>o CLC solicited for new co-chair nominations</li> <li>o Artemis and Community appointed a new co-chair</li> <li>o Terms of Reference Effectiveness Survey completed</li> </ul> </li> <li>- May 1, 2024 - CLC meeting <ul style="list-style-type: none"> <li>o ToR Effective Survey results presented to CLC</li> </ul> </li> <li>- September 11, 2024 - CLC meeting</li> <li>- November 6, 2024 - CLC meeting</li> </ul> <p><b>Other activities:</b></p> <p>Through 2024 the CLC was notified of any new members that an organization replaced (i.e. due to retirement, new hires etc). CLC members are part of Artemis's e-distribution list so receive new releases, project updates, career postings, and newsletters.</p> <p>On July 16, 2024 the Community Effects Monitoring and Management Plan (CEMMP) report for Early Works was sent to CLC for review. This report was finalized on September 11, 2024.</p> <p><b>Upcoming:</b></p> <p>Construction Report for the CEMMP is underway.</p>	Ongoing	IC	N/A

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
	<p>xiii) the process by which members of the public may submit feedback regarding the Project and the resolution process for any complaints received about the Project, including the timeframe and means by which the Holder will respond to the complaint, and how issues will be identified, tracked and responses documented.</p> <p>The Holder must provide the draft CLC terms of reference that was developed in consultation with the District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, NHA and the EAO to the EAO and proposed CLC members a minimum of 180 days prior to the planned commencement of Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The Holder must provide the draft CEMMP that was developed in consultation with the CLC to the EAO and CLC members a minimum of 60 days prior to the planned commencement of Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan and terms of reference, and any amendments thereto, must be implemented to the satisfaction of a Qualified Person throughout Construction, Operations, and for the first five years of Closure, and to the satisfaction of the EAO.</p> <p>The Holder must retain a Qualified Person with at least five years' experience related managing and mitigating potential conflicts between tenure holders in BC, to develop a plan to address potential adverse effects of the Project on the business conducted under guide outfitter licence #601039. The plan must be developed in consultation with FLNRORD and the holder of the guide outfitter licence #601039 (Licence Holder). The plan must include at least the following: a) mitigation measures to address potential for adverse effects to the Licence Holder's operations, including but not limited to: i) using noise abatement measures and consideration of scheduling Project activities to limit disruption to the guiding operations; ii) providing the construction schedule to the Licence Holder 30 days prior to the planned commencement of Construction; b) an analysis of how the consultation with the Licence Holder and mitigation and accommodation measures in the plan are consistent with BC's A Practical Guide to Effective Coordination of Resource Tenures (2008, or as updated or replaced from time to time); c) a detailed description of the consultation undertaken with the Licence Holder regarding the mitigation measures in paragraph a) and analysis in paragraph b), including a report on concerns raised by the Licence Holder and the Holder's response to those concerns; and d) the means by which the Holder will monitor and report on the effectiveness of the mitigations referred to in paragraph a).</p> <p>The Holder must provide the draft plan that was developed in consultation with FLNRORD and the Licence Holder to the EAO and FLNRORD a minimum of 90 days prior to the planned commencement of Construction, unless otherwise listed in the Document Submission Plan required by Condition 10 of this Certificate. The Holder must not commence Construction until the plan and the report have been approved by the EAO, unless otherwise authorized by the EAO.</p> <p>The plan and any amendments thereto, must be implemented to the satisfaction of a Qualified Person throughout Construction and Operations and to the satisfaction of the EAO</p>	<p>BW Gold will continue to seek to receive information and engage with the Tenure Holder both individually and through the Access Management Working Group, as it remains relevant to the Tenure Holder's interests.</p> <p>BW Gold continues to utilize the principles associated with the Practical Guide as an overarching reference. Without written reciprocal engagement from the Tenure Holder or documentation from the MOF, BW Gold believes the Tenure Holder has made the business decision to no longer operate hunts in Guide Territory Certificate (GTC) 601039 area.</p> <ul style="list-style-type: none"> <li>The Tenure Holder indicated in an email on November 7th 2023 and WLRS confirmed on March 25, 2024 that the regulators have again given the Tenure Holder non-use permission GTC 601039 from April 1st, 2023 to March 31 of 2024.</li> <li>The Fish and Wildlife Head for WLRS indicated by phone/email on January 24, 2025 that the regional manager had granted non-use permission to the Tenure Holder on GTC 601039 from April 1, 2024, to March 31, 2025.</li> </ul> <p>Provided Tenure Holder Communication and Mitigation Plan (THCMP) Annual Report on March 28, 2024 as well as changes made to Appendix D of the THCMP as per recommendations made in the Annual Report. Comments were exchanged by Artemis, the QP, the Tenure Holder, and WLRS regarding the Annual Report.</p> <p>Notifications have been sent to the Tenure Holder regarding field monitoring activities related to fisheries compliance, helicopter waterbird surveys, stream monitoring, and other field activities.</p> <p>Notifications of TL Construction activities sent in May (pole foundations) and June (stringing lines with helicopter).</p> <p>Notification of on site blasting sent in November, 2024.</p> <p>Provided an update of scheduled activities for Blackwater Mine in January, July, and October.</p>	Ongoing	IC	N/A
<p>EAC Condition 39</p> <p><b>Final Transmission Line Routing Plan</b></p>	<p>The Holder must develop a Final Transmission Line Routing Plan (FTLRP) in consultation with ENV, FLNRORD, and Aboriginal Groups. The plan must be developed in two phases.</p> <p>Phase 1 of the FTLRP must include at least the following: a) the means by which the Holder will consult with FLNRORD, Aboriginal Groups, existing tenure holders, permit holders, property owners, recreationalists, and other land users potentially affected by the transmission line routing options on the potential effects of the transmission line to those parties, including the means by which the Holder will identify the appropriate parties to be consulted; b) the mitigation measures to address potential impacts from the transmission line that will be proposed to the parties identified in paragraph a); and c) the means by which the Holder will notify the EAO, Aboriginal Groups and parties identified in paragraph a) of the final route selection.</p> <p>Phase 2 of the FTLRP must include at least the following: d) a report on the results of the consultation in paragraph a), which must include at least the following: i) how the consultation influenced the selection of the final route; ii) identification of the final route selection, including mapping at the same scale(s) as in Schedule A of this Certificate; iii) the extent to which mitigation measures address the potential effects; and iv) any changes made to mitigation measures to address concerns identified through the consultation in paragraph a). e) the means by which the mitigation measures for the valued component Visual Resources and Non-Traditional Land Use in the in the Mitigations Table required under Condition 43 will be implemented with respect to the full route of the transmission line, including the final routing option selected; f) the means by which the Holder will avoid impacts to recreational sites or to the use of recreation sites. Where the Holder is of the view that avoidance is not possible, the Holder must provide a rationale for why that is the case, and describe the mitigation measures that will be taken to limit the effects on recreation sites or their use; g) the specific mitigation measures developed to address issues identified in paragraph d); and h) with respect to the Stellako River Wildlife Management Area (SRWMA): i) how the mitigation measures have taken into consideration BC EMP in identifying the effects to the SRWMA and the means to avoid, minimize, restore on site, and offset impacts to the SRWMA; and ii) how the Holder has addressed any comments received by the FLNRORD Regional Manager responsible for the SRWMA.</p> <p>The Holder must provide the draft Phase 1 plan that was developed in consultation with ENV, FLNRORD and Aboriginal Groups to the EAO, ENV, FLNRORD, and Aboriginal Groups a minimum of one year prior to the planned commencement of Construction of the transmission line, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The Holder must provide the draft Phase 2 plan that was developed in consultation with ENV, FLNRORD and Aboriginal Groups to the EAO, ENV, FLNRORD and Aboriginal Groups a minimum of 90 days prior to the planned commencement of Construction of the transmission line, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The Holder must not commence Construction of the transmission line until Phase 2 of the plan has been approved by the EAO, unless otherwise authorized by the EAO.</p> <p>The plan (both phases) and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, and Closure, and to the satisfaction of the EAO.</p>	<p>The 2021 version of the FTLRP was reviewed by all required parties per the EAC and comments were provided. Meetings were held throughout 2022 and the FTLRP was re-submitted December 16, 2022 to EAO and Aboriginal groups for review.</p> <p>BW Gold received a letter from EAO on March 2, 2023 approving the plan.</p> <p>Pole locations along the TL were optimized based on feedback received from Aboriginal groups, as well as other stakeholders, and engineering refinements. The TL route did not change based on this process.</p> <p>These changes reduced the number of poles from 759 to 611, resulting in less visual impact, and decreasing ground and wetland disturbance through the need for less access construction.</p> <p>An overview of these changes was presented at the February 15, 2024 ELoMC meeting, while a kmz file and updates figures were provided on February 23, 2024.</p>	Ongoing	IC	N/A
<p>EAC Condition 40</p> <p><b>Health and Medical Services Plan</b></p>	<p>The Holder must retain a Qualified Person with a minimum of five years' experience in the planning and delivery of health care services in remote communities, unless otherwise authorized by the EAO, to develop a Health and Medical Services Plan. The plan must be developed in consultation with NHA, Aboriginal Groups, the District of Vanderhoof and the Village of Fraser Lake. The plan must include at least the following: a) identification of how the guidance from "Health and Medical Services Plan Best Management Guide for Industrial Camps" (Northern Health Authority, March 2015, or as updated or replaced from time to time) has been incorporated into the Health and Medical Services Plan and a rationale for any guidance from this document not incorporated; b) how the Holder will monitor drinking water quality at the Construction and Operations camps, including frequency of the monitoring, and the mitigation measures that will be applied if the monitoring results indicate exceedances of current BC Drinking Water Quality Guidelines; c) a description of the following: i) on-site health, and medical protocol and services to be implemented to meet the workforce's urgent and non-urgent health care needs; ii) disease and infection prevention and outbreak protocols; and</p>	<p>The plan, developed in consultation with Northern Health Authority (NHA), Aboriginal Groups, the District of Vanderhoof and the Village of Fraser Lake, was submitted December 21, 2021, a minimum of 60 days prior to the start of construction.</p> <p>On August 31st, 2022 BW Gold received a letter from EAO approving implementation of the Health and Medical Services Plan (HMSP).</p> <p>Implementation of the HMSP continued in 2024 with the following updates:</p> <ul style="list-style-type: none"> <li>Operations camp and facilities were commissioned with single rooms and private bathrooms, new dining hall, games room, exercise rooms and after-hours cultural activities program included.</li> <li>Mental health counseling professional onsite.</li> <li>HMSP will be updated in 2025</li> </ul>	Ongoing	IC	N/A

EAC Condition #	Condition	Activity to Fulfill Condition Requirement	Condition status:	Holder's Assessment of Compliance Status:	Appendix
	<p>iii) health promotion, and worker wellness program information (including but not limited to physical infrastructure, amenities and activities that are supportive of physical and mental health);</p> <p>d) description of a process for communication, coordination, and collaboration with the NHA, BC Ambulance Service and local health service providers on matters including, but not limited to patient care/transfer, data collection and reporting;</p> <p>e) description of how the Holder will monitor and report on the effectiveness of the plan; and</p> <p>f) description of how this plan relates and informs the plan required by the CEMMP in Condition 37.</p> <p>The Holder must provide this draft plan that was developed in consultation with NHA, Aboriginal Groups, the District of Vanderhoof, and the Village of Fraser Lake to NHA, Aboriginal Groups, the District of Vanderhoof, and the Village of Fraser Lake and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate. The plan, and any amendments thereto, must be implemented throughout Construction and Operations to the satisfaction of a Qualified Person and to the satisfaction of the EAO.</p>				
<p>EAC Condition 41</p> <p><b>Country Foods Monitoring Plan</b></p>	<p>The Holder must retain one or more Qualified Professionals to develop a Country Foods Monitoring Plan. The plan must be developed in consultation with EMPR, ENV, NHA, and the Aboriginal Groups.</p> <p>The plan must include at least the following:</p> <p>a) identification of all COPCs and related human health thresholds and triggers based on based on human health guidelines, as identified by a Qualified Professional;</p> <p>b) the means by which the Qualified Professional will work with the Aboriginal Groups to identify the specific country foods to be sampled through this plan;</p> <p>c) the means by which any sampling required by other plans required under this Certificate can also be used to inform the requirements of this plan;</p> <p>d) methods and locations for sampling COPCs, including quality assurance, quality control measures and sampling frequency. Unless addressed through sampling undertaken through other plans as identified in paragraph c), sampling methods must include at least the following:</p> <p>i) detection limits that are sufficient to compare to human health thresholds and triggers outlined in paragraph a);</p> <p>ii) reference sites that are not impacted by the Project;</p> <p>iii) air quality sampling and monitoring including:</p> <p>i. criteria air contaminants;</p> <p>ii. dustfall, as outlined in Condition 20;</p> <p>iii. meteorological parameters;</p> <p>iv) soil sampling, including:</p> <p>i. co-location of samples with vegetation tissue samples in paragraph d) v);</p> <p>v) vegetation tissue sampling, including:</p> <p>i. co-location of samples with soil in paragraph d) iv);</p> <p>ii. selection of plant species to be sampled in consultation with the Aboriginal Groups;</p> <p>vi) fish tissue sampling, including:</p> <p>i. co-location of samples with water samples in paragraph d) vii);</p> <p>ii. selection of fish species to be sampled in consultation with the Aboriginal Groups;</p> <p>vii) water quality sampling, including:</p> <p>i. parameters that can influence metal uptake;</p> <p>ii. co-location of samples with fish tissue in paragraph d) vi); and</p> <p>viii) small mammal tissue sampling;</p> <p>e) the means by which the Holder will, in consultation with Aboriginal Groups, incorporate specific measures to ensure that the sampling plan is culturally appropriate;</p> <p>f) the analysis that will be undertaken by the Qualified Professional to assess if the information from the sampling indicates potential effects to country foods as a result of the Project;</p> <p>g) how the results of other plans required by this Certificate and any provincial processes applicable to the Project, will inform and be informed by the Country Foods Monitoring Plan;</p> <p>h) process for a Qualified Professional to assess if sufficient sampling has been conducted and whether further long-term monitoring is required, and to what extent. The process must include consultation with EMPR, ENV, NHA, and the Aboriginal Groups;</p> <p>i) the means by which the Holder will communicate the results of the sampling to the EAO, EMPR, ENV, NHA, and the Aboriginal Groups. The process must include how the Holder will canvass and consider concerns about effects to country foods from Aboriginal Groups and set reporting frequency in consideration of those concerns. At a minimum, this must include the production and distribution of an annual report which includes:</p> <p>i) all raw data;</p> <p>ii) interpretation of the collected data, including a discussion of whether the data indicates that any contaminants exceed or exceeded triggers or thresholds identified in paragraph a);</p> <p>iii) all additional mitigation or adaptive management measures undertaken by the Holder in response to information obtained through the implementation of the plan or proposed to be undertaken, including when the measures will be implemented, following submission of the report;</p> <p>iv) any proposed changes to the sampling program; and</p> <p>v) a summary written for a lay audience.</p> <p>The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, NHA and Aboriginal Groups to the EAO, EMPR, ENV, NHA, and Aboriginal Groups a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.</p> <p>The plan and any amendments thereto, must be implemented to the satisfaction of the Qualified Professional throughout Construction, Operations, and Closure, and to the satisfaction of the EAO.</p>	<p>On February 18, 2022 EAO provided BW Gold with a letter approving the Country Foods Management Plan (CFMP).</p> <p>Certain monitoring aspects of the CFMP (i.e. dustfall sampling, small mammal trapping, and vegetation sampling) are scheduled once every 3 years. The most recent sampling occurred in 2023, with the next sampling events planned for 2026. Other monitoring aspects of the CFMP, where data is fed by alternative monitoring programs, was implemented successfully in 2024 (i.e. AEMP tissue metals sampling, water quality monitoring, and air quality monitoring).</p> <p>Additional details on the implementation of the CFMP in 2024 will be presented in the CFMP report to be provided by March 31, 2025.</p>	Ongoing	IC	C41
<p>EAC Condition 42</p> <p><b>Public Communications</b></p>	<p>The Holder must establish a publicly available website dedicated to communicating information about the Project, including but not limited to the following:</p> <p>a) project status;</p> <p>b) current versions of all plans that are or were required to be provided to the EAO in this Certificate, as well as final versions of programs and/or other documents, including final versions of updates to programs and/or other documents, required to be produced by this Certificate;</p> <p>c) a notification system that would allow interested parties to sign-up to be made aware of new website content or updates to the materials listed in paragraph b);</p> <p>d) a summary page that provides easy identification of and access to new content or updates of plans, programs or other documents noted in paragraph c);</p> <p>e) information on any public engagement activities related to the Project; and</p> <p>f) contact information for the Holder.</p> <p>The website must be established a minimum of 45 days prior to the planned commencement of Construction and must be kept up to date throughout Construction, Operations, Closure and Post-Closure and must be implemented to the satisfaction of the EAO.</p>	<p>The website was established and communicated as of January 16, 2022, a minimum of 45 days prior to the planned commencement of Construction.</p> <p>The website was maintained regularly in 2024. It can be accessed at: <a href="https://blackwatergoldmine.com/eac-plans/">https://blackwatergoldmine.com/eac-plans/</a></p>	Complete	IC	N/A
<p>EAC Condition 43</p> <p><b>Mitigations Table Update</b></p>	<p>The Holder must develop a Mitigations Table that captures all mitigation measures identified in the document Blackwater Gold Project: Summary of Proposed Mitigation Measures (November 6, 2018) (November Table) and the document Blackwater Gold Project: Master Mitigation Table September 28, 2018 (September Table) that will be incorporated into plans developed as a requirement of this Certificate with respect to the following valued components: Air Quality; Noise and Vibration; Caribou; Amphibians; Bats; Forest and Grassland Birds; Furbearers; Grizzly Bear; Invertebrates; Moose; Waterbirds; Wetlands; Visual Resources; Non-traditional Land and Resource Use; Ecosystem Composition and Plant species and ecosystems at risk. The mitigations to be considered for inclusion in the Mitigations Table include those listed under the column "Mitigation Measure" in the November Table, and those listed under the columns "Mitigation Measure", "Additional Information" and "Commitments made during Application/EIS Review" in the September Table.</p> <p>The Holder must also develop a report that identifies all mitigation measures in the November Table and September Table that are not included in the Mitigations Table and a clear rationale for why those mitigations are not included.</p> <p>The Mitigations Table and report must be developed in consultation with the EAO, Aboriginal Groups, FLNRORD and ENV.</p> <p>The Holder must provide the draft Mitigations Table and report developed in consultation with the EAO, Aboriginal Groups, FLNRORD and ENV to the EAO, Aboriginal Groups, ENV and FLNRORD no later than 180 days after the issuance of this Certificate, or as otherwise authorized by the EAO.</p> <p>The Holder must not commence Construction until the Mitigations Table and the report have been approved by the EAO, unless otherwise authorized by the EAO.</p>	<p>BW Gold provided the draft Mitigations Table and report developed in consultation with the EAO, Aboriginal Groups, FLNRORD and ENV to the EAO, Aboriginal Groups, ENV and FLNRORD no later than 180 days after the issuance of this Certificate, or as otherwise authorized by the EAO. The report (dated May 17, 2019) can be accessed at <a href="https://projects.eao.gov.bc.ca/api/public/document/5d0d32624d0f33001a9cefa4/download/Blackwater%20-%20Assessment%20Report.pdf">https://projects.eao.gov.bc.ca/api/public/document/5d0d32624d0f33001a9cefa4/download/Blackwater%20-%20Assessment%20Report.pdf</a></p> <p>On August 31st, BW Gold received a letter from EAO approving Condition 40.</p> <p>The mitigation table (used to develop all EAC Management Plans) has been added to the public website and is available here: <a href="https://blackwatergoldmine.com/resources/eac/Blackwater-Mine-Mitigations-Table-Condition-43.pdf?v=0.001">https://blackwatergoldmine.com/resources/eac/Blackwater-Mine-Mitigations-Table-Condition-43.pdf?v=0.001</a></p> <p>There were no revisions or updates made to the approved mitigations table in 2024.</p>	Complete	IC	N/A