



Blackwater Mine



2025 Cultural and Spiritual Resources Management Plan Annual Summary



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Acronyms and Abbreviations

| | |
|-------------------|---|
| Aboriginal Groups | Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stelat'en First Nation and Nazko First Nation (as defined in the Project's Environmental Assessment Certificate #M19-01) |
| AGM | Aboriginal Group Monitor |
| AIA | Archaeological Impact Assessment |
| Archer CRM | Archer Cultural Resource Management |
| Artemis | Artemis Gold Inc. |
| BC | British Columbia |
| Blackwater | Blackwater Gold Mine |
| BW Gold | BW Gold LTD. |
| CSRMP | Cultural and Spiritual Resources Management Plan |
| CHR | Cultural Heritage Resources |
| CMT | Culturally modified tree |
| ENV | Ministry of Environment and Climate Change Strategy |
| FSR | Forest Service Road |
| HCA | Heritage Conservative Act |
| IEM | Independent Environmental Monitor |
| LDN | Lhoosk'uz Dené Nation |
| MOF | Ministry of Forests |
| New Gold | New Gold Inc. |
| NFN | Nazko First Nation |
| NFNs | Nehcako First Nations |
| NWFN | Nadleh Whut'en First Nation |
| ROW | Right of Way |
| SFN | Saik'uz First Nation |
| StFN | Stelat'en First Nation |
| UFN | Ulkatcho First Nation |

1.0 Introduction

This report provides a summary of the activities described in the Cultural and Spiritual Resources Management Plan (CSRMP) for 2024, including new sites identified, and the effectiveness of mitigations for known sites.

The CSRMP is required by EAC Condition 18.

2.0 Heritage Conservation Act and Existing Permits

Section 12.1 of the *Heritage Conservation Act* (HCA) provides automatic protection for artifacts, features, materials or other physical evidence of human habitation or use on or before 1846 as well as petroglyphs, petroforms, heritage wrecks, and burials regardless of age.

There is no legislation that automatically protects intangible cultural and spiritual resources, including spiritual sites, transformer stones, ceremonial sites, and areas with Indigenous place names. However, Part 1 Section 4 of the HCA provides:

the Province (BC) may enter into a formal agreement with Indigenous Nations for the conservation and protection of heritage sites and objects that represent the cultural heritage of the aboriginal people who are represented by that Indigenous Nation.

An agreement under this section provides protection under section 12.1 of the HCA.

Permits issued under sections 12.2 and 12.4 of the HCA include heritage investigation and inspection permits:

- Heritage inspections under Section 12.2 of the HCA involve physical examinations and other research to identify the heritage value of a property or a portion of it, and to establish, if the property is a heritage site or heritage object, including the need for protection and conservation, or conformance with heritage protection requirements.
- Heritage investigations under Section 12.2 of the HCA involve archaeological or other systematic studies of heritage property to reveal their history, and may include the recording, removal and analysis of artifacts, features and other material necessary for the purpose of the heritage investigation.
- Site alteration under Section 12.4 of the HCA allows for impacts to an archaeological site once the heritage inspections and/ or investigations have been completed. Additional archaeological work may be required under a Site Alteration Permit including monitoring of impacts and artifact collection.

BW Gold received Mines Act Permit M-246 on June 22, 2021, authorizing early construction works for the Mine. Part C (Protection of Land and Watercourses) Condition 9 of the permit includes the following requirements related to archaeological resources:

- a) Prior to beginning any mechanized surface disturbance on undisturbed lands, the Permittee must conduct field surveys consistent with archaeological and cultural heritage resources management procedures consistent with the provisions of the BC Heritage Conservation Act.
- b) For those sites that cannot be avoided, the Permittee must contact the Archaeology Branch of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development and make arrangements to scientifically excavate and record findings.

The information summarized in this document is based on data collected under HCA Permit 2021-0322 obtained and managed by Archer Cultural Resource Management (Archer CRM). Reporting requirements

for this permit, including providing reports to First Nations, are fulfilled by Archer CRM. On December 28, 2023 the expiry date of this permit was extended from December 31, 2023 to December 31, 2025.

3.0 Known Sites

This section provides a summary of all known and newly identified cultural and spiritual heritage sites visited in 2025, with updates incorporated into Table 4.1.

In 2025, no new site visits were conducted at the mine site, and no new archaeological surveys were completed.

The primary focus was on annual archaeological monitoring on the Mine Site and Transmission Line, as well as work planning and site exclusion during clearing works on the BWG Mine Site.

Clearing activities were required to provide Davidson Creek access points for the 2025 fish salvage. Work planning of these activities included provision of FhSf-4 no work zone polygons to all clearing and fish salvage consultant personnel and constructing these access points to avoid logging or clearing around the FhSf-4 area, instead accessing Davidson from alternative routes or the other side of the creek.

4.0 Effectiveness of Mitigations

There is an archaeological database maintained within the project and five archaeological sites are located within the project boundaries: FhSe-73, FhSe-74, FhSf-4, FhSf-7, and FhSf-8. Table 4.1 summarizes mitigation measures, and their effectiveness, implemented for each known archaeological site visited in 2025.

Table 4.1 Known Archeological Sites Visited in 2025

| Site Name/ID | Year Identified | Report Number | Mitigation Measures | Mitigation Effectiveness | Status |
|----------------|-----------------|---------------|---|--|-----------|
| FhSe-73 | 2012 | 14302 | Regular monitoring, no work zone delineation and restricted access to the area to prevent unauthorized disturbances. | Annual site inspection done on May 3, 2025. No adverse effects. | Revisited |
| FhSe-74 | 2012 | 14302 | Regular monitoring, no work zone delineation and restricted access to the area to prevent unauthorized disturbances. | Annual site inspection done on May 3, 2025. No adverse effects. | Revisited |
| FhSf-4 | 2012 | 14302 | Regular monitoring, buffer delineation, and provision of no work zone polygons | Annual site inspection done on May 3, 2025. No clearing activities occurred near FhSf-4, buffer or general area. No adverse effects. | Revisited |
| FhSf-8 | 2012 | 14302 | Regular monitoring, site exclusion from development activities and physical barrier preventing unauthorized access. Additional flagging tape added. | Annual site inspection done on May 3, 2025. Physical barrier of connector channel remains in place preventing access to sites. No adverse effects. | Revisited |
| FhSf-7 | 2012 | 14302 | Regular monitoring, site exclusion from development activities and physical barrier preventing unauthorized access. Additional flagging tape was added. | Annual site inspection done on May 3, 2025. Physical barrier of connector channel remains in place preventing access to sites. No adverse effects. | Revisited |

5.0 Chance Finds

BW Gold maintains a thorough procedure for chance finds, reflected in the procedure appended to the CSRMP. Training on the CSRMP and Chance Find Procedure is provided through on-site orientation provided to all new BWG staff and contractors. The Chance Find Procedure was additionally added to BWG's online training software in 2025 for all employees.

Two chance find forms were submitted in 2025 to BWG. These were sent to Archer for analysis it was determined that these findings did not require additional action.

6.0 Known Spiritual Sites

According to the CSRMP, there are three identified spiritual resources near the Mine area that hold cultural importance and spiritual properties. Indigenous representatives and/or Knowledge Holders from the affected Indigenous groups are integral to the identification of any potential impacts to these resources caused by the Mine. Should impacts be identified, the plan specifies that the cultural and spiritual significance of these resources will be acknowledged through ceremony or appropriate cultural protocols. Measures will be taken to preserve these sites to the extent possible, including designating them as "No Work Zones" on maps and documents if they are confidential.

The three known spiritual sites identified are situated within the territories of Lhoosk'uz Dené Nation (LDN) and Ulkatcho First Nation (UFN) (Blackwater Gold Ltd., 2023). Consultations regarding these sites began during the development of the CSMP.

Notably, LDN has designated Kuyakuz Mountain and Kuyakuz Lake as "no go" zones for construction, underscoring their significant cultural importance. During the consultation phase of the plan, UFN and LDN did not identify the need for additional considerations regarding Tatelkuz Lake, which lies outside the initial area scope. However, BW Gold intends to resume discussions with the Nations concerning Tatelkuz Lake prior to any construction activities that may affect it, such as freshwater intake and pipeline installation.

Throughout the process, it has been recognized that Mt. Davidson will be impacted by the Mine, necessitating a blessing ceremony as communicated during meetings with LDN and UFN. This reflects the commitment to honoring and respecting the cultural and spiritual values associated with these resources in accordance with federal guidelines and the conditions outlined in Schedule B of the decision statement.

7.0 Aboriginal Group Monitor Participation

Aboriginal Group Monitors (AGMs) from LDN, UFN, NFNs, and Nazko First Nation were invited to participate in the assessments and monitoring activities described above. A summary of their involvement can be found in Table 7.1.

Table 7.1 Summary of CSRMP AGM Monitoring Activities

| AGMs | Date | Activity Summary |
|-------------|-------------|--|
| LDN | May 2025 | Monitoring and inspection of archeological sites on the BWG mine site. |

| | | |
|------------|---------------|--|
| UFN | August 2025 | Monitoring and inspection of CHR sites on the BWG mine site. |
| LDN | November 2025 | Monitoring and inspection of CHR sites on the BWG transmission line. |

Additionally, during 2025, LDN, UFN, NFNs and Nazko First Nation monitoring activities have consisted of participating in IEM and or EAO Inspections.

8.0 References

Blackwater Gold Ltd. (2023). *Cultural and Spiritual Resources Management Plan H.1.*

2025 Aboriginal Monitor Monthly Reports