ARTEMIS GOLD INC | Blackwater Mine

Blackwater Gold Mine Annual DS Follow-Up Report

January 1, 2024 – December 31, 2024

Executive Summary

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

Major mine components will include a tailings storage facility (TSF), ore processing facilities, waste rock, overburden and soil stockpiles, borrow areas and quarries, water management infrastructure, water treatment plants, accommodation camps and ancillary facilities. Limited early works construction activities to develop these components began in October 2022 and continued through December. Prior to this (January – September), the Project was in the pre-construction phase.

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

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

By the end of 2024, over 95% of construction was complete, supporting the first gold pour in January 2025. Construction during this reporting period occurred with a focus on logging and clearing, soil salvage, road development, establishing temporary water management infrastructure intended to support construction, construction of permanent water management infrastructure intended to support operations, TSF Dam C development and, development of the plant site. This FUP the summarizes the results of those monitoring programs relative to this phase, including a summary of adaptive management and recommendations.

Résumé Exécutif

La Mine Blackwater Gold (la Mine) est une mine à ciel ouvert d'or et d'argent en construction dans le centre de la Colombie-Britannique (C.-B.), à environ 112 kilomètres (km) au sud-ouest de Vanderhoof, 160 km au sudouest de Prince George et 446 km au nord-est de Vancouver. La mine est situé sur les territoires traditionnels de la Nation Lhoosk'uz Dené, de la Première Nation Ulkatcho, de la Nation Skin Tyee et de la Nation Tsilhqot'in. Le chemin forestier (FSR) de Kluskus et Kluskus-Ootsa et la ligne de transmission du projet traversent les territoires traditionnels de la Première Nation Nadleh Whut'en, de la Première Nation Saik'uz et de la Première Nation Stellat'en (collectivement, les Premières Nations du Nechako) ainsi que les territoires traditionnels de la Première Nation Nazko, de la bande Nee-Tahi-Buhn, de la Nation Cheslatta Carrier et de la Première Nation Yekooche.

Les composantes majeures de la mine comprendront une installation de stockage des résidus (TSF), des installations de stations d'épuration, des stocks de stériles, de morts-terrains et de sols, des zones d'emprunt et des carrières, des infrastructures de gestion de l'eau, des usines de traitement des eaux, des camps d'hébergement et des installations auxiliaires. Les premières activités de construction limitées pour développer ces composants ont commencé en Octobre 2022 et se sont poursuivies jusqu'en Décembre. Avant cela (Janvier – Septembre), le projet était en phase de pré-construction.

Le développement de cette opération est facilité par un certain nombre d'approbations, y compris une déclaration de decision fédéral (DS) émise en vertu de la Loi canadienne sur l'évaluation environnementale (2012) en avril 2019. La condition 2.11 de la DS exige l'élaboration d'un rapport annuel sur le programme de suivi (FUP), résumant les activités de suivi et les résultats de surveillance d'un certain nombre de programmes de surveillance clés requis par le DS, notamment:

- Plan de gestion de la qualité de l'air et des poussières diffuses;
- Plan d'atténuation et de surveillance du caribou;
- Programme d'aliments traditionnels et de suivi socio-économique;
- Plan de surveillance des aliments traditionnels;
- Programmes de suivi pour la condition 3.14 du projet Blackwater Gold;
- Programmes de suivi pour la condition 3.15 du projet Blackwater Gold;
- Programmes de suivi pour la condition 3.16 du projet Blackwater Gold;
- Plan de surveillance et de gestion des eaux de contact avec la mine et des rejets du site minier;
- Plan pour les zones humides et la compensation;
- Plan de gestion du pin à écorce blanche; et,
- Plan d'atténuation et de surveillance de la faune.

D'ici la fin de l'année 2024, plus de 95 % de la construction était terminée, soutenant ainsi la première coulée d'or en janvier 2025. La construction durant cette période de rapport s'est concentrée sur l'abattage et le débroussaillage, la récupération des sols, le développement des routes, l'établissement d'infrastructures temporaires de gestion de l'eau destinées à soutenir la construction, la construction d'infrastructures permanentes de gestion de l'eau destinées à soutenir les opérations, le développement du barrage C du parc à résidus (TSF), ainsi que le développement du site de l'usine. Ce Plan de Suivi Final (FUP) résume les résultats des programmes de surveillance liés à cette phase, y compris un résumé de la gestion adaptative et des recommandations.

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Acronyms and Abbreviations

Aboriginal Groups or Indigenous Nations	Aboriginal Groups include: Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Stellat'en First Nation, Saik'uz First Nation, and Nazko First Nation (as defined by the EAC)
AEMP	Aquatic Effects Monitoring Program
AQDMP	Air Quality and Fugitive Dust Management Plan
Artemis	Artemis Gold Inc.
ARU	Autonomous Recording Unit
BC	British Columbia
Blackwater, Project, or Mine	Blackwater Mine or Blackwater Gold Project
BW Gold	BW Gold LTD.
CEMP	Construction Environmental Management Plan
CFMP	Country Foods Monitoring Plan
CMMP	Caribou Mitigation and Monitoring Plan
CPB	Call Playback
DFO	Fisheries and Oceans Canada
DS	Decision Statement
EAC	Environmental Assessment Certificate
EAO	BC Environmental Assessment Office
ECCC	Environment and Climate Change Canada
EMLI	Ministry of Energy, Mines and Low Carbon Innovation
ENV	Ministry of Environment and Climate Change Strategy
ESC	Erosion and Sediment Control
FLNRORD	Ministry of Forests, Lands, Natural Resource Operations, and Rural Development
FMSCP	Fuel Management and Spill Control Plan
FSR	Forest Service Road
FUP	Annual Follow-up Program Report
FWR	Freshwater Reservoir
IECD	Interim Environmental Control Dam
Indigenous groups or Aboriginal Peoples	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stellat'en First Nation, Nazko First Nation, Skin Tyee Nation, Tŝilhqot'in Nation, Métis Nation British Columbia, and Nee-Tahi-Buhn Band (as defined in the Federal Decision Statement)
JAIR or Joint MA/EMA Application	Joint Application Information Requirements for Mines Act and Environmental Management Act Permits
km	Kilometer
kV	Kilovolt
LDN	Lhoosk'uz Dené Nation
LPU	Local Population Unit
LSA	Local Study Area
m	Meter
M-246	Mines Act Permit M-246
MAR	Mine Access Road
MASL	Meters above sea level
MNBC	Métis Nation British Columbia
MSDP	Mine Site Water and Discharge Monitoring and Management Plan
MSTCP	Mine Site Traffic Control Plan
Mtpa	Million tonnes per annum
New Gold	New Gold Inc.
NFN	Nazko First Nation
NFNs	Nechako First Nations
NTBIB	Nee-Tahi-Buhn Band
NTU	Nephelometric turbidity unit
NVMP	Noise and Vibration Effects Monitoring and Mitigation Plan
PASS	Passive Air Sampling System

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

1 Introduction

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

The Mine is presently accessed via the Kluskus Forest Service Road (FSR), the Kluskus-Ootsa FSR and an exploration access road, which connects to the Kluskus-Ootsa FSR at km 142. The Kluskus FSR joins Highway16 approximately 10 km west of Vanderhoof. A new, approximately 13.8 km road (Mine Access Road; MAR) will be built to replace the existing exploration access road, which will be decommissioned. The planned new access is at km 124.5 km. Driving time from Vanderhoof to the Mine Site takes roughly 2.5 to 3 hours.

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

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

Mine construction is anticipated to take two years. Mine development will be phased with an initial milling capacity of 15,000 tonnes per day (t/d) or 5.5 million tonnes per annum (Mtpa) for the first five years of operation. After the first five years, the milling capacity will increase to 33,000 t/d or 12 Mtpa for the next five-years, and to 55,000 t/d or 20 Mtpa in Year +11 until the end of the 23-year mine life. The Closure phase is from Year +24 to approximately Year +45, ending when the Open Pit has filled to the target closure level and the TSF is allowed to passively discharge to Davidson Creek via a closure spillway. Post-closure phase begins in Year +46.

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

This is the Blackwater Gold Mine annual follow-up program (FUP) report for the January 1, 2024 – December 31, 2024, reporting period (reporting period), provided pursuant to the federal Environmental Assessment (EA) process.

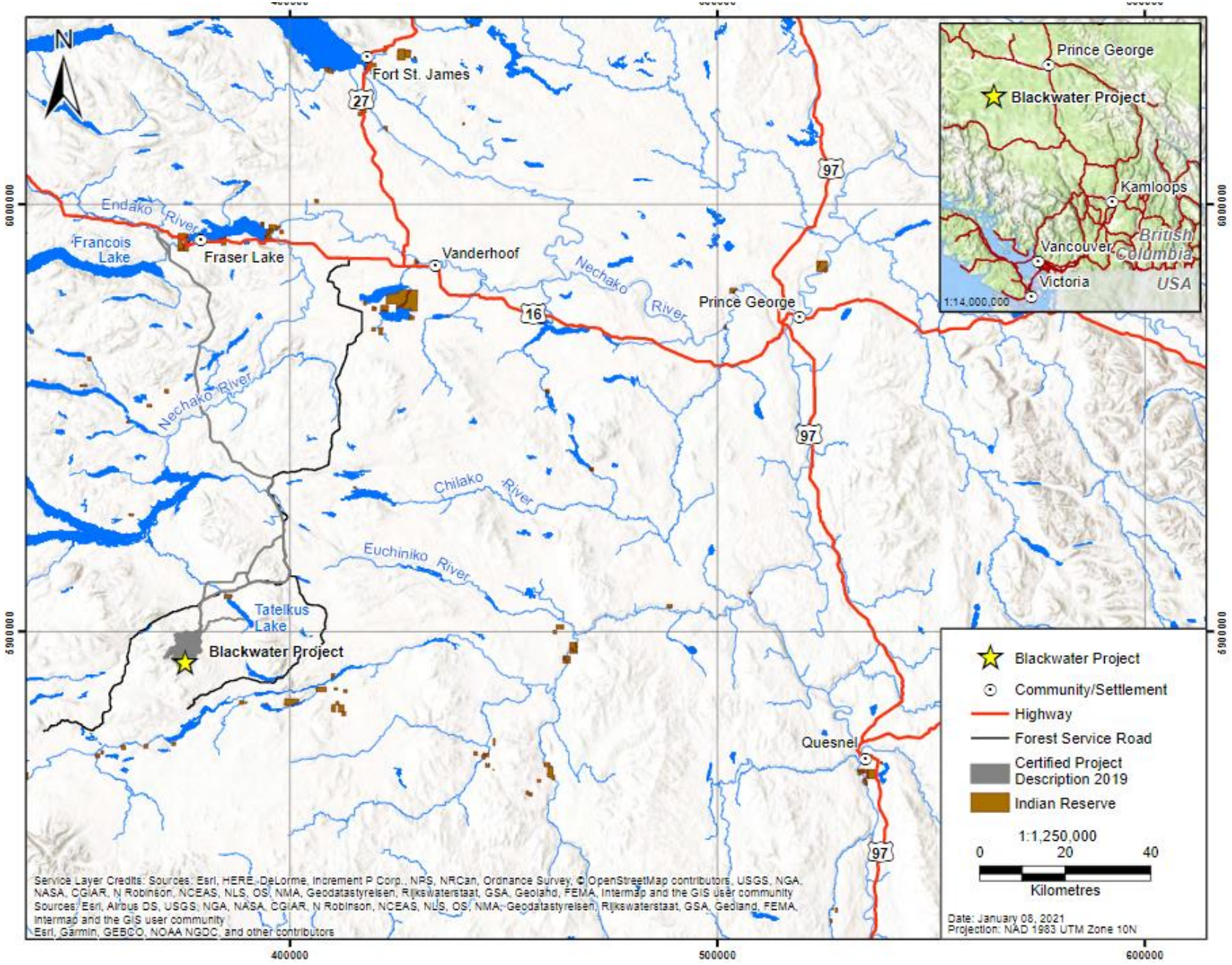

Figure 1-1: Project location

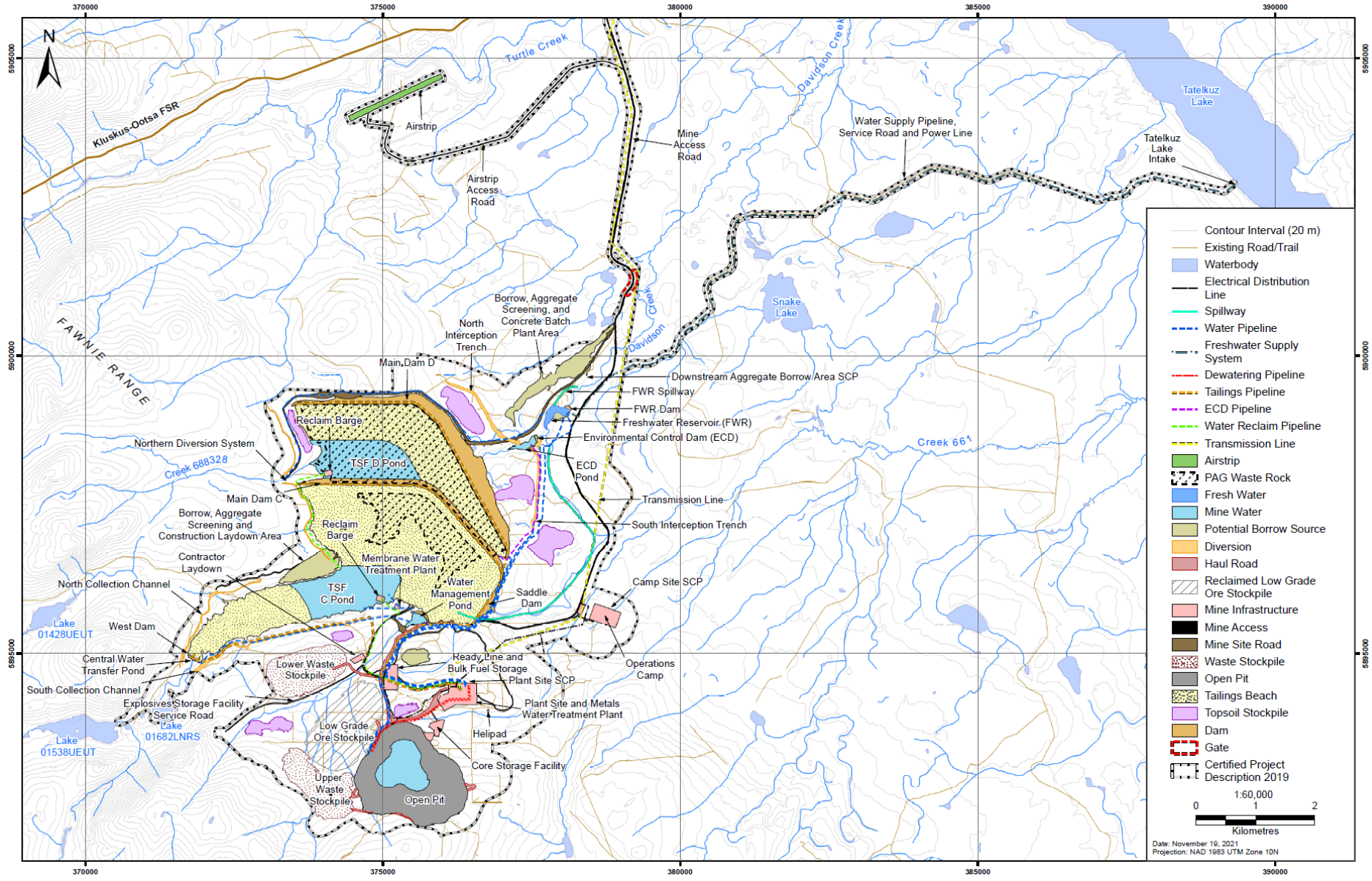

Figure 1-2: Overview of planned Mine works

1.1 Mine Activities

From January to December of 2024, the Mine continued with construction activities including the completion of the transmission line, installation of one clear span bridge at the Orica Laydown, clearing of various Mine site roads, two borrow sources in the future TSF basin and in the borrow area south of TSF, along the Central Diversion System, development of the Low-grade Ore stockpile foundation and water management structures, the Open Pit, and the Operational Camp area. In total 479.5 ha of disturbance occurred in 2024.

Development of the open pit initiated with blasting on November 9th, 2024, however no waste rock was placed on the Low Grade Ore or waste rock stockpiles, no operations of the processing plant occurred, and no tailings were produced in 2024.

Non-contact water was diverted around the Mine Site, with some of the diverted water reporting to Davidson Creek downstream of the location of the constructed Interim Environmental Control Dam (IECD). Non-contact water from the upper Davidson Creek watershed was diverted around the Tailing Storage Facility (TSF) construction area via the Davidson Creek Diversion Berm (DCDB) and the Davidson Creek Diversion System (DCDS) in Q1 2024. In April 2024, diversions of non-contact water were also initiated via the Central Diversion System, with some of the water ultimately reporting to the Water Management Pond (WMP) and some water reporting to Davidson Creek downstream of the location of the IECD.

The plant and associated facilities were not operational in 2024, and no air emissions from those point sources occurred. However, fugitive dust production occurred through construction activities and was mitigated in accordance with the Air Quality Fugitive Dust Management Plan, and the Fugitive Dust TRP.

Effluent discharge began in Q1 2024 through those sediment control ponds described below:

- Tailings Storage Facility Stage 1 Sediment Control Pond (TSF-SCP-D)
    - This is a temporary pond that began discharge to Davidson Creek. It is intended to support construction activities by capturing contact water from the upper Davidson Creek watershed.
- Plant Site Sediment Control Pond (PS-SCP-D)
    - This is a temporary pond that began discharge to ground. It is intended to support construction activities by capturing contact water from the Plant Site area.

A summary of specific activities undertaken to satisfy conditions of the DS conditions is presented in Appendix 2.

1.1.1 2024 Wildfire Season

On July 22, 2024, BW Gold announced that it had responded to a wildfire evacuation order by removing all non-essential staff and contractors from the Mine site as of July 21, 2024.

On July 24, 2024, BW Gold, notified regulatory agencies and Indigenous groups that, as a result of the reduced workforce, sampling and monitoring events required by Blackwater's authorizations, permits and management plans will be missed and that any missed sampling and monitoring events will be outlined in normal monitoring reports. As committed to in this communication, details on how the fire impacted monitoring activities has been included in applicable appendices and sections of this report.

On July 26, BW Gold notified regulatory agencies and Indigenous groups that the wildfire evacuation order had been lifted and that the staged return of employees and contractors to site would commence

over the coming days.

On August 2, BW Gold notified regulatory agencies and Indigenous groups that out-of-control wildlife coincided with portions of Creek 661 and Chedakuz Creek, where sampling and monitoring occur.

On August 13, BW Gold provided an update that the out-of-control wildlife that coincided with portions of Creek 661 and Chedakuz Creek was still burning and that it was still unsafe for personnel to be in the area.

During the October Environmental Life of Mine Committee (ELoMC), Triton presented Wildfire Impacts on Environmental Monitoring, explaining that access to Middle Chedakuz Creek and Creek 661area resumed on September 4; therefore, only partial kokanee spawner data collected in September for Middle Chedakuz and Creek 661. The team will think about how to interpret and account for fire impacts in their analysis.

Fire activity around the Blackwater Mine in July and August resulted in the removal of trees in the first half of August for the purposes of creating fire break around the operations camp. BW Gold determined these measures to be necessary with the circumstances presented and were reasonable steps to maintain the safety of the camp (both people and infrastructure). We understand that the Forest and Range Practices Act allows a person to take reasonably necessary steps to control a fire, unless the person knows or reasonably ought to know that the fire is under control. Approximately 1.2ha of the area cleared fell outside of the Certified Project Description (Mine Site) boundary and Permitted Mine Area. No infrastructure has been built in the fire break. This information was provided by BW Gold to the EAO and EMLI on August 30, 2024 and the Independent Environmental Monitor (IEM) on September 1, 2024.

1.2 Report Scope and Navigation

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

Table 1-1: Summary of condition 2.11

Condition	Section
2.11.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;	Appendix 1
2.11.2 how the Proponent complied with condition 2.1;	Section 1.4 Implementation (2.1)
2.11.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation, including a rationale for how the views have, or have not, been integrated;	Appendix 2 Section 1.3.2 Follow-Up Program Updates
2.11.4 The information referred to in conditions	Appendix 2

2.5 and 2.6 for each follow-up program;	Section 1.3.2 Follow-Up Program Updates
2.11.5 The results of the follow-up program requirements identified in conditions 3.14, 3.15, 3.16, 4.5, 5.5, 6.11, 6.12, 6.13, 6.14, 8.18.6, 8.20.5, 8.21, and 8.22 if required;	Table 1-2
2.11.6 Any update made to any follow-up program in the reporting year;	Section 1.3.2 Federal Follow-Up Program Updates (2.6)
2.11.7 Any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.9 and rationale for why mitigation measures were selected pursuant to condition 2.5.4; and	Table 1-2
2.11.8 Any change(s) to the Designated Project in the reporting year.	Section 1.3.1 Designated Project (2.17)

Table 1-2: DS condition navigation summary

Condition No.	Condition	Section (DS 2.11.5, 2.11.7)	Appendix
3.14	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects of the Designated Project on fish and fish habitat. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall…	2 Fish and Fish Habitat (3.14)	Appendix 3: FINAL REPORT Blackwater Gold Project Condition 3.14 Follow-up Program 2024 Results Report
3.15	The Proponent shall develop, in consultation with Indigenous groups and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects of the Designated Project on fish habitat in Davidson Creek, Creek 661 and Chedakuz Creek. The Proponent shall develop the follow-up program prior to construction and shall implement the follow-up program during all phases of the Designated Project. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall…	3 Water Quality and Quantity (3.15)	Appendix 4: 2024 Follow-up Programs for Condition 3.15 of the Blackwater Gold Project Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012
3.16	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to fish habitat in Tatelkuz Lake and Chedakuz Creek. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall:	4 Fish Habitat (3.16)	Appendix 5: FINAL REPORT Blackwater Gold Project Condition 3.16 Follow-up Program 2024 Results Report
4.5	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of all mitigation measures to avoid harm to migratory birds, including migratory birds that are listed species at risk, their eggs and nests. The follow-up program shall include the mitigation measures used to comply with condition 4.1 to 4.4. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.	5 Migratory Birds (4.5)	Appendix 6: 2024 Wildlife Mitigation and Monitoring Program Compliance Report
5.5	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the predictions of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on wetland functions and to determine the effectiveness of the mitigation measures as it pertain to wetlands. The Proponent shall implement the follow-up program during from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall…	6 Wetlands (5.5)	Appendix 7: 2024 Wetland Annual Reclamation Report
6.11	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the health of Indigenous Peoples caused by changes in concentrations of contaminants of potential concern in water, soil, vegetation and wildlife, including fish, and determine the effectiveness of mitigation measures. As part of the development of the follow-up program, the Proponent shall identify the vegetation and wildlife species that shall be monitored, the locations where the monitoring will be conducted, the contaminants to be monitored and the frequency of the monitoring. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. In doing so, the Proponent shall…	7 Country Foods (6.11) (6.13)	Appendix 8-1: 2024 Country Foods Monitoring Plan Annual Report
6.12	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the health of Indigenous Peoples as a result of changes to air quality and determine the effectiveness of mitigation measures. As part of the implementation of the follow-up program, the Proponent shall monitor nitrogen dioxide (NO2), sulfur dioxide (SO2), fine particulate matter (PM2.5), particulate matter (PM10), dust, and carbon monoxide (CO) in air. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.	8 Air Quality (6.12)	Appendix 9: Air Quality and Fugitive Dust Management Annual Report 2024

Condition No.	Condition	Section (DS 2.11.5, 2.11.7)	Appendix
6.13	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the socio-economic conditions of Indigenous Peoples as a result of changes to access, availability and quality of country foods. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.	7 Country Foods (6.11) (6.13)	Appendix 8-2: 2024 Annual Monitoring Report Country Foods Socio-economic Conditions Follow-up Program (DS 6.13)
6.14	The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse effects from the Designated Project on moose (*Alces alces*) and determine the effectiveness of mitigation measures. As part of the implementation of the follow-up program, the Proponent shall conduct winter distribution and density surveys for moose (*Alces alces*) starting prior to construction and until the end of operation. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.	9 Effects on Moose (6.14)	Appendix 6: 2024 Wildlife Mitigation and Monitoring Program Compliance Report
8.18.6	A description of the follow-up program the Proponent shall implement to determine the effectiveness of the mitigation measures included in the compensation plan. As part of the development of the follow-up program, the Proponent shall determine, in consultation with Indigenous groups, the methods, timing and frequency for conducting winter surveys for caribou abundance and distribution within the Designated Project area. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program.	10 Effects on Caribou (8.18.6)	Appendix 6: 2024 Wildlife Mitigation and Monitoring Program Compliance Report
8.20.5	Develop and implement a follow-up program in consultation with Indigenous groups to determine the effectiveness of the mitigation measures included in the whitebark pine management plan. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program. The follow-up program shall include…	11 Whitebark Pine (8.20.5)	Appendix 10: BW Gold Whitebark Pine
8.21	The Proponent shall develop, in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to the effects of changes caused by the Designated Project on western toad (*Anaxyrus boreas*). The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall…	12 Effects on Western Toad (8.21)	Appendix 6: 2024 Wildlife Mitigation and Monitoring Program Compliance Report
8.22	The Proponent shall develop, in consultation with Indigenous groups, and implement a follow-up program to monitor little brown myotis (*Myotis lucifugus*) and northern myotis (*Myotis septentrionalis*) usage of buffer zones established pursuant to condition 8.14 and roosting structures installed and maintained by the proponent pursuant to condition 8.15 to determine the effectiveness of the mitigation measures. The Proponent shall implement the follow-up program during construction and operation and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.	13 Effects on Bats (8.22)	Appendix 6: 2024 Wildlife Mitigation and Monitoring Program Compliance Report

1.3 Federal Decision Statement Administration

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

1.3.1 Designated Project (2.17)

No changes to the Designated Project have been made.

1.3.2 Follow-Up Program Updates (2.6)

Table 1-4 summarizes those follow-up programs that were updated during the reporting period. Each submission included a change log outlining where updates had been made. Appendix 2 provides details regarding the consultation of these plans. including the change logs provided with each submission.

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

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

Follow-Up Program	Description
Country Foods Monitoring Plan (CFMP)	The Country Foods Monitoring Plan (CFMP) was not updated in 2024, however the: • Human Health Triggers for Adaptive Management (May 2023) was developed to align with commitments made in the CFMP relative to conditions of EAC M19-01.
Weland Management Offsetting Plan (WMOP)	The WMOP was approved by EAO on February 14, 2023 with additional direction for BW Gold. Based on this direction, an updated WMOP was provided on March 28, 2024.

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

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

Follow-Up Program	Description
Aquatic Effects Monitoring Plan	An updated AEMP was provided on April 30, 2024. • Following the July 4, 2023 submission, ENV provided comments on the Plan. Following discussion with BWG it was confirmed that it would be updated by April 30, 2024 • Additional comments on the AEMP have been provided by First Nations following their review of the AEMP. An updated AEMP was provided on December 6, 2024. • AEMP Version 2 (AEMP V2) was submitted April 30, 2024 and included updates made based on the 2023 AEMP Interpretive Report as well as comments from reviewers. Since the submission of the AEMP V2, engagement with the Ministry of Environment and Climate Change Strategy, BC Ministry of Water, Land and Resource Stewardship, and the Nechako First Nations continued, resulting in the development of the AEMP Version 3 (AEMP V3).

1.3.3 Reporting Period Alignment

On March 25, 2025, IAAC provided BWG with an updated Federal DS which aligned the federal reporting period with the provincial reporting period. As reflected in previous reports, this change follows conversations with IAAC and communications with Indigenous groups.

As a result of the revised reporting period, this submission reflects January – December 2024. Due to the timing of this decision, and as reflected in the updated condition 2.12, this submission is made June 30, 2025, however in future years submission will be made by March 31.

1.4 Implementation (2.1)

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

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

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

1.5 Consultation (2.12)

As per condition 2.12 (shown below), a draft, annual report was provided to the LDN, UFN, NFNs, NFN, STN, TNG, NTBIB, Métis Nation British Columbia (MNBC), Cheslatta Carrier Nation, and Yekooche First Nation on June 30, 2025.

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

LDN, UFN, and the NFNs provided comments on the draft annual report. The comments have been categorized into four types, based on BW Gold's follow-up actions:

1. BW Gold will respond by either providing clarification or the information requested by the reviewers.
2. BW Gold will respond by indicating the opportunity to continue to discuss through existing forums, and identifying opportunities for involvement offered through management plans, such as the Aboriginal Group Monitoring Plan.
3. BW Gold will aim to include an update the 2024 report, the ability to accommodate this is dependent on timing of the comment.
4. BW Gold will respond to by noting that the comment provided will be considered as part of the

next report, or as part of a future update to the applicable FUP. Opportunities to continue discussion on those concerns and recommendations based on priorities are in place following submission of this report.

An overview of the appendices on which LDN/UFN and the NFNs provided commented, are presented in following subsections. Additionally, a brief summary of the discussions between BW Gold and the Nations following receipt of the comments is provided.

1.5.1 Lhoosk'uz Dené Nation and Ulkatcho First Nation

Feedback on the annual report was requested by August 1, 2025, and comments were received on the following dates from the parties indicated:

- August 12, 2025, on behalf of LDN, UFN, and NFNs:
  - Appendix 4: *2024 Follow-up Programs for Condition 3.15 of the Blackwater Gold Project Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012*
- August 27, 2025, on behalf of LDN and UFN:
  - Appendix 7: *2024 Wetland Annual Reclamation Report*
  - Appendix 8-1: *Country Food Monitoring Program Annual Report*
  - Appendix 8-2: *Country Foods and Socio-economic Follow-Up Program Annual Report*
  - Appendix 9: *Air Quality and Fugitive Dust Management Annual Report* 2024
  - Appendix 10: *BW Gold Whitebark Pine*
- September 18, 2025, on behalf of UFN:
  - Appendix 6: *2024 Wildlife Mitigation and Monitoring Program Compliance Report*

On September 19, 2025, in a meeting between BW Gold, LDN, and UFN next steps in addressing the received comments were discussed. This included an overview of how the August 12 and August 27 comments were categorized (Section 1.5), high level discussion on draft responses, and confirmation that final written responses to those comments are to be provided to them by September 30, 2025. The group acknowledged that opportunities to continue discussion on those concerns and recommendations based on priorities are in place following this submission.

During this discussion BW Gold noted that responses to comments received on the *2024 Wildlife Mitigation and Monitoring Program Compliance Report* would not be included in this submission due to the delayed delivery, it was agreed that concerns and recommendations would be discussed based on priorities.

1.5.2 Nechako First Nations

Feedback on the annual report was initially requested by August 1, 2025. Comments from NFNs were received on the following dates:

- August 12, 2025:
  - Appendix 4: *2024 Follow-up Programs for Condition 3.15 of the Blackwater Gold Project Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012*
- September 8, 2025:
  - Appendix 3: *FINAL REPORT Blackwater Gold Project Condition 3.14 Follow-up Program 2024 Results Report*
  - Appendix 5: *FINAL REPORT Blackwater Gold Project Condition 3.16 Follow-up Program 2024 Results Report*

On August 21, 2025, BW Gold met with the NFNs to review the comments and responses related to Condition 3.15. This included a detailed overview of draft responses to those comments.

A subsequent meeting was held on September 18, 2025, during which BW Gold and the NFNs discussed the comments and proposed responses for Conditions 3.14 and 3.16. This included an overview of how the September 8th comments were categorized (Section 1.5), high level discussion on draft responses, and confirmation that final written responses to those comments are to be provided to them by September 30, 2025. The group acknowledged that opportunities to continue discussion on those concerns and recommendations based on priorities are in place following this submission.

2 Fish and Fish Habitat (3.14)

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

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

The programs and their results are presented in Appendix 3: *Follow-Up Programs for Condition 3.14 Annual Report 2024.*

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

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

Condition No.	Condition	Appendix	Section
3.14.	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Fisheries and Oceans Canada, and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects of the Designated Project on fish and fish habitat. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall:	Described in the *Follow-up Programs for Condition 3.14 of the Blackwater Gold Project Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012*	
3.14.1.	Conduct parasite and pathogen inventories in Lake 01538UEUT and Lake 01682LNRS prior to enlarging Lake 01682LNRS and connecting it to Lake 01538UEUT pursuant to condition 3.13 and compare the results of the parasite and pathogen inventories for the two lakes;	Described in the *Follow-up Programs for Condition 3.14 of the Blackwater Gold Project Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012*	Complete in 2021 (Palmer, 2023a).
3.14.2.	Monitor, starting when the Proponent starts to pump water into Davidson Creek and continuing through until the freshwater supply system has been decommissioned, rainbow trout (*Oncorhynchus mykiss*) and Kokanee (*Oncorhynchus nerka*) populations in Davidson Creek, including	Appendix 3: *Follow-Up Programs for Condition 3.14 Annual Report 2024*	2.0 Young-of-Year and Juvenile Rainbow Trout Summer Abundance (Appendix 3) 4.0 Rainbow Trout Spring Spawner and Redd Abundance (Appendix 3) 5.0 Kokanee Summer Spawner and Redd Abundance (Appendix 3) 8.0 Rainbow Trout and Kokanee Genetic Structure (Appendix 3)
3.14.2.1.	Community composition of rainbow trout (*Oncorhynchus mykiss*) and Kokanee (*Oncorhynchus nerka*), their absolute abundance, genetic structure and diversity;		
3.14.2.2.	Absolute abundance of overwintering rainbow trout juveniles; and		3.0 Juvenile Rainbow Trout Overwintering Abundance (Appendix 3) 4.0 Rainbow Trout Spring Spawner and Redd Abundance (Appendix 3)
3.14.2.3.	Characteristics of spawner populations through surrogate monitoring metrics including size at 50% maturity, redd counts and spawner distribution.		5.0 Kokanee Summer Spawner and Redd Abundance (Appendix 3) 6.0 Kokanee Fry Spring Outmigration (Appendix 3) 7.0 Dissolved Free Amino Acid Sampling (Appendix 3)

2.1 Monitoring and Analysis

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

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

Table 2-2: Summary of DS condition 3.14 follow-up monitoring (Triton, 2025a)

Monitoring	Survey /Methodology	Dates	Results Summary	Adaptive Management/Recommendations
Juvenile Rainbow Trout Overwintering Abundance Survey	**Appendix 3.0, Section 3.1.2 and 3.2.2**	Mid-winter: March 2024 Spring post-overwintering: April 2024 Fall pre-overwintering: October 2024	**Appendix 3, Section 3.0** During mid-winder surveys one Rainbow Trout (maxN) was recorded at three of the ten sites. Dissolved oxygen levels were generally high and flowing water was observed at all sites. Post-overwintering abundance results, ranging from 21 ± 3.36 to 99 ± 11.93 fish per site were compared to those from the 2023 pre-overwintering survey to determine overwintering mortality (OWM); OWM ranged from -30.3 % to 87.0%. Pre-overwintering abundance results, ranging from 120 ± 10.22 to 273 ± 35.03 fish per site, were compared to 2023; abundance was significantly different at a single site and was higher in 2024 than in 2023. No significant differences in fish density during pre-overwintering surveys was found at any site between years.	**Appendix 3, Section 3.2.5** No recommendations resulted from the 2024 juvenile Rainbow Trout overwintering abundance program.
Young -of-the-year and juvenile Rainbow Trout Summer Abundance	**Appendix 3, Section 2.2**	July 14 – August 21, 2024	**Appendix 3, Section 2.4** Rainbow Trout abundance estimates ranged from 57 to 247 fish per site. A significant difference in fish abundance and density was observed at a single site compared to 2023. Length-frequency distributions indicated a higher proportion of Rainbow Trout less than 50 mm in 2024. Length-age regressions suggested the growth rate of Rainbow Trout was slightly higher than in 2023. No significant differences in mesohabitat abundance were observed between 2023 and 2024 at any site.	**Appendix 3, Section 2.5** No recommendations resulted from the 2024 YOY and juvenile Rainbow Trout summer abundance program.
Kokanee Fry Spring Outmigration Survey	**Appendix 3, Section 6.2**	April 25 - June 10, 2024	**Appendix 3, Section 6.4** Two estimates of Kokanee fry abundance were derived, one used an area-based approach that related the wetted net opening area to the cross-sectional wetted channel area, adjusted for the time interval sampled. The second estimate was derived using trap-efficiency determined by a mark-recapture program. Both resulting estimates of abundance (area-based = 31,478, mark-recapture = 69,603) were higher than the 2023 estimate. Although the sampling program was initiated earlier than in previous years, it was determined that Kokanee fry outmigration began earlier than April 25, 2024; outmigration also began earlier than was predicted based on accumulated thermal units.	**Appendix 3, Section 6.5** Recommendations resulting from the 2024 Kokanee fry program include: • Utilize paired funnel nets to sample Kokanee fry to improve sampling coverage and increase probability of fish capture; and • Shift sampling start date earlier to capture the onset of Kokanee fry outmigration, with the approximate start date being informed by calculation of ATUs.
Rainbow Trout Spring Spawner and Redd Abundance Survey	**Appendix 3, Section 4.2**	Box Traps in Lower Davidson Creek: April 25 to June 17, 2024 Box Traps in Upper Davidson Creek: April 6 to June 20, 2024 Bank Walks: April 26 and June 21, 2024	**Appendix 3, Section 4.4** Box traps installed in the lower reach of Davidson Creek resulted in the capture of 878 fish, including 698 adult Rainbow Trout. Box traps installed in the reach near the mine footprint resulted in the capture of 63 adult Rainbow Trout. A total of 83 bank walk surveys were conducted between April 26 and June 21, 2024. Total Rainbow Trout spawner abundance was determined to be 488 unique individuals.	**Appendix 3, Section 4.5** Recommendations resulting from the 2024 Rainbow Trout spawner program include: • Shift the sampling period timing earlier to mid-April and end in late June with the aim to achieve comprehensive coverage of the Rainbow Trout spawning migration and to facilitate the capture of Rainbow Trout during their upstream spawning migration; • Redesign the current box traps to reduce the potential for impingement and mortality of captured fish. Specifically replace the 1” hardware cloth mesh with ½” mesh size to reduce the entanglement of small fish; and • Investigate the potential use of PIT tag arrays to determine distribution of spawning Rainbow Trout in Davidson Creek to replace the Rainbow Trout visual spawner surveys and the box trap sampling at the DC-8 location. Visual spawner surveys provide limited data when water clarity and high flow conditions, that are experienced throughout freshet, limits observer efficiency. Adult fish returning to Davidson Creek to spawn are initially captured at DC-1; replacing the box trap at DC-8 with a PIT Tag array would reduce the number of times fish are subsequently captured and handled.

Monitoring	Survey /Methodology	Dates	Results Summary	Adaptive Management/Recommendations
Kokanee Summer Spawner and Redd Abundance	**Appendix 3, Section 5.0**	July 15 - September 26, 2024	**Appendix 3, Section 5.4** A real spawner densities ranged from 0 to 80 Kokanee/100 m^2, with the peak spawner density occurring in late August. Redd densities ranged from 0 to 6.8/100 m^2, with peak redd density occurring in late September. Kokanee escapement estimates were determined via Gaussian area-under-the-curve and Trapezoidal area-under-the-curve methodologies, based on live counts adjusted for observer efficiency. The 2024 Davidson Creek Kokanee GAUC escapement was estimated at 9,058 (6,336 to 11,644), while the TAUC estimate 8,923 (6,201 to 11, 644).	**Appendix 3, Section 5.5** Recommendations resulting from the 2024 Kokanee spawner program include: • Minor adjustment to the boundary between DC-2-KO and DC-3-KO. The presence of a major beaver dam limits Kokanee spawning to a short (approximately 90 m) section of DC-3-KO downstream of the dam. Adjusting the boundary to the beaver dam will align with recommendations made in the AEMP and will help to augment the survey length of DC-2-KO.
Dissolved Free Amino Acids	**Appendix 3, Section 7.0**	June and August	**Appendix 3, Section 7.0** Dissolved free amino acid (DFAA) profiles were determined from surface water samples collected twice in 2024, during the Kokanee fry outmigration and spawning windows. DFAA are used by salmonids for olfactory imprinting and homing to natal streams and the laboratory results will be used in future years to determine if amino acid concentrations in Davidson Creek are altered by the operation of the Fresh Water Supply System.	
Rainbow Trout and Kokanee Genetics Structure and Diversity	**Appendix 3, Section 8.0**	Summer 2024	**Appendix 3, Section 8.0** Tissue samples (fin/adipose clips) were collected from Rainbow Trout and Kokanee in Davidson Creek in 2024 to monitor genetic structure and diversity. Genetic analysis aims to determine whether a deviation from equilibrium is observed that may be attributable to impacts from the Mine. Overall measures of FST, a measure of genetic differentiation between populations, remained virtually identical for both Rainbow Trout and Kokanee between the 2022 and 2024 analysis.	

3 Water Quality and Quantity (3.15)

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

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

While condition 3.15.3 is addressed through groundwater monitoring included in the *Mine Site Water and Discharge Monitoring and Management Plan* (MSDP) (Blackwater Gold Ltd, 2025a).

A summary of the activities undertaken through these programs as they relate to condition 3.15 have been compiled in the *2024 Follow-up Programs for Condition 3.15 of the Blackwater Gold Project Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012* (Appendix 4).

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

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

Condition No.	Condition	Appendix	Section
3.15.	The Proponent shall develop, in consultation with Indigenous groups and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects of the Designated Project on fish habitat in Davidson Creek, Creek 661 and Chedakuz Creek. The Proponent shall develop the follow-up program prior to construction and shall implement the follow-up program during all phases of the Designated Project. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall:	Described in the memo regarding *Federal Decision Statement Condition 3.15* (Artemis Gold Inc., 2022)	
3.15.1.	Monitor water flows in Davidson Creek during the open water season from construction until decommissioning, and temperature continuously from construction until decommissioning;	Appendix 4: 2024 Follow-up Programs for Condition 3.15 of the Blackwater Gold Project Decision Statement issued under Section 54 of the Canadian Environmental Assessment Act, 2012	2.0 Monitoring Flows and Temperature in Davidson Creek
3.15.2.	Monitor water quality in Davidson Creek, Creek 661 and Chedakuz Creek for contaminants of potential concern, including those identified in Table 5 of the environmental assessment report, during all phases of the Designated Project; and		3.0 Monitoring Water Quality in Davidson Creek, Creek 661, and Chedakuz Creek for Contaminants of Potential Concern
3.15.3.	Monitor, during all phases of the Designated Project, groundwater quality and quantity downstream of the tailings storage facility site D, open pit, west waste rock dump and low-grade ore stockpile to confirm that groundwater quantity and quality parameters are at or below the values identified by the Proponent in the modelled predictions in Section 5 of Blackwater Gold Project: Additional Water Quality Model Sensitivity Scenario (July 20, 2017) and Section 3 of Blackwater Gold Project: Water Treatment Responses for Comments 1266, 1270, 1271, 1272, and 1273 (February 15, 2017) for nitrite and contaminants of potential concern, and to verify the effectiveness of water management measures.		4.0 Monitoring Groundwater Quality and Quantity

3.1 Monitoring and Analysis

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

Table 3-2: Summary of DS condition 3.15 follow-up monitoring (Blackwater Gold Ltd, 2025)

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendation
Davidson Creek Flows – Comparison to Environmental Assessment	**Appendix 4, Section 2.3.3**	**Appendix 4 Section 2.3.3**	**Appendix 4 Section 2.3.3** Observations of flows below the applicable Construction Instream Flow Needs (CIFN) occurred in January, February, March, and July 2024. Those instances were reviewed, mitigative actions taken, and learnings adopted to prevent re-occurrence where possible. These events were not the result of water usage, or storage, to support construction or operations, but the result of conditions (i.e.: low water level, malfunction of the pump operating system, and freezing conditions) encountered while operating the DCDS.	**Appendix 4 Section 2.3.5** Actions taken to address those conditions proved to be effective, as they resulted in flows meeting CIFN. Those included: • Setting the DCDS pumping system to better match pumping rates to system inflows to avoid low water levels; and • Establishing a heating system along the pumping system to limit the potential for freezing • QA/QC of hydrology station and review of rating curve developed for flow application
Davidson Creek Temperature – Comparison to Environmental Assessment	**Appendix 4, Section 2.3.4**	**Appendix 4 Section 2.3.4**	**Appendix 4 Section 2.3.4** Stream temperature measurements were beyond the screening thresholds on eight occasions at ST-08 DEEP in 2024, with five of the events realized between July 17 and July 21, and the remainder realized between September 23 and September 25. These are interpreted with a high level of confidence as being climate-induced and within the natural range of variability for stream temperatures in lower Davidson Creek.	
Monitoring Water Quality	**Appendix 4, Section 3.2**	**Appendix 4, Section 3.4.1**	**Appendix 4, Section 3.5** In summary, monitoring indicated changes in water quality at Davidson Creek and Creek 661 due to construction activities (e.g., TSFC-SCP discharge, runoff from earthworks) and potential contributions from overland flow over the 2023 fire-impacted areas. While changes in water quality were also observed at Chedakuz Creek, these changes were also likely influenced by non-mine related sources (e.g., forest harvesting, road/trail networks, cattle grazing) and the 2024 wildfire. Water quality parameter concentrations within the Mine receiving environment (Davidson Creek, Creek 661, and Chedakuz Creek) were typically lower than WQG-AL or exceedances of the guideline tended to be a similar frequency and magnitude when compared to baseline. However, many parameter concentrations were outside the range predicted in the EA and/or the 2022 model. Therefore, the observed changes did not always align with the potential effects identified in the EA. However, the potential for Mine-related changes in water quality during construction are primarily through increases in TSS and particulate-bound metals due to earthworks activities, which are not accounted for in source terms used in the mass-balance surface water quality model.	**Appendix 4, Section 3.5** BW Gold implemented a number of mitigations at the TSFC-SCP (e.g., protocols were put in place for risk mitigation within work areas of potentially high clay materials and flocculant product was initiated to reduce sediment loading to the receiving environment) in response to turbid water entering Davidson Creek. No additional discharge from the TSF-SCP or the PS-SCP will occur. Mitigations applied in response to changes in Davidson Creek water quality are expected to be applicable to Chedakuz Creek.

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendation
			These issues are not unusual for projects in construction phase and are not unique to the Mine. In addition, the EA did not consider the potential for wildfire activity in catchments adjacent to the Mine.	
			Appendix 4, Section 4.4 Groundwater levels at monitoring locations across the Mine generally fluctuated within the range of historic measurements at the sites, although similar to 2023, they were at the lower end of that range at many sites. Short-term increases in groundwater levels were recorded at shallow monitoring sites in the areas of the TSF and RIBs (MW22-03S, MW23-02S, and MW23-05S). Responses are suspected to be attributable to infiltration to the shallow groundwater system by snowmelt and possibly exfiltration of water by the RIBs, in the case of MW23-02S. Groundwater quality results measured during the 2024 construction period were compared to mean results during the baseline period, model predictions, and water quality standards. A change in concentration between baseline and the construction period was assessed using graphical analysis. Water quality in 2024 was generally consistent with 2023 and baseline conditions and did not display any significant trends in concentration attributable to Mine development except possibly at shallow monitoring wells MW23-02S, MW23-03S, MW23-05S where increasing chloride concentrations are observed, albeit at low concentrations several orders of magnitude below the CSR AL standard. The detection of the low concentrations of chloride at these monitoring wells may be Mine-related or related to the 2023 wildfire given these three monitoring wells are located in different areas of the Mine (Plant Site RIBs area, Stockpiles area, TSF area, respectively). Groundwater sampled in monitoring well MW23-02S downgradient of the Plant Site RIBs appears to have been influenced by water managed in the RIBs in early 2024. Concentrations of several dissolved metals were elevated in samples collected during the first half of the year and decreased in samples collected in the latter half of the year when the RIBs were no longer used to manage water from the Plant Site SCP. Comparison of water quality parameters from monitoring wells downgradient of the Plant Site against predicted concentrations of seepage included in the 2022 modelling presented in the Joint MA/EMA Application identified measured concentrations of dissolved aluminum, chromium, and iron greater than the predicted concentrations at MW23-02S. Concentrations of total aluminum at the	**Appendix 4, Section 4.4** No additional discharge from the PS-SCP will occur.
Monitoring Groundwater Quality and Quantity	**Appendix 4, Section 4.2**	**Appendix 4, Section 4.2**		

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendation
			downgradient surface water sampling site located on a tributary to Creek 661 (661-05) were elevated in freshet 2024 at concentrations higher than detected in groundwater. Discharges to ground via the Plant Site SCP were unlikely to affect changes in concentration of total metals downgradient of the RIBs in Creek 661 since the particulates (i.e., TSS) are filtered from groundwater by the ground and are unlikely to reach or affect surface waters. No effects to aquatic life were expected given the low magnitude of the surface water quality exceedance during construction. There are no further discharges to ground planned from the Plant Site SCP in 2025 and PE-110652 does not authorize discharges from the Plant Site SCP beyond the Construction phase.	

4 Fish Habitat (3.16)

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

a) Conduct, prior to the commissioning of the freshwater supply system (FWSS) as the main mitigation measure for loss of water in Davidson Creek, fish habitat and quality surveys in the Tatelkuz Lake littoral zone

b) Monitor Tatelkuz Lake littoral zone for the commissioning of the freshwater supply system until decommissioning.

c) Monitor water flows in lower Chedakuz Creek between Tatelkuz Lake and the confluence with Davidson Creek during the open water season from Construction until Decommissioning.

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

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

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

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

4.1 Monitoring and Analysis

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

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

Table 4-2: Summary of DS condition 3.16 follow-up monitoring (Triton, 2025b)

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendations
Lower Chedakuz Creek Fish and Fish Habitat Monitoring	**Appendix 5, Section 3.1.2** Overwintering Fish Habitat	March 12, 2024	**Appendix 5, Section 3.1.5** Winter habitat availability in Lower Chedakuz Creek was assessed via measurements of snowpack thickness, ice depth, and water quality measurements. Based on observed conditions, it is likely Lower Chedakuz Creek is snow and ice free all year near the confluence with Tatelkuz Lake.	**Appendix 5, Section 3.1.6** No additional sampling or analyses other than those described in the FUP for Condition 3.16 is recommended.
	Appendix 5, Section 3.2.2 Summer Fish Habitat	July 20, 2024	**Appendix 5-1, Section 3.2.5** Fish Habitat Assessment Procedures (FHAP) and in situ water quality sampling were completed in Lower Chedakuz Creek. There were no significant differences in mesohabitat abundance observed as compared to 2023.	**Appendix 5, Section 3.2.6** No additional sampling or analyses other than those described in the FUP for Condition 3.16 is recommended.
	Appendix 5, Section 3.3.2 Summer Fish Community and Abundance	Electrofishing: July 11 – 13, 2024 Minnow Trapping: July 9 and September 19, 2024	**Appendix 5, Section 3.3.5** Abundance and distribution of immature and small-bodied fish within Lower Chedakuz Creek were assessed via minnow-trapping and electrofishing surveys. Minnow-trapping catch per unit effort (CPUE) in 2024 was generally consistent with CPUE measured in previous years.	**Appendix 5, Section 3.3.6** For future field programs, it is recommended that the timing of the minnow-trapping fish sampling component be adjusted to late summer or early fall, when water temperatures are lower to improve catch rates and lower potential handling stress on captured fish. Sampling in late August or early September would provide comparable timing to sampling conducted in 2022 through 2024. It is also recommended that the three-pass electrofishing fish sampling component be discontinued. Electrofishing efficiency and effectiveness proved difficult to achieve due to the large channel size in Lower Chedakuz Creek. Fish were readily able to evade capture regardless of the number of electrofishing passes completed, rendering depletion difficult to achieve. The resulting abundance estimates likely do not reflect the actual abundance of fish species inhabiting Lower Chedakuz Creek.
	Appendix 5, Section 3.4.3 Kokanee Summer Spawner and Redd Abundance	July 20, 2024 August 2, 5, 13, 20, and 27, 2024 September 3, 10, and 17, 2024	**Appendix 5, Section 3.4.5** Visual spawner surveys were completed to determine the abundance of mature Kokanee in the section of Lower Chedakuz Creek between Tatelkuz Lake and the confluence with Davidson Creek. Similarly to previous years, no spawning Kokanee or Kokanee redds were observed. Limited observations of holding/migration Kokanee were made suggesting that this section of Lower Chedakuz Creek is primarily used for migration/holding rather than spawning.	**Appendix 5, Section 4** For future field programs, it is recommended that the Kokanee spawner surveys be discontinued in the Lower Chedakuz Creek section, between the outlet of Tatelkuz Lake and the confluence with Davidson Creek (CC_3.16). The lack of spawning observed during multiple years of surveys in this section indicate that the value of completing visual spawner surveys in this section is relatively limited. Other sections of Lower Chedakuz Creek, further downstream, are surveyed for spawning Kokanee under the Aquatic Effects Monitoring Program.
Tatelkuz Lake Fish and Fish Habitat Monitoring	**Appendix 5, Section 2.1.2** Limnology and Winter Ice Conditions	Habitatr Assessment: March 12, 2024 In-situ Water Quality:	**Appendix 5-1, Section 2.1.4** Tatelkuz Lake physical limnology and winter ice condition surveys occurred at one mid-lake sampling location (TL LIM3) and assessments of winter ice conditions and in situ water quality measurements occurred at four nearshore sampling locations (TL BMC1 – TL BMC4). Tatelkuz Lake	**Appendix 5, Section 2.1.5** No additional sampling or analyses other than those described in the FUP for Condition 3.16 is

		March 12, 2024 Limnology – Vertical Profile + Water Sample: March 14, June 6, August 24, September 9, and October 17	was thermally stratified in June, August, and October 2024. Dissolved oxygen concentrations at the nearshore locations supported the previously collected data indicating that Tatelkuz Lake contains suitable overwintering locations for Brassy Minnow.	recommended.
	Appendix 5, Section 2.2.2 Littoral Fish and Fish Habitat	July 18, 2024	**Appendix 5, Section 2.2.4** Fish community and abundance sampling occurred in 2024. Summer fish habitat surveys and UAV mapping were not undertaken in 2024 due to wildfire activity. A total of 161 fish were captured during beach seining, which is higher than the number of fish captured by beach seining in 2022 and 2023.	**Appendix 5, Section 2.2.5** For future field programs, it is recommended that the beach seine fish sampling should only be completed when surface water temperatures are lower during the larval fish sampling timing window to reduce mortality rates by lowering physiological stress on sensitive larval fish.

5 Migratory Birds (4.5)

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

The *2024 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2025b) (Appendix 6) summarizes and presents the results of the follow up programs and monitoring of mitigation measures during 2024. This follow-up program includes monitoring for migratory bird species required by condition 4.5 of the DS is sections 3.6 (raptors), 3.7 (waterbirds), and 3.8 (upland birds):

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

5.1 Monitoring and Analysis

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

Table 5-1: Summary of DS condition 4.5 follow-up monitoring (ERM, 2025b)

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendations
Pre-clearing Surveys	**Appendix 6, Section 2.1.2**	January 2024 - December 31, 2024	**Appendix 6, Appendix B-2** No active nests or cavities nests were identified during pre-clearing February through August surveys; however, the beginnings of potential nest cavity of a Black-backed Woodpecker were located on the March 22 survey, as a new hole was observed in a burnt tree, in the survey area for stream 668. Both male and female were observed in the vicinity of the cavity, but were never observed entering or using it, or displayed nesting behaviour. This area was never logged after the first sweep. This cavity location was checked again on a second sweep on April 23, and again no Black-backed Woodpecker or other species were using the cavity. **Appendix 6, Appendix B-3** Pre-clearing surveys for breeding birds and stick nests were carried out on May 20-21, 2024. None were identified during these surveys. **Appendix 6, Appendix B-4** Crews conducted surveys and bird nest monitoring over 140 days between April 28 and September 15, 2024. No surveys were conducted between July 21 and August 1 following a site wide evacuation due to a wildlife in the immediate area. From April 15 to September 15, 2024, 30 bird species were identified within the Project foodprint as confirmed breeding birds. 89 nests were documented during pre-clearing surveys.	**Appendix 6, Appendix B-2** Recommendation, if possible, to retain the feature and surrounding burned trees if safe to do so.
	Appendix 6, Section 2.2.2 Habitat loss (ERM, 2025b)	N/A	**Appendix 6, Section 2.2.3** There is no overlap between the reporting period clearing limits and short eared owl suitable habitat.	
Raptors	**Appendix 6, Section 2.3.3.1** Incidental observations (ERM, 2025b)	January 2024 – December 2024 (ERM, 2025b)	**Appendix 6, Section 3.7.3.1** In total, 192 observations from five raptor species were incidentally recorded during the 2024 WMMP wildlife compliance monitoring field season, 81 were observed during the field compliance programs and 111 were observed in images captured during the wildlife camera monitoring programs. Thirteen individuals were unknown species. Approximately 82% of incidentally observations were during the spring, summer, and fall waterbird surveys, this included 27 bald eagle, 16 norther harrier, seven red-tailed hawk, three osprey, one unspecified eagle species, and 12 unspecified raptor species The remaining individuals included seven red-tailed hawk, six common raven, and two bald eagle. (ERM, 2025b) Cameras deployed in the 2024 baseline caribou offsetting wildlife use monitoring, site wildlife monitoring, and grizzly bear use of kokanee spawning streams monitoring programs detected 111 individuals from four raptor species. Two incidental observations were of unspecified owl species, and one was of an unspecified raptor species. Observations included 54 bald eagle, 49 common raven, three American kestrel, and two great grey owl. Approximately 41% of the bald eagle observations were of individuals fishing or earing fish from the spawning streams.	

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendations
			The most frequently observed species during the field season and by remote cameras were bald eagle, accounting for 43% (n = 83) of all raptor observations, and common raven, accounting for 28% (n = 55) of all raptor observations. No raptor species of conversation concern were incidentally observed. No incidental raptor observations or detections were recorded by Mine personnel in the Blackwater Wildlife Sighting Log in 2024.	
Waterbirds	**Appendix 6, Section 2.2.2** Habitat loss (ERM, 2025b)	N/A	**Appendix 6, Section 2.2.3**Between January and December 2024, habitat loss for Greater Yellowlegs (*Tringa melanoleuca*) was 177 ha. During the same period habitat loss for the Wilson's Snipe (*Gallinago delicata*) was 82 ha.	
	Appendix 6, Section 2.4 Facility waterbody monitoring (ERM, 2025b)	January 2024 – December 2024	**Appendix 6, Section 2.4** The WMP was the only pond constructed and operational in 2024, as a result facility water structure monitoring was only completed for the WMP in 2024. Construction of additional facility water structures was continued in 2024, but no other structures were filled by the end of 2024, and as a result no monitoring was established for those ponds in 2024.Camera deployment, visual amphibian surveys, and water quality monitoring will be implemented as required in 2025 for all additional facility water structures as they are constructed and filled. **Appendix 6, Section 2.4.3.2** One wildlife camera was deployed at the WMP on April 29, 2024, and was programmed to capture timed and motion-triggered photos to determine wildlife usage, focussing on birds and furbearers. Analysis was completed for camera data collected from April 20 to May 7, 2024, and from October 10 to November 21, 2024, due to various issues causing the camera to stop working or the data to be unrecoverable. As a result, the number of functional days, representing camera effort, for the camera deployed at the WMP in 2024 was 41. No wildlife was recorded during the functional period of the WMP camera. (ERM, 2025b)	

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendations
	Appendix 6, Section 3.8.2.1 Waterbird population monitoring (ERM, 2025b)	May 12 – 14, 2024 (Spring pair) (ERM, 2025b) July 16 – 19, 2024 (Summer brooding) (ERM, 2025b) September 10 – 12, 2024 (Fall migration) (ERM, 2025b)	**Appendix 6, Section 3.8.3.1** Surveys detected a total of 24 species and 3,215 individuals from 7 waterbird groups: dabbling ducks (species =6; individuals - 747), diving ducks (species = 7; individuals = 1,891), geese and swans (species = 3; individuals = 91), gulls and terns (individuals = 79), loons and grebes (species = 5; individuals = 197), riverine birds (species = 1; individuals = 2), and shorebirds (individuals = 112), and other birds (species = 2; individuals = 74). Twelve unspecified species were also recorded during surveys. Four species of conservation concern, American white pelican (n = 5), surf scoter (n = 25) horned grebe (n = 3) and western grebe (n = 9), were identified during the 2024 surveys. The most commonly observed species were ring-necked duck (n = 739), mallard (n = 498), bufflehead (n = 344), and common goldeneye (n = 222). Waterbird groups were detected in varied habitat types including pond, lake, wetland, river, creek, sedge meadow, and other. Waterbirds were detected primarily in lakes (57%) followed by ponds (21%) and wetlands (16%). (ERM, 2025b)	
	Appendix 6, Section 2.3.3.1 Incidental observations (ERM, 2025b)	N/A	**Appendix 6, Section 3.8.3.2** In 2024, 709 individual waterbirds from 14 species were incidentally observed. The most commonly observed incidental waterbird species were common merganser (n = 240) and sandhill crane (n = 207). Great blue heron (n = 105) was the only species of conservation concern that was observed incidentally, all observations were from the grizzly bear use of kokanee spawning streams camera monitoring program. In total, nine American green-winged teals and one American dippers were incidentally recorded along natural streams by Mine personnel in the Blackwater Sighting Log in 2024.	
	Appendix 6, Section 2.2.2 Habitat loss (ERM, 2025b)	2024	**Appendix 6, Section 2.2.3** In 2024, habitat loss for interior forest birds was 202 ha.	
Upland Birds	**Appendix 6, Section 3.9.2.1** Upland bird population monitoring	June 2024	**Appendix 6, Section 3.9.3.1** A total of 237 individual upland birds were recorded across 25 species and three unknown species. The most commonly observed species were yellow-rumped warbler (n = 53), dark-eyed junco (n = 47), American robin (n = 22), varied thrush (n = 16), and pine siskin (n = 11). Olive-sided flycatcher (n = 4) and pileated woodpecker were the only upland bird species at risk recorded. (ERM, 2025b)	
	Appendix 6, Section 3.9.2.2 Common nighthawk monitoring	June 15 – June 25, 2024 June 25 – July 14, 2024	**Appendix 6, Section 3.9.3.2** A total of 20 ARUs were deployed, 10 of which were deployed from June 15, 2024 to June 25, 2024 and 10 of which were deployed from June 25, 2024 to	

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendations
			July 14, 2024. ARUs were deployed within suitable breeding habitat to detect the presence of common nighthawk at 13 control and seven impact sites. A total of 10 common nighthawk detections from two ARUs were observed after cluster analysis and manual vetting. All detections were of common nighthawk calls and occurred within the control zone at two different sites. Unit CONI ARU 18, comprised 90% of detections (n = 9) while the remaining were from unit CONI ARU 4 (n = 1). (ERM, 2025b)	
	Appendix 6, Section 3.9.2.4 Clark's nutcracker monitoring (ERM, 2025b)	June 14 – 18, 2024	**Appendix 6, Section 3.9.3.4** A total of 147 Clark's nutcracker call playbacks were completed along 10 transects from June 14 and June 18, 2024, with three call playbacks played per each of the five survey sites per transect. Call playback (CPB) surveys detected a total of 15 Clark's nutcracker replies from 50 survey sites and all responses occurred in the Mt. Davidson whitebark pine Critical habitat in the impact zone. (ERM, 2025b)	
	Appendix 6, Section 3.9.2.3 Swift and swallow monitoring (ERM, 2025b)	June 11 – 24, 2024	**Appendix 6, Section 3.9.3.3** A total of 25 sites were surveyed for barn swallows around the mine site infrastructure. No other suitable nesting buildings were found in the LSA or in accessible areas of the RSA. Two species of swallow were observed, including barn swallow (n = 25) and tree swallow (n = 34). Activity was primarily associated with or near buildings with vaulted roof covers supported by wooden beams. (ERM, 2025b)	
	Appendix 6, Section 2.3.3.1 Incidental observations (ERM, 2025b)	N/A	**Appendix 6, Section 3.9.3.5** An additional 129 individual upland birds from 28 species were incidentally observed during the 2024 field season. Nearly all of the incidental observations were made outside of the survey time during the upland bird population monitoring (68%) and during Clark's nutcracker call playback surveys (10%). The most commonly observed bird species were dark-eyed junco (n = 17), ruby-crowned kinglet (n = 13), yellow-rumped warbler (n = 11), and American robin (n = 11). The only upland bird species of conservation concern that was incidentally observed were the olive-sided flycatcher (n = 2) and pileated woodpecker (n = 1). A hairy woodpecker nest was incidentally located north-west of the ore body while deploying ARUs for common nighthawk monitoring and in total, one mountain bluebird, bone grey-crowned rosy finch and one barn swallow nest were incidentally recorded by Mine personnel in the Blackwater Wildlife Sighting Log in 2024. (ERM, 2025b)	

6 Wetlands (5.5)

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

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

The *2024 Wetland Annual Report* (ERM, 2025c) (Appendix 7) has been developed to summarize activities undertaken with this follow-up program.

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

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

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

6.1 Monitoring and Analysis

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

Table 6-2: Summary of DS condition 5.5 follow-up monitoring (ERM, 2025c)

Monitoring	Survey/Methodology	Dates	Results Summary	Adaptive Management/Recommendations
Wetland Mitigation	**Appendix 7, Section 3.1**	**Appendix 7, Section 3.1**	**Appendix 7, Section 3.1** BW Gold implemented mitigation measures and best management practices of avoidance, minimization and restoration for wetlands in Year -1 (2024). Invasive plant mechanical control occurred within the 30-metre buffer of undisturbed vegetation surrounding wetlands at the Mine site in Year -1 (2024).	**Appendix, Section 6** Continue implementation/record of mitigation measures. Implement additional mitigation measures as described in section 5, Adaptive Management. Continue implementation/record of 30-metre buffer.
Wetland Offsetting	**Appendix 7, Section 3.4**	**Appendix 7, Section 3.4**	**Appendix 7, Section 3.4** Wetland restoration, enhancement, or creation activities were not completed at offsetting sites in Year -1 (2024) for any of the offsetting sites; however, consultation with Indigenous groups on identifying offsetting sites continued.	**Appendix 7, Section 6** Continue consultation with LDN and UFN to identify potential alternative offsetting sites. Consider progressing active wetland restoration/enhancement as described in the WMOP.
Change to Wetland Function and Loss at the Mine	**Appendix 7, Section 3.5**	**Appendix 7, Section 3.5**	**Appendix 7, Section 3.5** Clearing activities to date (2024) have resulted in 28.04 ha of direct loss in wetland extent and 770 in Functional Area (FA), a representation of wetland function, loss in the Mine Area, including bogs, fens, marshes, swamps, and shallow open water. Blue-listed communities impacted to date include 13.09 ha of Ws07 Spruce – Common Horsetail – Leafy Moss swamp, 0.09 ha of Wf13 Narrow-leaved cotton-grass – Shore Sedge fen, and 0.000025 ha of Wb13 Shore Sedge – Buckbean – Peat-moss bog. Wetland function as-built loss to date exceeds predicted cumulative loss at the schedule (Year -1) by 226 FA (34%); however, represents 28% of the total of the predicted wetland loss for the Year 23 Full-Build Out Footprint. Wetland extent loss to date exceeds predicted cumulative loss at the schedule by 5.10 ha (22%); however, represents just 25% of the total of the 113.71 ha predicted wetland loss for the Year 23 Full-Build Out Footprint.	**Appendix 7, Section 5 and 5.1** This triggers a “medium level” response for wetland extent and a “high level” response for wetland function in accordance with the trigger action response plan. Responses to these triggers are included a follow-up investigation reflected in Section 5-1. Recommendations include: - Continue monitoring. - Update/reconcile predicted footprints and losses at the schedule to reflect updated clearing plans. Based on the follow-up investigation results, BW Gold does not anticipate exceeding wetland loss beyond what was predicted in the WMOP at the maximum extent of disturbance, despite being temporally ahead of the schedule. Annual monitoring through the submission of the WMOP Annual Report will confirm these predictions. Despite being ahead of the construction schedule, wetland extent is net positive with extent gains to date exceeding losses by 444.94 ha (16.9:1 gains to losses), and wetland function is net positive with FA gains to date exceeding losses by 3,664 FA (4.6:1 gains to losses).
Change to Wetland Function and Loss at the Offsetting Sites	**Appendix 7, Section 3.6**	**Appendix 7, 3.6**	**Appendix 7, Section 3.6** Wetland function gains to date at Mathews Creek Ranch for restoration are from passive restoration (453 FA); however, no active wetland restoration gains have been realized. No wetland function gains to date at Dykam Ranch for enhancement or conservation have been realized since baseline surveys at Dykam Ranch have not been completed to accurately assess wetland function. Wetland gains as a result of conservation have been achieved for Mathews Creek Ranch through BW Gold’s securement of fee-simple ownership (224.99 ha) and Dykam Ranch through BW Gold’s securement of a 99-year statutory right of way and license agreement (248 ha).	**Appendix 7, Section 6** Continue monitoring.

7 Country Foods (6.11) (6.13)

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

The *2024 Country Foods Monitoring Plan Annual Report* (Entia Environmental Consultants Ltd., 2025) (Appendix 8) has been developed to summarize activities under the CFMP.

Supplementary to the CFMP is the *Country Foods and Scio-economic Conditions Follow-Up Program* (Blackwater Gold Ltd, 2022b), which was developed to address condition 6.13 of the DS. This program is intended to monitor and adaptively manage potential adverse effects on the socio-economic conditions of Indigenous groups as a result of changes to access, availability, and quality of country foods due to the Mine components and activities. The *2022 Country Foods and Socio-economic Conditions Follow-up Program: Current Conditions Report* (ERM, 2025d) has been developed to understand baseline conditions and provide context for identifying change, this document remains in draft as the efforts to engage with LDN and UFN continue.

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

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

Condition No.	Condition	Appendix	Section
6.11.	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the health of Indigenous Peoples caused by changes in concentrations of contaminants of potential concern in water, soil, vegetation and wildlife, including fish, and determine the effectiveness of mitigation measures. As part of the development of the follow-up program, the Proponent shall identify the vegetation and wildlife species that shall be monitored, the locations where the monitoring will be conducted, the contaminants to be monitored and the frequency of the monitoring. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. In doing so, the Proponent shall:	Country Foods Monitoring Plan (Blackwater Gold Ltd, 2022a)	
6.11.1	Monitor, prior to construction, contaminants of potential concern in soil, vegetation, wildlife, including fish and water. The Proponent shall also co-locate soil sampling with vegetation samples and water sampling with fish samples;	Appendix 8-1: 2024 Country Foods Monitoring Plan Annual Report	1.1 Background
6.11.2	Monitor, during all phases of the Designated Project, contaminants of potential concern in water, soil, vegetation, and wildlife species;		3.0 Sampling under the CFMP in 2023-2024
6.11.3	If the sampling and monitoring results referred to in condition 6.11.1 and 6.11.2 exceed the predictions made during the environmental assessment, implement any modified or additional mitigation measures pursuant to condition 2.9 based on the results of the follow-up program and update the human health risk assessment identified by the Proponent in Appendix 9.2.2A of the Environmental Impact Statement using the results of the sampling and monitoring. The Proponent shall integrate the current and predicted consumption patterns of each Indigenous group identified during the environmental assessment in the updated human health risk assessment and any updated consumption pattern information provided by Indigenous groups as part of the follow-up program.		3. Data Analysis and Interpretation
6.13	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the socio-economic conditions of Indigenous Peoples as a result of changes to access, availability and quality of country foods. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.	Country Food and Socio-economic Conditions Follow-Up Program Appendix 8-2: 2024 Annual Monitoring Report Country Foods Socio-economic Conditions Follow-up Program (DS 6.13)	

7.1 Monitoring and Analysis

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

Table 7-2: Summary of DS condition 6.11 follow-up monitoring (Entia Environmental Consultants Ltd., 2025)

Monitoring	Survey/Methodology	Dates	Results Summary	Adaptive Management/Recommendations
Surface Water Quality	**Appendix 8, Section 3.4**	January – March 2024	**Appendix 8, Section 4.5** Surface water quality was monitored between January and December 2023 at Davidson Creek, Creek 661, Turtle Creek, Chedakuz Creek, Creek 705, Fawnie Creek, Tatelkuz Lake and Kuyakuz Lake. Parameters analyzed in surface water quality included 18 COPCs as well as additional physical parameters, general chemistry parameters (e.g., hardness), ions, and a full suite of total and dissolved metals. Average concentrations of metals in surface water were below Guideline NPMs for water quality. Except for total aluminum and iron, average concentrations of metals were below the Baseline and Predicted NPMs. Based on statistical Before-After Control-Impact (BACI) analysis, the change in aluminum and iron concentrations at impact sites was significantly different to changes at control sites. Changes in the mean concentration were likely driven by a few samples with high concentrations in Davidson Creek and Creek 661. It is unlikely that these infrequent high concentrations are indicative of Mine-related changes to water quality because they occurred in Creek 661, which did not receive Mine-related discharge or seepage during the monitoring period, and because higher concentrations in Davidson Creek started occurring prior to commencement of discharge from TSF Stage 1 SCP in Q1 2024.	
Air Quality Monitoring	**Appendix 8, Section 3.1**	May – March 2024	**Appendix 8, Section 4.2** For metals in air (based on dustfall metal results combined with PM10 results), average concentrations of all parameters in 2023 were lower than the air quality Guideline NPMs. However, manganese and lead concentrations were found to be higher than the Baseline and Predicted NPMs. Statistical analysis found that changes in manganese concentrations were significantly higher at control sites (away from the mine site) than at impact sites near the mine site and changes in lead concentrations were not significantly different. Based on results of 2023-2024 monitoring, the trigger level in the adaptive management framework for air quality is “Low”. However, no specific action is recommended based on 2023 dustfall monitoring results because concentrations higher than the Predicted NPMs are likely an artefact of the methods used to estimate metal concentrations in predictive modelling for air and because changes in concentration of manganese was higher at control sites, not impact sites, which is not a Mine effect.	
Plant and Berry Quality	**Appendix 8, Section 3.3**	2023	**Appendix 8, Section 4.4** Analytical data for plant and berry samples analyzed in 2023. For berries, interpretation of the results is difficult as only two samples were obtained in 2023 because there were not many berries available for sampling (hot, dry summer). Other than arsenic in one berry sample, all metals were below the Baseline, Predicted, and Guideline NPMs for berries. The arsenic concentration in one huckleberry sample that was higher than the NPMs appears to be an outlier (an unusual result), as it is higher than any arsenic concentration measured previously and significant changes in arsenic concentrations were not found in air (dustfall), soil, or plants. Thus, based on 2023 monitoring results, the trigger level in the adaptive management framework for soil, plants, and berries is “None”.	
Fish Tissue Quality	**Appendix 8, Section 3.5**	Sampling commenced in mid-August and ended in late September 2023.	**Appendix 8, Section 4.6** For fish tissue, average concentrations were lower than Baseline, Predicted, and CF Guideline NPMs for fish tissue. Thus, based on 2023 monitoring results, the trigger level in the adaptive management framework for fish tissue is “None”.	
Small Mammal Tissue Quality	**Appendix 8, Section 3.6**	September 2023	**Appendix 8, Section 4.7** Sampling of small mammals in 2023 was completed to provide baseline or pre-Operations phase data on tissue concentrations of COPCs, as a foundation for future monitoring. There are no human health-based NPMs based on rodent tissue sampling.	

Table 7-3: Table 7 2: Summary of DS condition 6.13 follow-up monitoring (ERM, 2025d)

Monitoring	Survey/Methodology	Dates	Results Summary	Adaptive Management/Recommendations
Country Food Access	**Appendix 8-2, Section 2.4** Change of access to harvesting area(s) due to spatial overlap or intersection with FUP monitoring area	**Appendix 8-2, Section 2.4**	**Appendix 8-2, Section 2.4** In the reporting year, a change in access to plants and berries as well as to some game harvesting areas may have occurred due to wildfires, and BW Gold will remained alert to any input received from Indigenous groups regarding any additional influence the Mine has on access routes considering the wildfire impacted areas. Based on available information, there is no evidence that construction activities of the Mine in 2024 have resulted in a change for land users to access country foods harvesting areas. The monitoring findings are aligned with the predicted effect from the environmental assessment.	**Appendix 8-2, Section 2.4** None.
	Appendix 8-2, Section 2.4 Change in effort (time, expense and risk) required to access alternate harvesting areas	**Appendix 8-2, Section 2.4**	**Appendix 8-2, Section 2.4** There is no evidence that the level of effort associated with accessing harvesting areas has changed due to the activities of the Mine in 2024. External conditions (e.g., inflation and the cost of gas) changed between 2022 and this monitoring year, however there is no indication that these external factors influenced the effort to access harvesting areas. The monitoring findings are aligned with the predicted effect from the environmental assessment.	**Appendix 8-2, Section 2.4** None.
Country Food Availability	**Appendix 8-2, Section 2.4** Change in availability of country foods	**Appendix 8-2, Section 2.4**	**Appendix 8-2, Section 2.4** The 2023 wildfire may have reduced the availability of plants and berries in this monitoring year. However, this change is not associated with the construction activities of the Mine. Invasive species were not reported for displacing native plant species that serve as country foods. BW Gold did not receive information from Indigenous groups regarding changes to plant/berry availability due to the Mine. Vehicles/driving associated with the Mine resulted in two wildlife injuries and one fatality. The proponent had anticipated there could be vehicle-wildlife strikes due to the development and operations of the mine, and the federal government predicted such impacts would not result in a significant adverse effect to wildlife. Notwithstanding vehicle-wildlife incidents may have contributed to a reduced availability of wildlife (moose) for harvesting. BW Gold has not received information from Indigenous groups regarding the impact of such incidents to the availability of country foods (hunted) species. The monitoring results are aligned with the predicted effect from the environmental assessment.	**Appendix 8-2, Section 2.5** As a result of the three collisions by vehicles from the Mine, a “medium” level threshold is. BW Gold has taken steps to address the occurrences of vehicle-wildlife collisions, such as speed monitoring, installing wildlife crossing signs, and completing an assessment of the Kluskus FSR to identify key wildlife corridors. In consideration of the one trigger and the knowledge that BW Gold has implemented adaptive management measures prompted by the WMMP monitoring, no additional adaptative management measures are recommended in relation to FUP monitoring.
Country Foods Quality	**Appendix 8-2, Section 2.4** Change in quality of country foods	**Appendix 8-2, Section 2.4**	**Appendix 8-2, Section 2.4** No tissue samples for wildlife species were collected in 2024 and no engagement or feedback has been provided to BW Gold regarding the quality of wildlife/game. The absence of this information does not allow BW Gold to determine any changes to the quality of hunted wildlife. While there have been some changes in the concentrations of plant and berry samples, these changes were not attributed to the Mine, and as such, it is determined that the Mine did not affect the quality of harvested plants or berries. Although there was an increase in COPC measured in surface water in 2024, these remained below the Guideline NPMs and no risk to human health was been identified. There was no evidence from fish tissue sampling that the Mine’s activities have altered the quality of fish. The monitoring results are aligned with the predicted effect from the environmental assessment.	**Appendix 8-2, Section 2.5** Monitoring results of the CFMP in 2024 indicated that surface water COPC concentrations were higher than Baseline and increasing in a manner not predicted by the Surface Water Quality Model. As a result of the changes to the surface water quality, a “medium” trigger is identified. No changes in quality are reported for any of the country foods categories (i.e. quality of plants, berries, or aquatic species). Further, the COPC concentrations remain below Guideline NPMs and do not pose a risk to human health. Additionally, the Mine has not received complaints or concerns from Indigenous groups regarding changes to the quality of country foods. Therefore, no adaptation measures are recommended in relation to the FUP monitoring, although continued monitoring of COPC surface water concentrations is recommended as part of the CFMP.

Monitoring	Survey/Methodology	Dates	Results Summary	Adaptive Management/Recommendations
Food Security	**Appendix 8-2, Section 2.4** Change in perception of food security due to change in access, availability and/or quality of country foods	**Appendix 8-2, Section 2.4**	**Appendix 8-2, Section 2.4** There is no evidence that activities at the Mine have resulted in changes to perceptions of food security due to the change in access, availability, and/or quality of country foods. Further, the province's inflation remained stable at 2.7%, indicating only modest changes in the price of goods. The monitoring results are aligned with the predicted effect from the environmental assessment.	**Appendix 8-2, Section 2.4** None.
Health	**Appendix 8-2, Section 2.4** Changes in levels of physical activity associated with country foods harvesting	**Appendix 8-2, Section 2.4**	**Appendix 8-2, Section 2.4** There is no evidence that Mine activities have been associated with changes in accessing local harvesting areas, and as such, changing the approach to harvesting or levels of physical activity associated with country foods harvesting. The monitoring results are aligned with the predicted effect from the environmental assessment.	**Appendix 8-2, Section 2.4** None.
Culture	**Appendix 8-2, Section 2.4** Change in culture due to changes in country foods harvesting associated with Project activities, components or effects	**Appendix 8-2, Section 2.4**	**Appendix 8-2, Section 2.4** There is no evidence that Mine activities have caused changes in culture associated with country foods harvesting and the relationship of harvesting with knowledge sharing or language use. The monitoring results are aligned with the predicted effect from the environmental assessment.	**Appendix 8-2, Section 2.4** None.

8 Air Quality (6.12)

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

> **6.12** The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the health of Indigenous Peoples as a result of changes to air quality and determine the effectiveness of mitigation measures. As part of the implementation of the follow-up program, the Proponent shall monitor nitrogen dioxide (NO2), sulfur dioxide (SO2), fine particulate matter (PM2.5), particulate matter (PM10), dust, and carbon monoxide (CO) in air. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.

The *Air Quality and Fugitive Dust Management Annual Report 2024* (Blackwater Gold Ltd., 2025b) (Appendix 9) presents the results of the 2024 monitoring program.

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

8.1 Monitoring and Analysis

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

Table 8-1: Summary of DS condition 6.12 follow-up monitoring (Blackwater Gold Ltd., 2025b)

Monitoring	Survey/Methodology	Dates	Results Summary	Adaptive Management/Recommendations
Particulate Matter Monitoring	**Appendix 9, Section 2.4.2**	January – December 2024	**Appendix 9, Section 2.4.3** Between April 18 and August 13, 2024, the Partisol $PM_{2.5}$ exceeded the Permit and TRP medium trigger level four times and the Partisol PM_{10} exceeded eight times. The late summer exceedances are attributed to the onsite and nearby wildfires. Water trucks were frequently requested based on visual observations, it was noted that there was limited usage of the dust observation log.	**Appendix 9, Section 7** Purple Air monitors were added to the program to support improved delineation of mine impacts vs other potential sources (e.g.: wildfire), in May 2024. Through the entirety of 2024 the QR code associated with the dust observation log, and training on its use was provided as part of site orientation. However, the lack of reports, indicated a lack of awareness on the data collection process. In response to this observation, additional training was provided via tool box meetings by the Environment Team to the Earthworks crews, and it was included as part of the safety topic/newsletter thing. This process will be revisited in 2025.
Nitrogen dioxide and Sulfur Dioxide Monitoring	**Appendix 9, Section 2.5.1**	December 2023 – December 2024	**Appendix 9, Section 2.5.1.1** In total 53 samples were collected between December 26, 2023 and December 31, 2024, with the highest SO_2 concentration of 0.37 parts per billion (ppb; all other sample concentrations were below their 1 ppb detection limit) and highest NO_2 concentration of 6.0 ppb both observed between February 19 to March 5, 2024. The 7-day results do not directly compare to the 1-hour standards and objectives due to the difference in time measurement, and it is important to note that the results were well below the annual average standard and objective (17 ppb for NO_2 and 5 ppb for SO_2). With NO_2 averaging 1.63 ppb and SO_2 below the 1 µg/sample detection throughout the year except for the February 19 to March 5 sample (0.37 ppb).	
Carbon monoxide	**Appendix 9, Section 2.5.2**	January – December 2024	**Appendix 9, Section 2.5.2.1** The results of the CO monitoring using the MSA Altair 4XR were conducted between January and November, 2024. The CO concentrations were generally 0 ppm, with the exception of 1 ppm concentration observed at Main Camp by Old Fueling Station on January 19, 2024. The analytical results from Passam Ag are reported as concentrations using actual volume. The CO results were all non-detect (< 500 µg/m^3). As outlined in the AQFDMP, normally CO monitoring would not be recommended for such low levels; however, it is a requirement of the DS Condition 6.12. It should be noted that the results are not directly comparable to the referenced objectives due to difference in time measurements; however, the non-detect concentrations are well below the 1-hour and 8-hour objectives.	**Appendix 9, Section 7** A review of the CO monitoring program included research for a passive CO monitoring method occurred in 2024.

9 Effects on Moose (6.14)

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

The *2024 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2025b), (Appendix 6) summarizes and presents the results of the follow up programs and monitoring of mitigation measures during 2024. This follow-up program includes monitoring for moose required by condition 6.14 of the DS in Section 3.1.

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

9.1 Monitoring and Analysis

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

Table 9-1: Summary of DS condition 6.14 follow-up monitoring (ERM, 2025b)

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendations

Moose	**Appendix 6, Section 2.2**
	Habitat Loss
		January 2024 – December 2024	**Appendix 6, Section 3.3**
			Between January 2024 and December 2024, the following moose habitat loss occurred:
			- Growing:
			  o 211 ha
			- Winter:
			  o 236 ha
				Appendix 6, Section 4
				
				None.

	Appendix 6, Section 2.3.3 Moose-vehicle collision monitoring	N/A	**Appendix 6, Section 2.3.4.3** Seven vehicle related wildlife incidents were reported in 2024. Vehicle related incidents that involved Mine personnel included: • One vehicle collision occurred on March 10, 2024, when a truck driver hit a cow moose at KM19.5 of the Kluskus FSR. The collision resulted in the fatality of the cow moose and minor damage to the truck. • One vehicle collision occurred on April 23, 2024, when a truck driver hit a cow moose between KM 84 and KM 85 of the Kluskus FSR. The moose was not seen on the side of the road, but blood and hair found on the truck suggest the moose sustained injuries. • One vehicle collision occurred on August 15, 2024, when a light vehicle driver hit a calf moose at KM 464 of the Kluskus FSR. The calf was injured on the side of the road when the driver called a conservation officer. By the time the officer arrived the calf had moved off the side of the road. An attempt was made to find the injured calf, but it was not found. Mitigations in place to reduce the risk of vehicle-wildlife collisions include speed limits, signage at potential crossings, and reporting of incidental sightings.	**Appendix 6, Section 2.3.5** Speed monitoring was complete along the Kluskus FSR in April, May, October, and November 2024. Immeadiate corrective actions associated with this monitoring included immediate dismissal for site personnel travelling >20 km over the speed limit or disobeying traffic laws and issuing a warning to personnel travelling between 10 and 19 km over the speed limit. An assessment of the Kluskus FSR to identify key wildlife corridors where wildlife crossing signs will be installed is planned for 2025. Information bulletins will be issued site wide during the shoulder season, highlighting measures to avoid vehicle/wildlife encounters.
	Appendix 6, Section 3.1.2.1 Ungulate pellet counts	June 2024	**Appendix 6, Section 3.1.3.1** In total, 26 ungulate pellet count transects were surveyed at varying distances from the propoMine footprint from June 6 to 14, 2024. Ten sample points were completed along each transect, with a total of 260 sample points completed. Moose pellets were recorded at 88.5% of transects, (n = 23 transects) and were mostly winter pellets (n = 88 pellet groups), with some spring pellets (n = 15 pellet groups), summer pellets (n = 22 pellet groups) and fall pellets (n=7 pellet groups). Deer pellets were detected at 26.9% of transects (n = 7 transects). No caribou pellets were observed. Data collection for this program is ongoing (first five years of operation). It is anticipated that sufficient data will be available following 2025 monitoring activities to support power analysis.	**Appendix 6, Section 4** None.

	Appendix 6, Section 3.1.2.2 Snow Track Surveys (Ground surveys)	March 7, 2024	**Appendix 6, Section 3.1.3.2** Aerial snow track surveys were completed on March 7, 2024 with 30 aerial transects totaling 555 km of survey effort. In total, 298 moose tracks and 31 unspecified deer tracks were recorded. Additionally, 8 individual moose and two moose beds were recorded. No Caribou tracks were recorded. Moose tracks were recorded along 100% of transects. Generally, tracks were distributed evenly across the study area with the exception of the southwestern portion of the study area, near Mount Davidson, which had fewer tracks. Data collection for this program is ongoing (first five years of operation). It is anticipated that sufficient data will be available following 2025 monitoring activities to support power analysis.	**Appendix 6, Section 4** None.

10 Effects on Caribou (8.18.6)

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

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

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

The *2024 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2025b), (Appendix 6) summarizes and presents the results of the follow up programs and monitoring of mitigation measures during 2024. This follow-up program includes monitoring for caribou required by condition 8.18.6 of the DS in Section 3.2.

10.1 Monitoring and Analysis

As outlined above, details regarding the 2024 monitoring activities done in support of condition 8.16.8 are provided in Appendix 6. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 10-1 below summarizes the monitoring results and recommendations and identifies where further information on each item can be found in the Appendix.

Table 10-1: Summary of DS condition 8.18.6 follow-up monitoring (ERM, 2025b)

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendations

Caribou	**Appendix 6, Section 2.2**
	Habitat Loss
		January 2024 – December 2024	**Appendix 6 Section 2.2.3**
			Between January 2024 and December 2024, the following caribou habitat loss occurred:
			- Spring:
			  o 213 ha
			- Summer/Fall:
			  o 243 ha
			- Winter:
			  o 222 ha
				Appendix 6, Section 4
				
				None.

	Appendix 6-1, Section 3.1.2.1 Ungulate pellet count surveys	June 2024	**Appendix 6, Section 3.1.3.1** In total, 26 ungulate pellet count transects were surveyed from June 6 to 14, 2024, this work occurred prior to the 2024 Wildfires Ten sample points were completed along each transect, with a total of 260 sample points completed. No caribou pellets were observed.	**Appendix 6, Section 4** None.
	Appendix 6, Section 3.1.2.2 Snow Track Surveys (Ariel surveys)	March 7, 2024	**Appendix 6, Section 3.1.3.2** Ariel snow track surveys were completed on March 7, 2024, with 30 aerial transects totaling 555 km of survey effort. No caribou tracks were observed	**Appendix 6, Section 4** None.
	Appendix 6, Section 3.2.2 Caribou offset monitoring program	N/A	**Appendix 6, Section 3.2.2** The caribou offset monitoring program consists of four separate monitoring programs: road restoration monitoring, access monitoring, sight lines monitoring, and wildlife use monitoring. The caribou offset monitoring program had not yet begun in 2024. However, baseline camera monitoring in the two proposed caribou offset areas (Johnny Lake and Capoose) started in October 2021 to provide baseline data on wildlife use is presented in this report. Monitoring sites were chosen based on sign and habitat for focal mammals (caribou, moose, bear, and wolf) and do not align with the final monitoring locations required for the caribou habitat wildlife use monitoring program. This data is part of the baseline monitoring program that will inform the final program.	**Appendix 6, Section 4** None.
	Appendix 6, Section 2.3.3.1 Incidental Observations	July 12, 2024	**Appendix 6, Section 3.2.3.2** One caribou antler was incidentally recorded by Mine personnel in the Blackwater Wildlife Sighting log in 2024. The antler was identified near transmission line Structure 456 while completing a bird nest survey. The antler was cracked and worn and is presumed to not be a recent shed.	**Appendix 6, Section 2.3.5** None.

11 Whitebark Pine (8.20.5)

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

The overall goals of the WPMP are to:

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

Although reclamation has not began at site (Section 1.1), the *BW Gold Whitebark Pine 2024 Update* (Moody Trees, 2025) (Appendix 10) summarizes implementation of the WPMP, while the *2024 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2025b) (Appendix 6-1) presents results relating to monitoring the baseline presence of the Clark's nutcracker. No additional monitoring occurred between January 1 and March 31, 2024. The results of these programs will be used to inform the analysis of future monitoring during reclamation activities.

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

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

Condition No.	Condition	Appendix	Section
8.20.5	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, a whitebark pine management plan to mitigate effects from the Designated Project on whitebark pine (*Pinus albicaulis*) and its critical habitat. The Proponent shall implement the plan during all phases of the Designated Project consistent with any applicable recovery strategy related to whitebark pine (*Pinus albicaulis*). As part of the whitebark pine management plan, the Proponent shall… develop and implement a follow-up program in consultation with Indigenous groups to determine the effectiveness of the mitigation measures included in the whitebark pine management plan. The Proponent shall apply conditions 2.9 and 2.10 when implementing the follow-up program. The follow-up program shall include:	Described in the WPMP (ERM, 2022b)	
8.20.5.1	Visual monitoring of populations of whitebark pine (*Pinus albicaulis*), including their health, within reclaimed areas at a minimum every five years; and	Appendix 10: *BW Gold Whitebark Pine Update 2024*	Section Stand Enhancement Activities
8.20.5.2	Monitoring of use of the reclaimed areas by Clark's nutcracker (*Nucifraga columbiana*) for the purpose of whitebark pine regeneration. Should the results of monitoring demonstrate that use of the reclaimed areas by Clark's nutcracker (*Nucifraga columbiana*) is not adequate, the Proponent shall implement additional mitigation measures.	Appendix 6: *2024 Wildlife Mitigation and Monitoring Program Compliance Report*	Section 3.9.3.4 Clark's Nutcracker Monitoring

11.1 Monitoring and Analysis

As outlined above in Table 11-1, details regarding the monitoring activities done in support of condition 8.20.5 are provided in Appendix 10. These programs were implemented and developed by QPs, and include detailed summaries of methodologies, study locations, results and recommendations. Table 11-2 below summarizes the monitoring results and recommendations and identifies where further information on each item can be found in the Appendices. For context, Table 11-1 summarizes all monitoring done through the WPMP in 2023, which addresses requirements outside of DS condition 8.20.5.

Table 11-2: Summary of DS condition 8.20.5 follow-up monitoring (Moody Trees, 2025)

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendations
Whitebark Pine	**Appendix 10, White Pine Blister Rust Screening Planting**	2024	**Appendix 10, Stand Enhancement Activities** Planting trials of reclaimed roads and drill pads were re-measured with 8-year survival exceeding 80%.	**Appendix 10, 2024 Workplan** Apply verbenone to plus trees to minimize losses of reproductive trees to mountain pine beetle following First Nation consultation to deploy treatment. Develop restoration prescriptions. Daylight whitebark pine to reduce competition levels and support current and future cone production.
	Appendix 6, Section 3.9.2.4 Clark's nutcracker monitoring (ERM, 2025b)	June 14 – 18, 2024	**Appendix 6, Section 3.9.3.4** A total of 147 Clark's nutcracker call playbacks were completed along 10 transects from June 14 and June 18, 2024, with three call playbacks played per each of the five survey sites per transect. Call playback (CPB) surveys detected a total of 15 Clark's nutcracker replies from 50 survey sites and all responses occurred in the Mt. Davidson whitebark pine Critical habitat in the impact zone. (ERM, 2025b)	

12 Effects on Western Toad (8.21)

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

The 2024 *Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2025b) (Appendix 6) summarizes and presents the results of the follow up programs and monitoring of mitigation measures during 2024. This follow-up program includes monitoring for western toad required by condition 8.21 of the DS in Section 3.9.

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

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

Condition No.	Condition	Appendix	Section
8.21.	The Proponent shall develop, in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of the mitigation measures as it pertains to the effects of changes caused by the Designated Project on western toad (*Anaxyrus boreas*). The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall:	Described in the WMMP (ERM, 2023a)	
8.21.1	Conduct western toad surveys annually in breeding habitat identified pursuant to condition 8.10 from the start of construction until the end of decommissioning;	Appendix 6: 2024 Wildlife Mitigation and Monitoring Program Compliance Report	3.10.2.2 Monitoring toad breeding ponds
8.21.2	Monitor western toad (*Anaxyrus boreas)* in relocation areas for western toad (*Anaxyrus boreas*) salvage conducted pursuant to condition 8.11; and	Appendix 6: 2024 Wildlife Mitigation and Monitoring Program Compliance Report	3.10.2.2 Monitoring toad breeding ponds
8.21.3	Monitor western toad (*Anaxyrus boreas*) mortality on project roads from the start of construction until the end of decommissioning.	Appendix 6: 2024 Wildlife Mitigation and Monitoring Program Compliance Report	3.10.2.1 Monitoring toad mortality on roads

12.1 Monitoring and Analysis

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

Table 12-2: Summary of DS condition 8.21 follow-up monitoring (ERM, 2025b)

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendations
Western Toad	**Appendix 6, Section 3.10.2.1** Monitoring for Toad Mortalities on Road	June 4 – June 7, 2024 September 13 and September 22, 2024	**Appendix 6, Section 3.10.3.1** Monitoring of toad mortality on roads were completed along 10 road transects in 2024 Over two survey period between June 4 to June 7 and September 13 and September 22, 2024. No amphibian mortalities were recorded during the surveys completed in 2024. However, 500 unidentified tadpoles were observed in standing water on the road in transect TOAD7 during the June survey. Although tadpoles of an unidentified amphibian specie were observed, salvage was not completed as this road is blocked by fallen trees resisting all vehicle access, and therefore, did not warrant the need for salvage. All other amphibian observations from toad mortality road surveys were away from roads, but in areas surrounding surveys roads. Suitable amphibian habitat was observed along six out of 10 transects during June surveys. Amphibians were observed during June surveys at TOAD3, TOAD4, and TOAD7, including one adult western toad at transect TOAD3. During September surveys, suitable amphibian habitat remained evident at transects three of the six transects identified with suitable amphibian habitat in June. One western toad was observed at TOAD7.	**Appendix 6, Section 4** Assess activity level of roads prior to establishing transects to align with the objectives of monitoring western toad mortality on roads.
	Appendix 6, Section 3.10.2.2 Monitoring Toad Breeding Ponds	July 12 – July 22, 2024 August 7 0 August 13, 2024	**Appendix 6, Section 3.10.3.2** 82 amphibian breeding pond surveys were completed at varying distances from the Mine foodprint from July 12 to 22, 2024, and August 7 to 13, 2024. Of the sites surveyed, 63 were classified as natural sites, and 19 were classified as man-made/disturbed sites that showed evidence of the site being impacted by Mine activities. In the impact zone, 17 sites were man-made/disturbed and 39 sites were natural. In the control zone, two sites were man-made/disturbed and 24 were natural. Amphibians were observed at 36 of the 92 sites surveys in 2024. Of the sites where amphibians were observed, 10 were man-made/disturbed sites and 24 were natural sites. Within the impact zones, amphibians were observed at 21 sites within the Mine footprint and at six sites within 500 m of the Mine footprint. In the control zone, amphibians were observed at nine sites. When sufficient post-construction data is available time series analysis will occur.	**Appendix 6, Section 4** None.
	Appendix 6, Section 3.10.3.3 Incidental Observations	January 2024 – December 2024	**Appendix 6, Section 3.10.3.3** Three western toad and one Columbia spotted frog were incidentally recorded during the 2024 WMMP wildlife compliance monitoring field season. All incidental observations of western toad occurred during the ungulate pellet count surveys, two observations occurring along the mind access road and one observation to the south-east of the LSA.	

			41 western toads and one unspecified toad species were incidentally recorded by Mine personnel in the Blackwater Sighting Log in 2024. Along Tatelkuz Lake, 40 western toads were recorded emerging from the lake moving into the forest. One western toad was recorded along C trail around KM 13 in a wetted area off the road. As no construction works were planned for that area, no salvages were completed, however, exclusion fencing was installed along the edge of the road by BWG personnel as a general mitigation measure to reduce the risk of vehicle-caused toad mortalities. Additionally, one unspecified toad species was recorded by construction near the SSE lunch trailers, this was likely a western toad as no other toad species are known to inhabit the Project area. As no construction works were planned, no salvage was completed. No salvages were completed as a result of incidental observation of amphibians in 2024.	

13 Effects on Bats (8.22)

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

The *2024 Wildlife Mitigation and Monitoring Program Compliance Report* (ERM, 2025b) (Appendix 6) summarizes and presents the results of the follow up programs and monitoring of mitigation measures during 2024. This follow-up program includes monitoring for bats required by condition 8.22 of the DS in Section 3.5.

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

13.1 Monitoring and Analysis

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

Table 13-1: Summary of DS condition 8.22 follow-up monitoring (ERM, 2025b)

Monitoring	Survey/Methodology	Timing	Results	Adaptive Management/Recommendations
Bats	**Appendix 6, Appendix B** Pre-clearing surveys	February – April 2024	**Appendix 6, Appendix B-2** Pre-clearing surveys for bat hibernacula were carried out February 14 – April 23, 2024. None were identified.	**Appendix 6, Section 4** None.
	Appendix 6, Section 3.6.2.1 Bat Distribution Monitoring	Jul7 14 – 31, July 15 – 31, August 9 – 28, August 9 – 27, 2024	**Appendix 6, Section 3.6.3.1** 20 Autonomous Recording Units (ARUs) were deployed in the summer bat season in suitable foraging habitat within 200 m of the Mine footprint (n = 10) and within 200 m-2km of the Mine footprint (n = 10). The objective of the monitoring was to collect baseline information prior to Mine operation to determine is bats will avoid the Mine during operations. After analysis of ARU files using the Kaleidoscope Pro auto-ID function and manual vetting, four species were detected with high or moderately high confidence (i.e., had many clear diagnostic calls recorded) in the 2024 monitoring area: little brown myotis, silver-haired bat, western long-eared myotis, and western small-footed myotis. Bats were detected at all 20 ARU deployment locations, with the greatest number of detections occurring at two ARUs in the impact zone and one ARU in the control zone.	**Appendix 6, Section 4** None.
	Appendix 6, Section 3.6.2.3 Bat Roosting Structures	January 2024 – December 2024,	**Appendix 6, Section 3.6.3.2** In 2024, 23 BradenBark structures were installed to monitor bat activity and use in three different habitat types: open (n = 8), mixed (n = 7), and closed (n = 8). Structures were installed at Lake 15/16 (n = 3), Wetland 9 (n = 12), and Wetland 15 (n = 7) in 2024. Six structures were installed in period years, three in the Matthews Creek Wetland offset area in September 2022 and three at Lake 15/16 on December 19, 2023 for a total of 29 structures. HOBO Roost Loggers were installed inside 10 BradenBark structures at Lake 15/16 and at Wetlands 9 and 15 in open, partial, and full cover treatment types. BradenBark structures with HOBO Roost Loggers were installed at Lake 15/16 (n = 3), Wetland 9 (n = 3), and Wetland 15 (n = 3) and in the three different habitat types: open (n = 3), mixed (n = 4), and closed (n = 3).	**Appendix 6, Section 4** None.
	Appendix 6, Section 3.6.2.4 NABAT Monitoring	N/A	**Appendix 6, Section 3.6.2.4** The initiation of the NABAT monitoring program at the Mine is anticipated to commence in 2025 following consultation with ECCC.	**Appendix 6, Section 4** None.
	Appendix 6, Section 3.6.3.3 Incidental Observations	August 2024	**Appendix 6, Section 3.6.3.3** Two incidental observations of unspecified bat species were observed during the 2024 WMMP wildlife compliance monitoring field season. Both observations occurred at BWB08 of the grizzly bear use of kokanee spawning stream monitoring programs, images included multiple individuals flying through the frame. No incidental observations or detections of bats were recorded by Mine personnel in the Blackwater Wildlife Sightings Log in 2024.	

14 References

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BC EAO. (2019a). *Assessment Report for Blackwater Gold Mine Project (Blackwater) with Respect to the Application by New Gold Inc for an Environmental Assessment Certificate pursuant to the Environmental Assessment Act, S.B.C. 2002, c.43.*

BC EAO. (2019b). *Summary Assessment Report for Blackwater Gold Mine Project (Blackwater) with respect to the application by new Gold Inc. for an Environmental Assessment Certificate Pursuant to the Environmental Assessment Act, S.B.C. 2002, c. 43.*

BC EAO. (2019c). *In the matter of the Environmental Assessment Act S.B.C., 2002, c. 43 (the Act) and in the matter of an Application for an Environmental Assessment Certificate (Application) by New Gold Inc. (Proponent) for the Blackwater Gold Project Environmental Assess.*

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Blackwater Gold Ltd. (2025c). *Air Quality and Fugitive Dust Management Plan J.1.*

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ERM. (2025d). *2024 Annual Monitoring Report: Country Foods Socio-economic Follow-up Program (DS 6.13) C.1.* Project Number: 0788606.

Moody Trees. (2025). *BW Gold Whitebark Pine 2024 Annual Report.*

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Palmer. (2023b). *Follow-up Programs for Condition 3.16 of the Blackwater Mine Project Decision Statement Issued under Section 54 of the Canadian Environmental Assessment Act, 2012.* Project Number: 2006501.

Triton. (2025a). *Follow-Up Programs for Condition 3.14 Annual Report 2024 V2.*

Triton. (2025b). *Follow Up Programs for Condition 3.16 Annual Report 2024 V2.*

Appendix 1: Summary of DS Condition Activities (2.11.1)

Appendix 2: 2024 BW Gold Consultation Report

Appendix 3: 3.14 Results Reports

Appendix 4: 3.15 Results Report

Appendix 5: 3.16 Results Reports

Appendix 6: 2024 Wildlife Mitigation and Monitoring Program Compliance Report

Appendix 7: 2024 Wetland Loss Annual Report

Appendix 8-1: 2024 Country Foods Monitoring Plan Annual Report

Appendix 8-2: Annual Monitoring Report Country Foods Socio-economic Conditions Follow-up Program (DS 6.13)

Appendix 9: 2024 Air Quality and Fugitive Dust Management Annual Report

Appendix 10: BW Gold Whitebark Pine 2024 Annual Report