

APPENDIX 9-I ARCHAEOLOGICAL AND CULTURAL HERITAGE RESOURCE MANAGEMENT PLAN



Blackwater Gold Project

Archaeological and Cultural Heritage Resource Management Plan

March 2022

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ACRONYMS AND ABBREVIATIONS

Aboriginal Groups or Indigenous nations	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stellat'en First Nation and Nazko First Nation (as defined in Environmental Assessment Certificate M#19-01)
ACHRMP	Archaeological and Cultural Heritage Resource Management Plan
AIA	Archaeological Impact Assessment
Artemis	Artemis Gold Inc.
BC	British Columbia
Blackwater	Blackwater Gold Project
BLO	Blaze oval
BSD	Bark stripped diamond
BSL	Bark stripped lenticular
BSO	Barked stripped oval
BW Gold	BW Gold LTD.
CEA Agency	Canadian Environmental Assessment Agency
CEO	Chief Executive Officer
CHR	Cultural heritage resource
CM	Construction Manager
CMT	Culturally modified tree
COO	Chief Operating Officer
DS	Decision Statement
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
EM	Environmental Manager
EMLI	Energy, Mines and Low Carbon Innovation
EMP	Environmental Management Plan
EMPR	Energy, Mines and Petroleum Resources
EMS	Environmental Management System
EPCM	Engineering, Procurement and Construction Management
ERM	ERM Consultants Canada Ltd

GM	General Manager
km	kilometre
New Gold	New Gold Inc.
Project	Blackwater Gold Project
VP	Vice President

1. PROJECT OVERVIEW

The Blackwater Gold Project (the Project) is a gold and silver open pit mine located in central British Columbia (BC), approximately 112 kilometres (km) southwest of Vanderhoof, 160 km southwest of Prince George, and 446 km northeast of Vancouver, British Columbia.

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

Major mine components include a tailings storage facility, ore processing facilities, waste rock, overburden and soil stockpiles, borrow areas and quarries, water management infrastructure, water treatment plants, accommodation camps and ancillary facilities. 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), Uikatcho First Nation (UFN), 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 (NWFN), Saik'uz First Nation (SFN), and Stelat'en First Nation (StFN; collectively, the Carrier Sekani First Nations) as well as the traditional territories of the Nazko First Nation (NFN), Nee Tahi Buhn Band, Cheslatta Carrier Nation and Yekooche First Nation (EAO 2019a and 2019b).

Project construction is anticipated to take two years. Mine development will be phased with an initial production rate of 15,000 tonnes per day (t/d) or 5.5 million tonnes per annum Mtpa for the first five years, increasing production up to 33,000 t/d (12 Mtpa) for the following five-years, and 55,000 t/d (20 Mtpa) in Year 11 until the end of the 23-year mine life. The Closure phase is 24 to approximately 45 years, ending when the Open Pit has filled and the TSF is allowed to passively discharge to Davidson Creek, and the Post-closure phase is 46+ years.

New Gold Inc. (New Gold) received Environmental Assessment Certificate #M19-01 (EAC) on June 21, 2019 (EAO 2019c) under the *2002 Environmental Assessment Act* (EAO 2019c) and a Decision Statement (DS; CEA Agency 2019) on April 15, 2019 under the *Canadian Environmental Assessment Act, 2012*. In August 2020, Artemis Gold Inc. (Artemis) acquired the mineral tenures, assets and rights in the Blackwater Project that were previously held by New Gold Inc. On August 7, 2020, the Certificate was transferred to BW Gold LTD (BW Gold), a wholly-owned subsidiary of Artemis, under the 2018 *Environmental Assessment Act*. 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, and that a process had been initiated to amend the DS.

2. PURPOSE AND OBJECTIVES

The purpose of the Archaeological and Cultural Heritage Resource Management Plan (ACHRMP) is to manage the Project's adverse effects on tangible cultural heritage resources. The ACHRMP is intended to provide a clear process to guide the development, implementation, and monitoring of measures to address adverse effects to tangible cultural resources already known to BW Gold as well as newly discoveries.

Tangible cultural heritage includes archaeological sites and other cultural heritage resources (CHRs) such as historic, traditional use, and paleontological sites. The scope of the ACHRMP includes an object, site or location of a traditional societal practice that is of historical, cultural or archaeological significance to a community or an aboriginal people. The ACHRMP includes procedures for inadvertent discovery or chance finds and applies to the Project's Construction, Operations, Closure and Post-closure phases.

This ACHRMP addresses the requirements of Section 9.11 (Archaeological Management and Impact Mitigation Plan) of the *Joint Application Information Requirements for Mines Act and Environmental Management Act Permits* (EMPR & ENV 2019).

3. ROLES AND RESPONSIBILITIES

BW Gold has the obligation of ensuring that all commitments are met and that all relevant obligations are made known to mine personnel and site contractors during all phases of the mine life. A clear understanding of the roles, responsibilities, and level of authority that employees and contractors have when working at the mine site is essential to meet Environmental Management System (EMS) objectives.

Table 3-1 provides an overview of general environmental management responsibilities during all phases of the mine life for key positions that will be involved in environmental management. Other positions not specifically listed in Table 3.1-1 but who will provide supporting roles include independent environmental monitors, an Engineer of Record (EOR) for each tailings storage facility and dam, an Independent Tailings Review Board (ITRB), TSF qualified person, geochemistry qualified professional, and other qualified persons and qualified professionals.

Table 3-1: Blackwater Roles and Responsibilities

Position	Responsibility
Chief Executive Officer (CEO)	The CEO is responsible for overall Project governance. Reports to the Board.
Chief Operating Officer (COO)	The COO is responsible for engineering and Project development and coordinates with the Mine Manager to ensure overall Project objectives are being managed. Reports to CEO.
Vice President (VP) Environment & Social Responsibility	The VP is responsible for championing the Environmental Policy Statement and EMS, establishing environmental performance targets and overseeing permitting. Reports to COO.
General Manager (GM) Development	The GM Development is responsible for managing project permitting, the Project's administration services and external entities, and delivering systems and programs that ensure Artemis's values are embraced and supported: Putting People First, Outstanding Corporate Citizenship, High Performance Culture, Rigorous Project Management and Financial Discipline. Reports to COO.
Mine Manager	The Mine Manager, as defined in the <i>Mines Act</i> , has overall responsibility for mine operations, including the health and safety of workers and the public, EMS implementation, overall environmental performance and protection, and permit compliance. The Mine Manager may delegate some of their responsibilities to other qualified personnel. Reports to GM.
Construction Manager (CM)	The CM is accountable for ensuring environmental and regulatory commitments/ and obligations are being met during the construction phase. Reports to GM.
Environmental Manager (EM)	The EM is responsible for the day-to-day management of the Project's environmental programs and compliance with environmental permits, updating EMS and MPs. The EM or designate will be responsible for reporting non-compliance to the CM, and Engineering, Procurement and Construction Management (EPCM) contractor, other contractors, the Company and regulatory agencies, where required. Supports the CM and reports to Mine Manager.
Departmental Managers	Departmental Managers are responsible for implementation of the EMS relevant to their areas. Report to Mine Manager.
Indigenous Relations Manager	Indigenous Relations Manager is responsible for Indigenous engagement throughout the life of mine. Also responsible for day-to-day management and communications with Indigenous groups. Reports to VP Environment & Social Responsibility.

Position	Responsibility
Community Relations Advisor	Community Relations Advisor is responsible for managing the Community Liaison Committee and Community Feedback Mechanism. Reports to Indigenous Relations Manager.
Environmental Monitors	Environmental Monitors (includes Environmental Specialists and Technicians) are responsible for tracking and reporting on environmental permit obligations through field-based monitoring programs. Report to EM.
Aboriginal Monitors	Aboriginal Monitors are required under EAC condition 17 and will be responsible for monitoring for potential effects from the Project on the Indigenous interests. Indigenous Monitors will be involved in the adaptive management and follow-up monitoring programs. Report to EM.
Employees and Contractors	Employees are responsible for being aware of permit requirements specific to their roles and responsibilities. Report to Departmental Managers.
Qualified Professional and Qualified Persons	Qualified professionals and qualified persons will be retained to review objectives and conduct various aspects of environmental and social monitoring as specified in EMPs and social MPs.

BW Gold will employ a qualified person as an EM who will ensure that the EMS requirements are established, implemented and maintained, and that environmental performance is reported to management for review and action. The EM is responsible for retaining the services of qualified persons or qualified professionals with specific scientific or engineering expertise to provide direction and management advice in their areas of specialization. The EM will be supported by a staff of Environmental Monitors that will include Environmental Specialists and Technicians and by a consulting team of subject matter experts in the fields of environmental science and engineering.

During the Construction phase, BW Gold will be entering into multiple EPC contracts, likely for the Transmission Line, Process Plant, Tailings and Reclaim System, and 25kV Power Distribution. Each engineer/contractor will have their own CM and there will be a BW Gold responsible PM and/or Superintendent who ultimately reports to the GM Development. Some of the scope, such as the TSF and Water Management Structures will be self-performed by BW Gold, likely using hired equipment. Other smaller scope packages may be in the form of EPCM contracts. The EPCM contractors will report to the CMs who will ultimately be responsible for ensuring that impacts are minimized, and environmental obligations are met during the Construction phase. For non-EPCM contractors, who will perform some of the minor works on site, the same reporting structure, requirements, and responsibilities will be established as outlined above. BW Gold will maintain overall responsibility for management of the construction and operation of the mine site and will therefore be responsible for establishing employment and contract agreements, communicating environmental requirements, and conducting periodic reviews of performance against stated requirements.

The CM is accountable for ensuring that environmental and regulatory commitments/obligations are being met during the construction phase. The EM will be responsible for ensuring that construction activities are proceeding in accordance with the objectives of the EMS and associated MPs. The EM or designate will be responsible for reporting non-compliance to the CM and EPCM contractor, other contractors, and regulatory agencies, where required. The EM or designate will have the authority to stop any construction activity that is deemed to pose a risk to the environment; work will only proceed when the identified risk and concern have been addressed and rectified.

Environmental management during operation of the Project will be integrated under the direction of the EM, who will liaise closely with departmental managers and will report directly to the Mine Manager. The EM will be supported by the VP of Environment and Social Responsibility in order to provide an effective and

integrated approach to environmental management and ensure adherence to corporate environmental standards. The EM will be accountable for implementing the approved MPs and reviewing them periodically for effectiveness. Departmental area managers (e.g., mining, milling, and plant/site services) will be directly responsible for implementation of the EMS and EMPs relevant to their areas. All employees and contractors are responsible for daily implementation of the practices and policies contained in the EMS.

Pursuant to Condition 19 of the EAC, BW Gold has established an Environmental Monitoring Committee to facilitate information sharing and provide advice on the development and operation of the Project, and the implementation of EAC conditions, in a coordinated and collaborative manner. Committee members include representatives of the Environmental Assessment Office (EAO), UFN, LDN, NWFN, StFN, SFN, NFN, Ministry of Energy, Mines and Low Carbon Innovation (EMLI), ENV and Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD).

Pursuant to Condition 17 of the EAC, Aboriginal Group Monitor and Monitoring Plan, BW Gold will retain or provide funding to retain a monitor for each Aboriginal Group prior to commencing construction and through all phases of the mine life. The general scope of the monitor's activities will be related to monitoring for potential effects from the Project on the Aboriginal Group's Aboriginal interests.

4. COMPLIANCE OBLIGATIONS, GUIDANCE, AND BEST MANAGEMENT PRACTICES

4.1 Legislation

Federal legislation applicable to archaeological sites and CHRs includes:

- *Impact Assessment Act*, and
- *United Nations Declaration on the Rights of Indigenous Peoples Act*.

Provincial legislation applicable to the ACHRMP includes:

- *Coroner's Act*;
- *Cremation, Interment, and Funeral Services Act*;
- *Declaration on the Rights of Indigenous Peoples Act*;
- *Environmental Assessment Act*;
- *Forest and Range Practices Act*;
 - *Forest Planning and Practices Regulation*;
- *Freedom of Information and Protection of Privacy Act*
- *Heritage Conservation Act*;
- *Land Act*;
- *Mineral Tenure Act*;
- *Mines Act*; and
 - Health, Safety and Reclamation Code for Mines in BC.
- *Wildlife Act*.

4.1.1 Heritage Conservation Act

Heritage resources are protected under the *Heritage Conservation Act*. Definitions of heritage resources under the Act that are applicable to the ACHRMP include:

"heritage object" means, whether designated or not, personal property that has heritage value to British Columbia, a community or an aboriginal people;

"heritage site" means, whether designated or not, land, including land covered by water, that has heritage value to British Columbia, a community or an aboriginal people; and

"heritage value" means the historical, cultural, aesthetic, scientific or educational worth or usefulness of a site or object;

Section 12.1 of the *Heritage Conservation Act* 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.

Permits issued under sections 12.2 and 12.4 of the Act include heritage investigation and inspection permits. Heritage inspections 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 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.

Section 12.3(1) of the Act allows the minister may order that a heritage inspection or heritage investigation be conducted if the minister considers that one or more of the following apply:

- (a) *land may contain a heritage site or heritage object protected under section 12.1;*
- (b) *land that may have heritage value, or that may include a heritage site or heritage object, may be subject to subdivision;*
- (c) *property may be subject to alienation from government ownership;*
- (d) *property that may have heritage value, or land that may include heritage property, may be subject to alteration by natural or human causes;*
- (e) *an object that may have heritage value may be subject to removal from British Columbia.*

Examples of historic and/or cultural sites include trails, historic settlements, log cabins and culturally modified trees (CMTs) and blazes. Examples of paleontological sites include dinosaur trackways/preserved foot prints and bones, plant fossils and shell beds and other invertebrate fossils.

4.2 Environmental Assessment Certificate and Federal Decision Statement Conditions

No EAC or DS conditions are addressed in the ACHRMP. The Cultural and Spiritual Resources Management Plan addresses EAC Condition 18 and DS Conditions 7.1, 7.2 and 7.3 and is provided in Appendix B.

4.3 Existing Permits

BW Gold received *Mines Act* Permit M-246 on June 22, 2021, authorizing early construction works for the Project. Part C (Protection of Land and Watercourses) Condition 9 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.*

4.4 Guidelines and Best Management Practices

Guidelines and best management practices related to cultural heritage resources include:

- BC Archaeological Impact Assessment Guidelines (Archaeology Branch 1998);
- BC Fossil Management Framework (Nd); and
- Technical Guidance for Assessing Physical and Cultural Heritage or and Structure, Site or Thing (CEA Agency 2015).

5. BASELINE CULTURAL HERITAGE RESOURCES INFORMATION

An Archaeological Impact Assessment (AIA) under Permit #2012-0295 was undertaken in fall 2012 and summer 2013, which covered the mine site footprint and Project linear infrastructure (AMEC 2013). Figure 5.1-1 identifies known archaeological, historic and CMTs within the mine site are shown on Figure 5.1-1 and described below.

5.1 Known Archaeological Sites

Known archaeological sites identified within the mine site are:

- FhSe-73 consists of a subsurface lithic scatter and a cultural depression located on a terrace along the northern bank of Davidson Creek approximately 11 km southwest of the confluence of Chedakuz Creek and Davidson Creek. The collected artifact includes one chalcedony flake. The cultural depression has a half rim from the northeast to southwest and is presumed to be a cache pit. The site measures 10 m N-S by 8 m E-W (AMEC 2013).
- FhSe-74 consists of a subsurface lithic scatter located on a terrace on the south side of Davidson Creek approximately 11 km southwest of the confluence of Chedakuz Creek and Davidson Creek. The collected artifacts include three basaltic flake and one obsidian flake. The site measures 10 m by 10 m NE-SW (AMEC 2013).
- FhSf-4 consists of a subsurface lithic scatter located on a terrace overlooking Davidson Creek, 13 km southwest of Tatelkuz Lake. The collected artifacts include one rhyolite flake and a grey chert scraper. The site measures 25 m N-S by 15 m E-W (AMEC 2013).
- FhSf-7 consists of a subsurface lithic scatter located on a knoll overlooking an unnamed lake and the headwaters of Davidson Creek to the east. The collected artifacts include one basalt flake. The site measures 20 m N-S by 8 m E-W (AMEC 2013).
- FhSf-8 consists of a subsurface lithic scatter located on a knoll 14 km southwest of FhSf-7. The landform overlooks an unnamed lake and the headwaters of Davidson Creek to the east. The site measures 34 m N-S by 10 m E-W (AMEC 2013).

5.2 Known Cultural Heritage Resource Sites

Known cultural heritage resources within the mine site include 20 culturally modified trees (CMTs; Table 5.2-1) two trails, and one historic cabin. Of the 20 CMTs, 13 overlap mine infrastructure, four are within 50 m of mine infrastructure, two are located between 50 and 150 m of infrastructure, and one located over 150 m from mine infrastructure.

Table 5.2-1: Post-1846 CMTs and Cabin Located within the Mine Site

CHR#	Type ¹	Year Modified ^{2,3}	Comments	Distance to Infrastructure	Infrastructure
1	BSO	Unknown	21 blazes on two NE/SW trending terraces. Likely from mineral exploration	0	TSF
2	BSO	Unknown	19 N/S trending blazes. Likely from mineral exploration	0	Transmission Line
3	BSO	Unknown	5 historic blazes trending NW/SE for 50 m towards Davidson Creek	0	TSF
4	BSO	Unknown	4 blazed trees trending N/S over 1.1 km	0	Transmission Line

CHR#	Type ¹	Year Modified ^{2,3}	Comments	Distance to Infrastructure	Infrastructure
5	BSO/BSD	Unknown	8 blazed trees trending E/W over 200 m	0	TSF
6	BSL	1897/1907 (+/- 10 years)	Two standing dead trees	0	TSF
10	Bound	Unknown	Single "bound" CMT	77 m north	Mine Access Road
11	Bound	Unknown	Single "bound" CMT	0	TSF
13	Bound	Unknown	Bound CMT	0	TSF
15	BSO	Unknown	Advanced state of decay. Unable to date.	0	TSF
16	BSL	Unknown	Advanced state of decay. Unable to date.	0	TSF
20	BLO	Unknown	4 blazed trees in linear alignment suggesting association with mineral exploration.	40 m south	Mine Site Road
21	BLO	<30	2 blazed trees in linear alignment suggesting association with mineral exploration	160 m south	Mine Site Road
22	BLO	<20	3 chainsaw cut blazed trees in linear alignment suggesting association with mineral exploration	23 m north	Low Grade Ore Stockpile
23	BLO	<20	1 chainsaw cut blazed tree located on a game trail.	0	Lower Waste Stockpile
24	BLO	Unknown	6 blazed trees in linear alignment suggesting association with mineral exploration	70 m north	Lower Waste Stockpile
25	N/A	Unknown	11 blazed trees in linear alignment suggesting association with mineral exploration	0	Transmission Line
26	Shaped	Post 1935	1 CMT sampled	10 m south	Mine Site Road
27	Shaped	Post 1993	1 CMT sampled	25 m north	Mine Site Road
28	BSO	1936-1993	Trees along a well used trail	0	Transmission Line
Cabin	Cabin	1940-1980	Log cabin foundation and kitchen wares	17 m north	Core Storage Facility

¹ BSO: Barked Stripped Oval, BSD: Bark Stripped Diamond, BSL: Bark Stripped Lenticular, BLO: Blaze Oval.

² The CMTs referenced in the table were identified in the Blackwater Application for an Environmental Assessment Certificate /Environmental Impact Statement (New Gold 2015) as post-1846. The Year Modified is noted as 'Unknown' if the tree was not cored during the AIA then the date is unknown. In these instances, professional judgement may have been used to conclude if the tree pre-dated 1846.

³ It is difficult to determine the exact date of the CMT if the tree is too rotten or if in the professional opinion of archaeologist, the scar obviously post-dated 1846. This determination is often made based on the age of the tree or the nature of the modification.

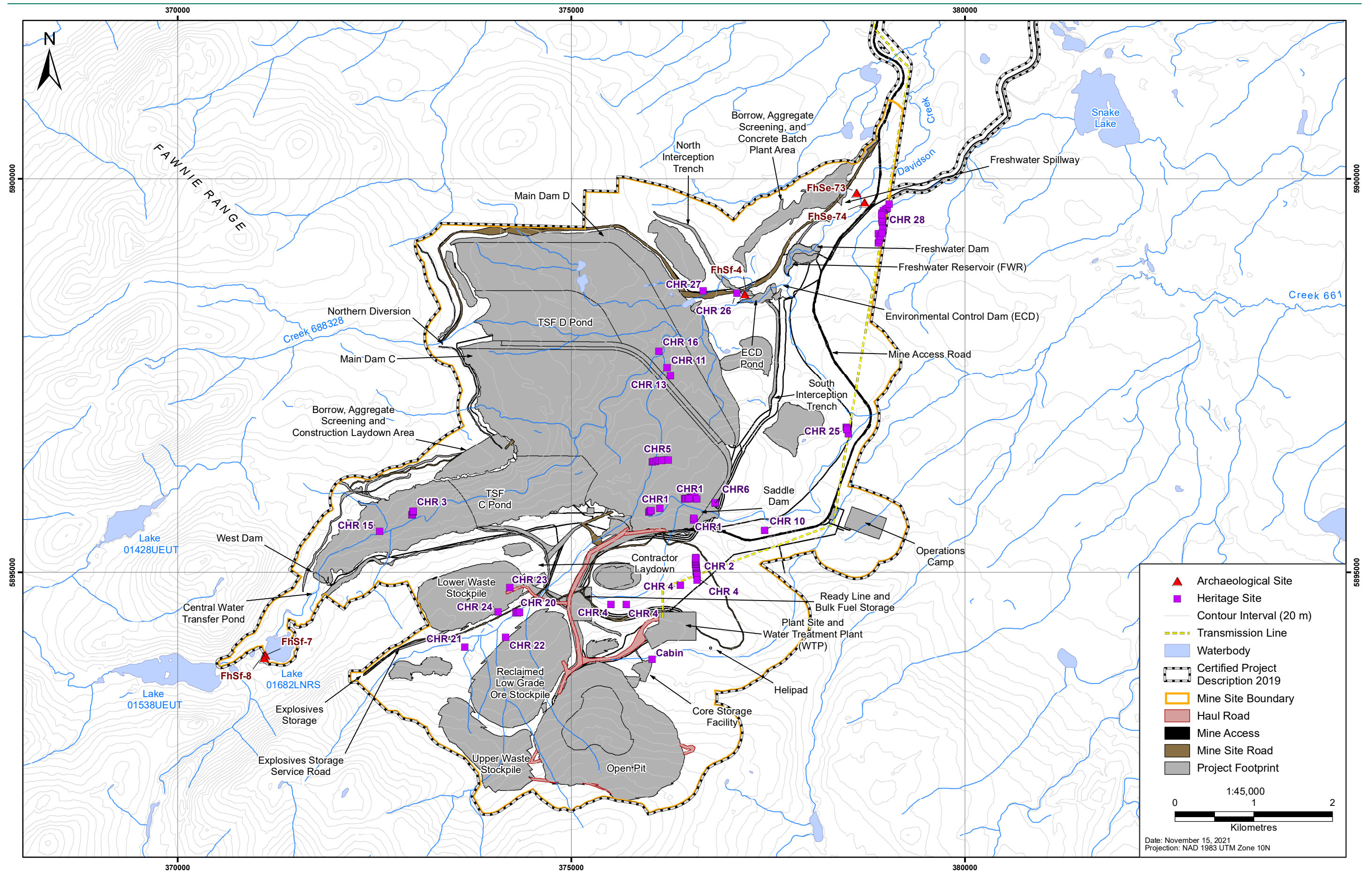


Figure 5.1-1: Known Archaeological Sites and Cultural Heritage Resources

6. PROTECTION MEASURES FOR KNOWN SITES

6.1 Archaeological Sites

The following measures will be undertaken for Project activities located within 0 to 50 metres (m) of a known site:

- Flag or delineate an area of at least 50 metres around the site and mark as a “No Work Zone” from the site boundary.
- Construction monitoring (Section 10) during activities in the area of the site.
- If the site is impacted, the EM contacts the Project archaeologist to determine if additional mitigation measures are required.
- If the site cannot be avoided then mitigation must be conducted prior to impact. Procedures to record, analyse and mitigate effects on a site will be determined in consultation with the BC Archaeology Branch and Aboriginal Groups and carried out by an archaeologist under sections 12.2 (heritage investigation) and 12.4 (site alteration) of the *Heritage Conservation Act*. Mitigation may involve detailed mapping, photography, and systematic data recovery through surface collection and controlled excavations of evaluative units if subsurface deposits are present. Where applicable, post-1846 CMTs are not protected and any mitigations would not be covered by the scope of a *Heritage Conservation Act* permit.

The following measures will be taken for Project activities located within 50 and 150 m of a known site:

- Flag or delineate an area of at least 50 metres around the site and mark as a “No Work Zone” from the site boundary.
- Periodic monitoring (Section 10) of the site.
- If impacts on archaeological sites (Section 6.1) have occurred mitigation measures will be required.

6.2 Historic Site

There is one documented historic cabin site within the mine site (Section 5.2; Figure 5.1-1). If avoidance is not possible, and artifacts or features associated with this site will be impacted, Aboriginal Groups and the local museum will be consulted and given the opportunity to collect/preserve artifacts associated with this site.

6.3 Culturally Modified Tree Sites

There are 20 known post-1846 CMT sites within the mine site that may be impacted by Project infrastructure (Section 5.2; Figure 5.1-1). Prior to alteration to post-1846 CMTs the relevant/affected Indigenous communities will be consulted to determine, if necessary, the preferred mitigation measures. Common mitigation measures for post-1846 CMTs with cultural significance include: detailed measurements and photography, removing and preserving the modified portion of the tree, or removing a cross-section (cookie) of the modified portion of the tree. These measures allow for the preservation of some or all of the information about the modification(s) made to the tree.

6.4 Trails

There are no known trails located within the mine site. Prior to the alteration of a trail the relevant/affected Indigenous communities will be consulted to determine, if necessary, the preferred mitigation measures. Possible mitigation measures for recording trails include photography and detailed mapping of the route and surrounding features.

6.5 Paleontological Sites

There are no known paleontological sites located within the mine site. If paleontological sites are encountered, work will be stopped pending consultation with the Fossil Management Office. The site will also be flagged or delineated by an area of at least 50 metres around the site and marked as a “No Work Zone” from the site boundary.

7. PROTECTION OF UNKNOWN SITES

An Archaeological and Cultural Heritage Chance Find Procedure and reporting form is provided in Appendix A. Agreements respecting Indigenous customs and protocols respecting the discovery, handling, recognition, recording, transferring and safekeeping of unknown sites and confidentiality will be developed and in place prior to the commencement of Project construction.

8. SUPPORT

8.1 Training and Awareness

All those responsible for the management, implementation, and operation of any aspect of the ACHRMP will be adequately trained for their role.

Prior to the commencement of Project work, all workers will:

- Have reviewed and be aware of the requirements of the ACHRMP;
- Have reviewed and understood information pertaining to Archaeological and Cultural Heritage Chance Find Procedures appropriate for the work activity being undertaken; and
- Be provided with maps indicating the locations of archaeological and CHRs' sites and "No Work Zone" buffers.

8.2 Supporting Documentation

Documentation supporting the protection of archaeological, historical and paleontological sites and CHRs in, but is not limited to, the following:

- Maps indicating the locations of archaeological and CHRs sites and "No Work Zone" buffers;
- Training information for BW Gold staff and on-site personnel (including contractors);
- Archaeological and Cultural Heritage Chance Find Procedure;
- Monitoring and compliance reports including the AIA, site alteration, paleontological, historical, and cultural site reports.

9. CONFIDENTIALITY

Sites that are identified by Aboriginal Groups as confidential will be depicted with “No Work Zone” buffers.

BW Gold will consult Aboriginal Groups on the manner by which to protect the confidentiality of a discovery, consistent with provincial laws. The Archaeological and Cultural Chance Find Procedure will be revised to incorporate confidentiality provisions.

10. MONITORING

10.1 Construction Monitoring

Archaeological and CHR sites within 150 m of the Project footprint will be marked on Project site maps (Section 6). Sites that are identified by Aboriginal Groups as confidential will be depicted with a 50 m No Work Zone buffer. The EM and Aboriginal Monitors will monitor these sites during construction. Should impacts be anticipated, or found within 50 m of a site, Aboriginal Groups and Project Archaeologist will be contacted to determine if additional mitigation measures are required. The EM will be debriefed on the proposed mitigation measures.

10.2 Annual Monitoring

The EM and Aboriginal Monitors will, on an annual basis, verify that archaeological and CHR remain intact and are unaffected by the Project and check the condition of site protection (i.e., flagging or fencing). Should impacts be observed at sites, the Project Archaeologist (while the Heritage Inspection Permit is valid) and the Archaeology Branch will be contacted to determine mitigation measures. Should impacts be observed at archaeological and CHR sites, the EM will contact Traditional Knowledge Holder(s) of Aboriginal Groups to discuss mitigation measures.

11. REPORTING AND RECORD KEEPING

Reporting will comply with permit conditions and Archaeological and Cultural Heritage Chance Find Procedure. The process for reporting information related to archaeological and CHR will be subject to agreements with Aboriginal Groups.

A detailed record of monitoring activities will be taken as this information will be summarized in a Heritage Site Monitoring Report to be provided to the Project Archaeologist and affected Indigenous nations, as well as the Archaeology Branch if an archaeological site is impacted. The EM, Project Archaeologist and/or Aboriginal Monitors will document by means of photographs and field notes, the type of construction and disturbance occurring near a site, weather conditions, personnel present, and/or other details. It is imperative that the following data be collected during heritage site monitoring as information gathered may be required for inclusion in compliance reports:

- site photographs;
- coordinates for any disturbances;
- details of any actions taken to protect the sites; and
- recommendations for any changes to the protective measures, if required.

12. PLAN IMPLEMENTATION

Archaeological impact assessments will be conducted in areas of mine components that have not been previously assessed prior to construction. During construction and operations, the Archaeological and Cultural Heritage Chance Find Procedure will be implemented to aid in the identification of as-yet unknown heritage sites.

BW Gold will work with Aboriginal Group representatives and/or traditional knowledge holders from Indigenous Nations to identify their involvement in the implementation of the ACHRMP, including a procedure for providing written reports to Aboriginal Groups on the implementation of this plan, including provision of a summary written in plain language.

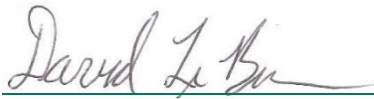
13. PLAN REVISION

The ACHRMP is a 'living document' and components of the plan may be reviewed over the life of the Project, in consultation with Aboriginal Groups. The plan may be updated as frequently as every year, or not at all if the management and mitigation measures are found to be robust by a qualified person. Any updated copy of the plan will be filed with EMLI, FLNRORD and Aboriginal Groups.

14. QUALIFIED PERSONS

This management plan has been prepared and reviewed by the following qualified persons:

Prepared by:



David Le Beau, MA
Consulting Archaeologist, ERM

Reviewed by:



Dan Walker, MA, Registered Professional
Consulting Archaeologist
Principal Consultant ERM

15. REFERENCES

Definitions of the acronyms and abbreviations used in this reference list can be found in the Glossary and Abbreviations section.

Legislation

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Declaration on the Rights of Indigenous Peoples Act, SBC 2019, c 44.

Environmental Assessment Act, SBC 2018, c 51.

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Forest Planning and Practices Regulation, BC Reg. 14/2004.

Freedom of Information and Protection of Privacy Act, RSBC 1996, c 165.

Heritage Conservation Act, RSBC 1996, c 187.

Impact Assessment Act, SC 2019, c 28.

Land Act, RSBC 1996, c 245.

Mineral Tenure Act, RSBC 1996, c 292.

Mines Act, RSBC 1996, c 293.

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APPENDIX A ARCHAEOLOGICAL AND CULTURAL HERITAGE CHANCE FIND PROCEDURE



Blackwater Gold Project: Archaeological and Cultural Heritage Chance Find Procedure

APPLICATION

This procedure applies to previously unidentified physical or cultural heritage features or structures, sites, or things of historical, archaeological, paleontological, or architectural significance and provides mitigation measure to avoid or reduce adverse effects.

PROCEDURE

All those responsible for the management, implementation, and operation of any aspect of this procedure will be adequately trained for their role.

Employees and contractors will receive information related to heritage resources previously identified on site as well as cross-cultural training on the history of local Indigenous nations and training on the Chance Find Procedure on their arrival on site through an environmental on-boarding training session and prior to the start of work as part of the Site Orientation. The purpose of this training is to provide site personnel with a basic level of awareness related to heritage, spiritual and archaeological resources and an understanding of their obligations regarding compliance with plan, regulatory requirements, commitments and best practices.

Site supervisors will be provided with a copy of the CSMP and will receive additional training with respect to the Chance Find Procedure.

BW Gold will regularly review and update the training and awareness related to the plan based on changes in training needs and regulatory requirements.

Prior to the commencement of Project work, all workers will:

1. Have received training on the use of this procedure;
2. Have been provided information on typical identifiers for archaeological and cultural use sites;
3. Have reviewed and be aware of the requirements of this procedure;
4. Have reviewed and understood information pertaining to Chance Find Procedures appropriate for the work activity being undertaken.

If in the course of your work you discover what you suspect may be a possible archaeological, historic, cultural, spiritual and/or paleontological site, the following procedures apply:

Upon Discovery

1. Immediately halt work at the location of the discovery, except work required to be undertaken to protect the integrity of the discovery.
2. Delineate an area of at least 50 metres around the discovery as a 'no work' zone.
3. Note the location (GPS coordinates) and take photographs.
4. Inform your supervisory, Environmental Manager (EM) or Mine Manager immediately.
5. Prepare an initial Chance Find Form (attached).

Post-Discovery

- Within 24 hours of the discovery, the EM contacts the Project archaeologist and informs Indigenous groups and the Impact Assessment Agency (Table 1 provides key contact information).
- The EM invites Indigenous groups to monitor any work related to the discovery.
- The Project archaeologist conducts an assessment at the location of the discovery subject to BC's Archaeological Impact Assessment Guidelines and protocols that are in place with Indigenous groups respecting the discovery, handling, recognition, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance and the confidentiality of a discovery.
 - If the discovery is an archaeological site, the Project archaeologist contacts the BC Archaeology Branch. The Project archaeologist, in consultation with the Archaeology Branch, conducts an investigation, and provides updates to the Archaeology Branch and Indigenous groups on the progress of the investigation. The Project Archaeologist works with the EM and Indigenous groups to prepare Site Report, which includes instruction to recommence work in the area. The Site Report is submitted to the EM, Indigenous groups and the Archaeology Branch.
 - If the discovery is a historic site, the Project archaeologist contacts Indigenous groups and local communities to determine site significance.
 - If the discovery is a cultural or spiritual site, the Project archaeologist contacts Indigenous groups to determine site significance.
 - If the discovery is a paleontological site, the Project archaeologist contacts BC's Fossil Management Office.
- Subject to protocols with Indigenous groups, any material discovered on the Project site is stored in a secure location with limited access as follows:
 - If the material is archaeological, the artifact is held by the Project archaeologist until the *Heritage Conservation Act* (HCA) Section 12 permit has expired and the artifact(s) is submitted to the repository designated in the permit.
 - If the material is historical, the repository is determined in consultation with Indigenous nations and local communities.
 - If the material is cultural and/or spiritual, the repository is determined by Indigenous nations.
 - If the material is paleontological, the repository is determined by the Fossil Management Office.
- The handling and storage of material, apart from material outlined in the HCA Section 12 permit, is determined in consultation with Indigenous Nations.

Suspected Human Remains Discovery

If in the course of your work you discover what you suspect may be human remains, the follow procedures apply:

- Immediately halt work in the area of the discovery.
- Do not disturb or move the possible human remains.
- Note the location (GPS coordinates) and take photographs.
- Report your discovery to your supervisor, EM or Mine Manager.
- If you are unable to contact a BW Gold representative, and the suspected human remains appear to be current, contact the Vanderhoof RCMP.

The following steps will generally be followed.

- The Coroners Service (Northern Region) in Prince George and Vanderhoof RCMP will be notified and the Coroners Service will determine whether the matter is of contemporary forensic concern.
- If the remains are not of forensic concern, the Archaeology Branch will attempt to facilitate disposition of the remains.
- If a cultural affiliation for the remains can be determined, the Archaeology Branch will contact an organization representing that cultural group. If the remains are of Indigenous ancestry, the Branch will contact the relevant Indigenous communities.
- If remains are buried and under no immediate threat of further disturbance, they will not be excavated or removed. If the remains are partially buried or uncovered, the Archaeology Branch will facilitate disposition.

Table 1: Key Contacts

Name	Email	Phone Number
Archaeology Branch	Archaeology@gov.bc.ca	1 (250) 953-3334
Blackwater Gold	office.blackwater@artemisgoldinc.com	1 (250) 567-3276
Fossil Management Office	Fossil.Management@gov.bc.ca	1 (250) 356-7506
Ulkatcho First Nation	chief@ulkatcho.ca	1 (250) 742-3260
Lhoosk'uz Dené Nation	admin@lhooskuz.com	1 (250) 992-3290
Nadleh Whut'en First Nation	TBC	1 (250) 690-7211
Stellat'en First Nation	TBC	1 (250) 699-8747
Saik'uz First Nation	TBC	1 (250) 567-9293
Nazko First Nation	TBC	1 (250) 992-7982
Skin Tyee Nation	TBC	1 (250) 694-3517
Tsilhqot'in Nation	TBC	1 (778) 799-2145 or (250) 392-3918
Métis Nation British Columbia	Communications@mnbc.ca	1 (604) 557-5851
Nee-Tahi-Buhn Band	TBC	1 (250) 694-3494
Impact Assessment Agency	iaac.vancouver.aeic@canada.ca	1 (604) 666-2431
BC Coroners Service Northern Region (Prince George)	N/A	1 (888) 991-2111 (toll free) 1 (250) 861 7429
Vanderhoof RCMP	N/A	1 (250) 567-2222
Prince George RCMP	N/A	1 (250) 562-3300

Cultural Heritage Chance Find Report Form

Recorder's Name/Affiliation: _____

Date: _____

Location of chance find (Location description,
UTM coordinates, development, depth below surface): _____

Description of find: _____

Method used to mark and protect find: _____

Distribution:

☐
BW Gold

☐
Site Archaeologist

☐
Indigenous
Nations

☐
Archaeology
Branch

☐
Fossil
Management
Office

Sketch Map

Photo

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APPENDIX B CULTURAL AND SPIRITUAL RESOURCES MANAGEMENT PLAN



Blackwater Gold Project

Cultural and Spiritual Resources Management Plan

March 2022

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ACRONYMS AND ABBREVIATIONS

Aboriginal Groups or Indigenous nations	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stellat'en First Nation and Nazko First Nation (as defined in the Project's Environmental Assessment Certificate #M19-01)
AIA	Archaeological Impact Assessment
Artemis	Artemis Gold Inc.
BB	Big Bend
BC	British Columbia
Blackwater	Blackwater Gold Project
BLO	Blaze oval
BSD	Bark stripped diamond
BSL	Bark stripped lenticular
BSO	Barked stripped oval
BW Gold	BW Gold LTD.
CEA Agency	Canadian Environmental Assessment Agency
CEO	Chief Executive Officer
CSMP	Cultural and Spiritual Resources Management Plan
CHR	Cultural Heritage Resources
CM	Construction Manager
CMT	Culturally modified tree
COO	Chief Operating Officer
DS	Decision Statement
EM	Environmental Manager
EMLI	Ministry of Energy, Mines and Low Carbon Innovation
EMS	Environmental Management System
EPCM	Engineering, Procurement and Construction Management
ENV	Ministry of Environment and Climate Change Strategy
ERM	ERM Consultants Canada Ltd.
FLNRORD	Ministry of Forests, Lands, Natural Resource Operations and Rural Development
GM	General Manager
IAAC	Impact Assessment Agency of Canada

Indigenous groups or Aboriginal Peoples	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stelat'en First Nation, Nazko First Nation, Skin Tyee Nation, T̓silhqot'in Nation, Métis Nation British Columbia and Nee-Tahi-Buhn Band (as defined in the Project's federal Decision Statement)
km	Kilometre
LDN	Lhoosk'uz Dené Nation
New Gold	New Gold Inc.
NFN	Nazko First Nation
NWFN	Nadleh Whut'en First Nation
Project	Blackwater Gold Project
SFN	Saik'uz First Nation
StFN	Stelat'en First Nation
SMR	Stellako/Mills Ranch
t	Tonnes
TSF	Tailings Storage Facility
UFN	Ulkatcho First Nation
VP	Vice President

1. PROJECT OVERVIEW

The Blackwater Gold Project (the Project or Blackwater) is a gold and silver open pit mine located in central British Columbia (BC), approximately 112 kilometres (km) southwest of Vanderhoof, 160 km southwest of Prince George, and 446 km northeast of Vancouver.

The Project is presently accessed via the Kluskus Forest Service Road (FSR), the Kluskus-Ootsa FSR and an exploration access road, which connects to the Kluskus-Ootsa FSR at km 142. The Kluskus FSR joins Highway 16 approximately 10 km west of Vanderhoof. A new, approximately 13.8 km road (Mine Access Road) will be built to replace the existing exploration access road, which will be decommissioned. The new planned access is at km 124.5. Driving time from Vanderhoof to the mine site is about 2.5 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. 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), Uikatcho First Nation (UFN), 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 (NWFN), Saik'uz First Nation (SFN), and Stellat'en First Nation (StFN; collectively, the Carrier Sekani First Nations) as well as the traditional territories of the Nazko First Nation (NFN), Nee Tahi Buhn Band, Cheslatta Carrier Nation and Yekooche First Nation (EAO 2019a, 2019b).

Project 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 (20 Mtpa) in Year 11 until the end of the 23-year mine life. The Closure phase is 24 to approximately 45 years, ending when the Open Pit has filled and the TSF is allowed to passively discharge to Davidson Creek, and the Post-closure phase is 46+ years.

New Gold Inc. (New Gold) received Environmental Assessment Certificate #M19-01 (EAC) on June 21, 2019 under the *Environmental Assessment Act* (2002) (EAO 2019c) and a Decision Statement (DS) on April 15, 2019 under the *Canadian Environmental Assessment Act, 2012* (CEA Agency 2019). In August 2020, Artemis Gold Inc. (Artemis) acquired the mineral tenures, assets and rights in the Blackwater Project that were previously held by New Gold. On August 7, 2020, the Certificate was transferred to BW Gold LTD. (BW Gold), a wholly-owned subsidiary of Artemis, under the *Environmental Assessment Act* (2018). The Impact Assessment Agency of Canada (IAAC) 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, and that a process had been initiated to amend the DS.

2. PURPOSE AND OBJECTIVES

This plan has been developed to meet the requirements of EAC Condition 18 (Cultural and Spiritual Resources Management Plan) and DS Condition 7 (Physical and Cultural Heritage and Structures, Sites or Things of Historical, Archaeological, Paleontological or Architectural Significance), as well as associated conditions of each authorization.

The purpose of the Cultural and Spiritual Resources Management Plan (CSMP) is to mitigate the Project's potential effects on known and as-yet unknown heritage resources or values. The BC *Heritage Conservation Act* includes the following definitions of "heritage" that are applicable to this plan:

"heritage object" means, whether designated or not, personal property that has heritage value to British Columbia, a community or an aboriginal people

"heritage site" means, whether designated or not, land, including land covered by water, that has heritage value to British Columbia, a community or an aboriginal people

"heritage value" means the historical, cultural, aesthetic, scientific or educational worth or usefulness of a site or object

The federal DS defines "heritage value" as *"the aesthetic, historic, scientific, cultural, social or spiritual importance or significance for past, present or future generations."*

Heritage resources considered in the CSMP include archaeological sites, historic sites, cultural sites (trails, historic settlements, log cabins), spiritual sites, culturally modified trees (CMTs), blazes and paleontological sites (dinosaur trackways/preserved foot prints and bones and plant fossils and shell beds and other invertebrate fossils).

The objective of the CSMP is to provide a clear process to guide the development, implementation, and monitoring of measures to address adverse effects on known and as-yet unknown heritage resources or values.

2.1 Qualified Person/Professional

The process for selecting the qualified person/professional to prepare the CSMP considered whether the person was eligible to hold a *Heritage Conservation Act* permit based on British Columbia (BC) Archaeology Branch requirements. The selection of the qualified person considered their training, experience and familiarity with the Project's environmental assessment.

Implementation of the CSMP will require a Professional Archaeologist authorized by the Archaeology Branch to hold HCA Section 12.2 and Section 12.4 Permits in the Project area. A qualified archaeologist will be retained through the life of the Project to hold the necessary HCA permits, oversee archaeological assessments, including monitoring, and assist with assessing potential Chance Finds. They will also be involved in on-going consultation with the Indigenous groups on matters of archaeology and cultural heritage.

2.2 Linkages to Other Management and Monitoring Plans

The CSMP is interconnected with three other EAC plans that relate to cultural heritage as follows:

- EAC Condition 15 (Indigenous Cultural Awareness and Recognition) requires BW Gold to consult with Aboriginal Groups to identify opportunities for cultural awareness and recognition. Such opportunities may include holding ceremonies, installing signage, executing cultural protocols, recognizing cultural heritage, or providing cultural awareness training to employees. Identifying these opportunities will help deepen BW Gold's understanding of Indigenous values and allow these values to be integrated into Project activities including cultural awareness training to employees.

- EAC Condition 16 (Aboriginal Engagement Plan) requires the development of an Aboriginal Group Engagement Plan to outline the means by which BW Gold will engage with each Aboriginal Group on the implementation of various requirements under the EAC during the life of the Project.
- EAC Condition 17 (Aboriginal Groups Monitor and Monitoring Plan) provides for an approach to identify and retain Aboriginal Monitors, the scope of Aboriginal Monitors' activities, and the terms of engagement for all Aboriginal Monitors. Aboriginal Monitor(s) responsibilities will include monitoring impacts on cultural heritage resources and cultural or historical heritage sites. Accordingly, Aboriginal Monitor(s) will allow for continued discussions with respect to Aboriginal Groups' cultural heritage throughout the Project and will ensure that groups have the opportunity to voice their values with respect to monitoring activities, including the monitoring of cultural heritage sites and resources.

The information identified in Conditions 16 and 18 may in some cases inform the practices identified in Condition 15. In many respects, Condition 17 provides the program for ensuring that Conditions 15 and 18 are appropriately implemented.

3. ROLES AND RESPONSIBILITIES

BW Gold has the obligation of ensuring that all commitments are met and that all relevant obligations are made known to mine personnel and site contractors during all phases of the mine life. A clear understanding of the roles, responsibilities, and level of authority that employees and contractors have when working at the mine site is essential to meet Environmental Management System (EMS) objectives.

Table 3-1 provides an overview of general environmental management responsibilities during all phases of the mine life for key positions that will be involved in environmental management. Other positions not specifically listed in Table 3-1 but who will provide supporting roles include independent environmental monitors, an Engineer of Record (EOR) for each tailings storage facility and dam, an Independent Tailings Review Board (ITRB), TSF qualified person, geochemistry qualified professional, and other qualified persons and qualified professionals.

Table 3-1: Blackwater Gold Roles and Responsibilities

Position	Responsibility
Chief Executive Officer (CEO)	The CEO is responsible for overall Project governance. Reports to the Board.
Chief Operating Officer (COO)	The COO is responsible for engineering and Project development and coordinates with the Mine Manager to ensure overall Project objectives are being managed. Reports to CEO.
Vice President (VP) Environment & Social Responsibility	The VP is responsible for championing the Environmental Policy Statement and EMS, establishing environmental performance targets and overseeing permitting. Reports to COO.
General Manager (GM) Development	The GM is responsible for managing project permitting, the Project's administration services and external entities, and delivering systems and programs that ensure Artemis's values are embraced and supported, Putting People First, Outstanding Corporate Citizenship, High Performance Culture and Rigorous Project Management and Financial Discipline. Reports to COO.
Mine Manager	The Mine Manager, as defined in the <i>Mines Act</i> , has overall responsibility for mine operations, including the health and safety of workers and the public, EMS implementation, overall environmental performance and protection, and permit compliance. The Mine Manager may delegate some of their responsibilities to other qualified personnel. Reports to GM.
Construction Manager (CM)	The CM is accountable for ensuring environmental and regulatory commitments/ and obligations are being met during the construction phase. Reports to GM.
Environmental Manager (EM)	The EM is responsible for the day-to-day management of the Project's environmental programs and compliance with environmental permits, updating EMS and MPs. The EM or designate will be responsible for reporting non-compliance to the CM, and Engineering, Procurement and Construction Management (EPCM) contractor, other contractors, the Company and regulatory agencies, where required. Supports the CM and reports to Mine Manager.
Departmental Managers	Departmental Managers are responsible for implementation of the EMS relevant to their areas. Report to Mine Manager.
Indigenous Relations Manager	Indigenous Relations Manager is responsible for Indigenous engagement throughout the life of mine. Also responsible for day-to-day management and communications with Indigenous groups. Reports to VP Environment & Social Responsibility.
Community Relations Advisor	Community Relations Advisor is responsible for managing the Community Liaison Committee and Community Feedback Mechanism. Reports to Indigenous Relations Manager.

Position	Responsibility
Environmental Monitors	Environmental Monitors (includes Environmental Specialists and Technicians) are responsible for tracking and reporting on environmental permit obligations through field-based monitoring programs. Report to EM.
Aboriginal Monitors	Aboriginal Monitors are required under EAC condition 17 and will be responsible for monitoring for potential effects from the Project on the Indigenous interests. Indigenous Monitors will be involved in the adaptive management and follow-up monitoring programs. Report to EM.
Employees and Contractors	Employees are responsible for being aware of permit requirements specific to their roles and responsibilities. Report to Departmental Managers.
Qualified Professional and Qualified Persons	Qualified professionals and qualified persons will be retained to review objectives and conduct various aspects of environmental and social monitoring as specified in EMPs and social management plans (MPs).

BW Gold will employ a qualified person as an EM who will ensure that the EMS requirements are established, implemented and maintained, and that environmental performance is reported to management for review and action. The EM is responsible for retaining the services of qualified persons or qualified professionals with specific scientific or engineering expertise to provide direction and management advice in their areas of specialization. The EM will be supported by a staff of Environmental Monitors that will include Environmental Specialists and Technicians and by a consulting team of subject matter experts in the fields of environmental science and engineering.

During the Construction phase, BW Gold will be entering into multiple EPC contracts, likely for the Transmission Line, Process Plant, Tailings and Reclaim System, and 25kV Power Distribution. Each engineer/contractor will have their own CM and there will be a BW Gold responsible PM and/or Superintendent who ultimately reports to the GM Development. Some of the scope, such as the TSF and Water Management Structures will be self-performed by BW Gold, likely using hired equipment. Other smaller scope packages may be in the form of EPCM contracts. The EPCM contractors will report to the CMs who will ultimately be responsible for ensuring that impacts are minimized, and environmental obligations are met during the Construction phase. For non-EPCM contractors, who will perform some of the minor works on site, the same reporting structure, requirements, and responsibilities will be established as outlined above. BW Gold will maintain overall responsibility for management of the construction and operation of the mine site and will therefore be responsible for establishing employment and contract agreements, communicating environmental requirements, and conducting periodic reviews of performance against stated requirements.

The CM is accountable for ensuring that environmental and regulatory commitments/obligations are being met during the construction phase. The EM will be responsible for ensuring that construction activities are proceeding in accordance with the objectives of the EMS and associated MPs. The EM or designate will be responsible for reporting non-compliance to the CM and EPCM contractor, other contractors, and regulatory agencies, where required. The EM or designate will have the authority to stop any construction activity that is deemed to pose a risk to the environment; work will only proceed when the identified risk and concern have been addressed and rectified.

Environmental management during operation of the Project will be integrated under the direction of the EM, who will liaise closely with departmental managers and will report directly to the Mine Manager. The EM will be supported by the VP of Environment and Social Responsibility in order to provide an effective and integrated approach to environmental management and ensure adherence to corporate environmental standards. The EM will be accountable for implementing the approved MPs and reviewing them periodically for effectiveness. Departmental area managers (e.g., mining, milling, and plant/site services) will be directly

responsible for implementation of the EMS and EMPs relevant to their areas. All employees and contractors are responsible for daily implementation of the practices and policies contained in the EMS.

During closure and post-closure staffing levels will be reduced to align with the level of activity associated with these phases. Prior to initiating closure activities, BW Gold will revisit environmental and health and safety roles and responsibilities to ensure the site is adequately resourced to meet permit monitoring and reporting requirements. The Mine Manager will have overall responsibility for closure and post-closure activities at the mine site.

Pursuant to Condition 19 of the Project's EAC #M19-01, BW Gold has established an Environmental Monitoring Committee to facilitate information sharing and provide advice on the development and operation of the Project, and the implementation of EAC conditions, in a coordinated and collaborative manner. Committee members include representatives of the Environmental Assessment Office (EAO), UFN, LDN, NWFN, StFN, SFN, NFN, Ministry of Energy, Mines and Low Carbon Innovation (EMLI), Ministry of Environment and Climate Change Strategy (ENV) and Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD).

Pursuant to Condition 17 of the EAC, Aboriginal Group Monitor and Monitoring Plan, BW Gold will retain or provide funding to retain a monitor for each Aboriginal Group prior to commencing construction and through all phases of the mine life. The general scope of the monitor's activities will be related to monitoring for potential effects from the Project on the Aboriginal Group's Aboriginal interests.

4. COMPLIANCE OBLIGATIONS, GUIDANCE AND BEST MANAGEMENT PRACTICES

4.1 Legislation

Federal legislation applicable to heritage resources includes:

- *Canadian Environmental Assessment Act, 2018*; and
- *United Nations Declaration on the Rights of Indigenous Peoples Act*.

Provincial legislation and other key requirements applicable to heritage resources include:

- *Coroners Act*;
- *Cremation, Internment and Funeral Services Act*;
- *Declaration on the Rights of Indigenous Peoples Act*;
- *Environmental Assessment Act*;
- *Forest and Range Practices Act*;
- *Forest Planning and Practices Regulation*;
- *Freedom of Information and Protection of Privacy Act*;
- *Heritage Conservation Act*;
- *Land Act*;
- *Fossil Definition Regulation*;
- *Local Government Act*;
- *Mineral Tenure Act*;
- Mineral Definition Modification Regulation;
- *Mines Act*; and
- Health, Safety and Reclamation Code for Mines in British Columbia (EMLI 2021).

4.1.1 Heritage Conservation Act

Section 12.1 of the *Heritage Conservation Act* 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. Part 1 Section 4 of the *Heritage Conservation Act* 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 Act.

Permits issued under sections 12.2 and 12.4 of the *Heritage Conservation Act* include heritage investigation and inspection permits:

- Heritage inspections 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 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.

4.2 Compliance with Environmental Assessment Certificate and Federal Decision Statement Conditions

The CSMP addresses the requirements in EAC Condition 18 (Cultural and Spiritual Resources Management Plan) and DS Condition 7 (Physical and Cultural Heritage and Structures, Sites or Things of Historical, Archaeological, Paleontological or Architectural Significance). Concordance tables identifying where the requirements in EAC Condition 18 and DS Condition 7 are provided in Appendix A and Appendix B, respectively.

The CSMP plan has been prepared and reviewed by qualified persons/qualified professionals. The reviewer of the plan is a registered archaeologist in BC and has 15 years of archaeology experience in BC.

4.3 Existing Permits

BW Gold received *Mines Act* Permit M-246 on June 22, 2021, authorizing early construction works for the Project. 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.

Archer CRM Partnership has received Heritage Inspection Permit 2021-0322, which authorizes archaeological inspections for the Blackwater mine area and transmission line.

4.4 Guidelines and Best Management Practices

Guidelines and best management practices related to cultural heritage resources include:

- BC Archaeological Impact Assessment Guidelines (Archaeology Branch 1998);
- BC Fossil Management Framework (n.d.); and
- Technical Guidance for Assessing Physical and Cultural Heritage or and Structure, Site or Thing (CEA Agency 2015).

5. ADAPTIVE MANAGEMENT FRAMEWORK

The CSMP is a living document that will evolve over time in response to feedback from Indigenous groups, monitoring results, chance finds, and the results of archaeological impact assessments (AIAs). The plan incorporates adaptive management as follows:

■ Plan

- Prior to site disturbance, complete AIA(s) within or adjacent to Project components that have not been previously assessed due to changes to infrastructure footprints to identify heritage sites.
- Engage with Indigenous groups to identify cultural and spiritual sites and related mitigation measures.
- Engage with Indigenous groups to determine confidentiality or known sites.

■ Do

- Implement training.
- Implement mitigation measures for known Heritage Resources.
- Implement Archaeology and Cultural Heritage Chance Find Procedure (Chance Find Procedure).

■ Monitor

- In line with the Aboriginal Group Monitor and Monitoring Plan
- Maintain records to document monitoring of heritage sites and chance finds.
- Implementation of CSMP.
- Document any contraventions of the CSMP.

■ Adjust

- EM review of effectiveness of prevention measures.
- In line with incorporation of input from the Aboriginal Group Monitor and Monitoring Plan.
- Update the CSMP as required (Section 12).

6. TRAINING

Employees and contractors will receive information related to heritage resources previously identified on site as well as cross-cultural training on the history of local Indigenous nations and training on the Chance Find Procedure on their arrival on site through an environmental on-boarding training session and prior to the start of work as part of the Site Orientation. The purpose of this training is to provide site personnel with a basic level of awareness related to heritage, spiritual and archaeological resources and an understanding of their obligations regarding compliance with plan, regulatory requirements, commitments and best practices.

Site supervisors will be provided with a copy of the CSMP and will receive additional training with respect to the Chance Find Procedure (Appendix C).

BW Gold will regularly review and update the training and awareness related to the plan based on changes in training needs and regulatory requirements.

If additional No Work Zones are identified during the course of the Project, this information will be provided to employees and contractors and maps will be updated accordingly. If there is an immediate potential for impact then work in the area will stop until the No Work Zones have been provided and delineated. Information on additional No Work Zones will be communicated through the BW Gold EM to the Departmental Manager and Indigenous Relations Manager.

7. BASELINE HERITAGE RESOURCE INFORMATION

An AIA under *Heritage Conservation Act* Permit #2012-0295 was undertaken in fall 2012 and summer 2013, which covered the mine site footprint and Project linear infrastructure (AMEC 2013). Known palaeontological, historic and CMTs within the mine site and 150 metres (m) of the transmission line alignment centreline are shown on Figures 7-1 and 7-2 and described below. Archaeological sites are described below but cannot be shown on public documents.

Land use and knowledge reports were also reviewed, including the following:

- *Stellat'en First Nation Land and Resource Use Study Report. Proponent Version for New Gold Incorporated* (Anderson 2014),
- *An Ethnohistory of the Lhoosk'uz Dene Nation Traditional Territory* (Dewhirst 2013),
- *Skin Tyee First Nation Traditional Land Use Study for New Gold Inc's Proposed Blackwater Project* (DMCS and Skin Tyee First Nation 2015),
- *Nadleh Whut'en First Nation: Knowledge and Use Study Non-Confidential Report, New Gold's Proposed Blackwater Gold Project* (Olson and DeRoy 2016)
- *Ulkatcho First Nation and Lhoosk'uz Dené Nation: Part C Blackwater Gold Mine Project* (Keefer Ecological Services Ltd 2019).
- *Ulkatcho First Nation Traditional Land Use and Ecological Knowledge of the proposed New Gold Inc. Blackwater Project Final Report (Public)* (DMCS and Ulkatcho First Nation 2013), and
- *Traditional Land Use and Occupancy: For the New Gold Inc. – Blackwater Project.* (Thomas 2015).

7.1 Known Archaeological Resources

There are five known archaeological sites located within the mine site boundary (Table 7.1-1) and 23 known archaeological sites within 150 m of the transmission line alignment centreline (Table 7.1-2).

Table 7.1-1: Known Archaeological Sites within the Mine Site

Borden Number	Site Type	Mine Site Component	Distance from Mine Site Component (m)	Permit Number
FhSe-73	Lithic Scatter and Cultural Depression	Northern Diversion Road	125	2012-0295
FhSe-74	Lithic Scatter	Mine Access Road	65	2012-0295
FhSf-4	Lithic Scatter	North Interception Trench	0	2012-0295
FhSf-7	Lithic Scatter	Central Diversion Channel North	930	2012-0295
FhSf-8	Cache Pit	Central Diversion Channel North	970	2012-0295

Table 7.1-2: Known Archaeological Sites within 150 m of the Transmission Line Alignment Centreline

Borden Number	Site Type	Distance from Transmission Line Centreline (m)	Permit Number
FhSe-43	Messue Trail	0	2000-0129, 2001-0171
FhSe-60	Lithic Scatter and Cache Pit	20	2002-0104
FjSd-16	Lithic Scatter	2	2021-0322
FjSd-17	Lithic Scatter	30	2021-032
FjSd-18	Lithic Scatter	6	2021-0322
FjSe-17	Lithic Scatter	26	2021-0322
FjSe-18	Cache Pit; Lithic Scatter	0	2021-0322
FjSe-19	Lithic Scatter	19	2021-0322
FjSe-20	Cache Pit; Lithic Scatter	54	2021-0322
FkSe-21	Trail	0	2021-0322
FkSe-70	Lithic Scatter	3	2021-0322
FkSe-71	Lithic Scatter; Faunal; Hearth	12	2021-0322
FkSf-35	Cheslatta Trail	0	2009-0106
FkSf-45	Lithic Scatter	92	2011-0076
FkSf-47	Lithic Scatter	34	2021-0322
FkSf-48	Lithic Scatter	3	2021-0322
FjSe-20	Lithic Scatter	39	2021-0322
GaSf-6	Lithic Scatter	121	1982-0030
GaSf-43	Cache Pit	17	2012-0295
GaSf-44	Cache Pit	76	2012-0296
GaSf-45	Cache Pit	16	2012-0295
GaSf-46	Cache Pit	13	2012-0295
GaSg-2	Cemetery	99	1982-0030

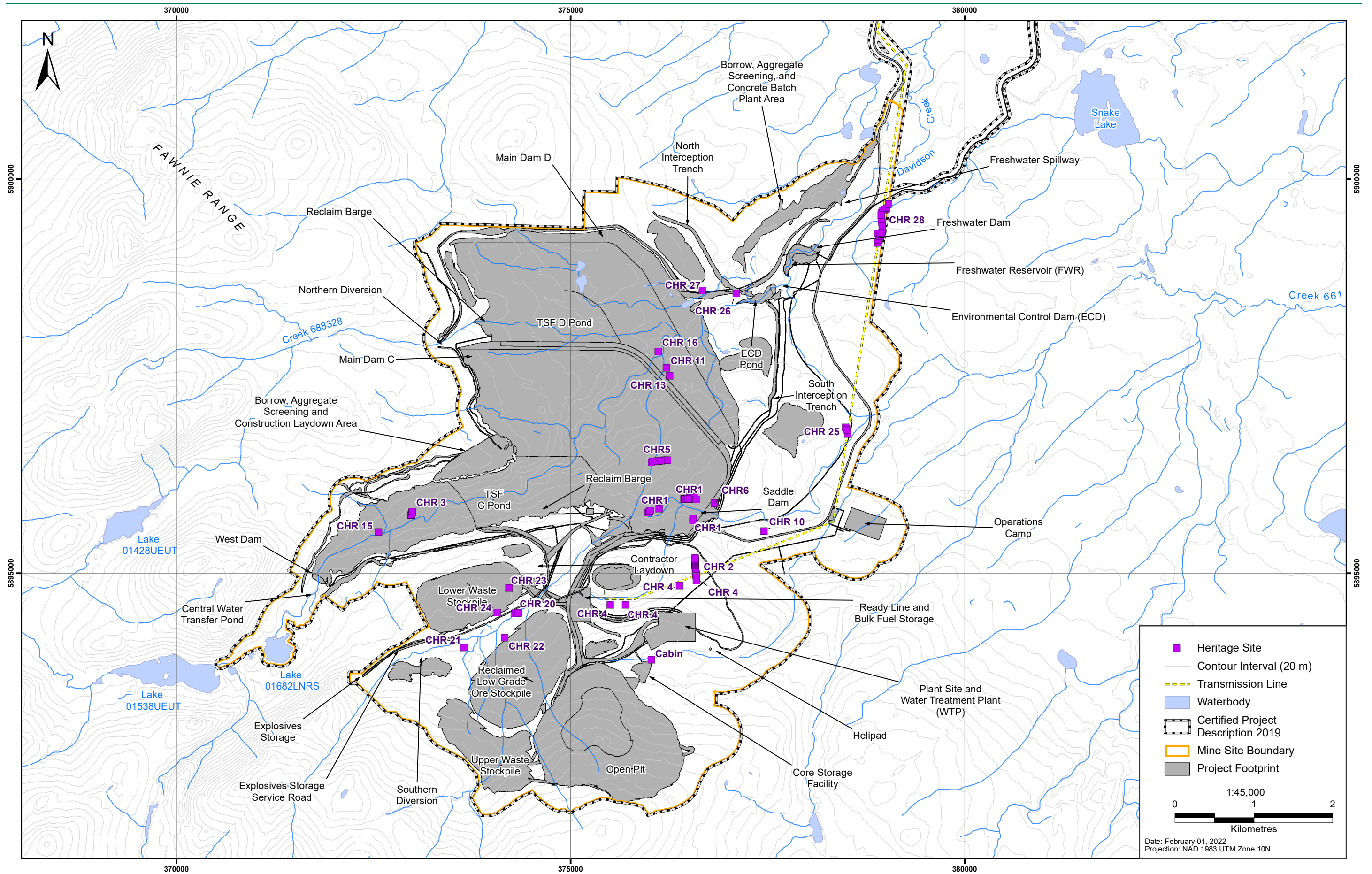


Figure 7-1: Known Cultural Heritage Resources within Mine Site

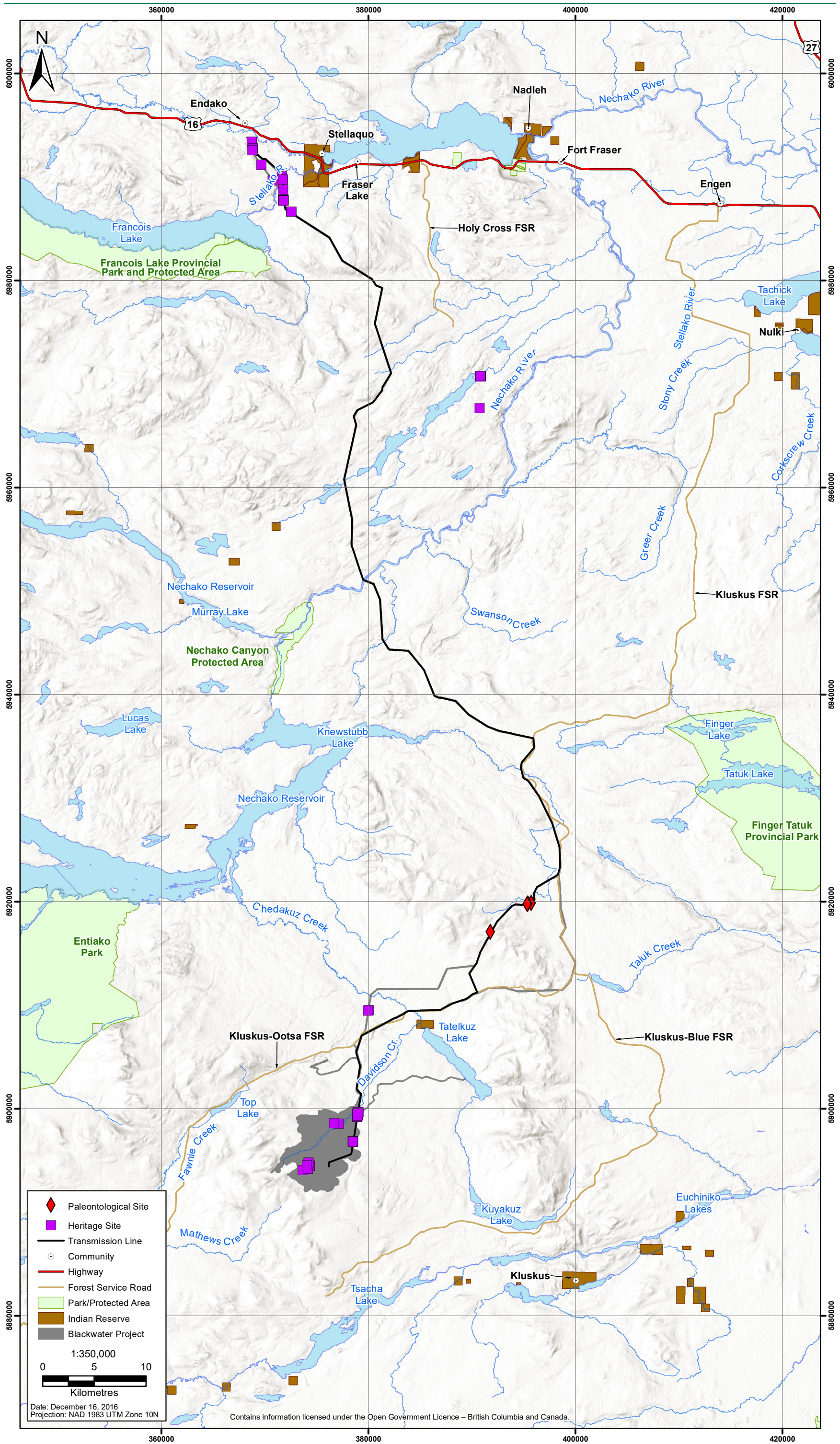


Figure 7-2: Known Cultural Heritage Resources within Transmission Line Alignment

7.2 Known Cultural Heritage Resources

There are 20 CMTs and one historic cabin within the mine site (Table 7.2-1; Figure 7-1). There are eight CMTs within 150 m of the transmission line alignment centreline outside the mine site (Table 7.2-2; Figure 7-2).

Table 7.2-1: Historic Cultural Heritage Resources (CHRs) within the Mine Site

CHR#	Type ¹	Year ^{2,3}	Description	Distance to Infrastructure	Infrastructure
1	BSO	Unknown	21 blazes on two NE/SW trending terraces. Likely from mineral exploration	0	TSF
2	BSO	Unknown	19 N/S trending blazes. Likely from mineral exploration	3	Transmission Line
3	BSO	Unknown	5 historic blazes trending NW/SE for 50 m towards Davidson Creek	0	TSF
4	BSO	Unknown	4 blazed trees trending N/S over 1.1 km	48	Transmission Line
5	BSO/BSD	Unknown	8 blazed trees trending E/W over 200 m	0	TSF
6	BSL	1897/1907 (+/- 10 years)	Two standing dead trees	0	TSF
10	Bound	Unknown	Single "bound" CMT	75 m north	Access Road
11	Bound	Unknown	Single "bound" CMT	0	TSF
13	Bound	Unknown	Bound CMT	0	TSF
15	BSO	Unknown	Advanced state of decay. Unable to date.	0	TSF
16	BSL	Unknown	Advanced state of decay. Unable to date.	0	TSF
20	BLO	Unknown	4 blazed trees in linear alignment suggesting association with mineral exploration.	101 m northeast	Low Grade Ore Stockpile
21	BLO	<30	2 blazed trees in linear alignment suggesting association with mineral exploration	173 m southeast	Mine Site Road
22	BLO	<20	3 chainsaw cut blazed trees in linear alignment suggesting association with mineral exploration	0	Low Grade Ore Stockpile
23	BLO	<20	1 chainsaw cut blazed tree located on a game trail.	0	Lower Waste Stockpile
24	BLO	Unknown	6 blazed trees in linear alignment suggesting association with mineral exploration	70 m north	Low Grade Ore Stockpile
25	N/A	Unknown	11 blazed trees in linear alignment suggesting association with mineral exploration	0	Transmission Line

CHR#	Type ¹	Year ^{2,3}	Description	Distance to Infrastructure	Infrastructure
26	Shaped	Post 1935	1 CMT sampled	10 m south	Mine Site Road
27	Shaped	Post 1993	1 CMT sampled	36 m north	Mine Site Road
28	BSO	1936-1993	Trees along a well used trail	0	Transmission Line
Cabin	Cabin	1940-1980	Log cabin foundation and kitchen wares	17 m north	Core Storage Facility

¹ BSO: Barked Stripped Oval, BSD: Bark Stripped Diamond, BSL: Bark Stripped Lenticular, BLO: Blaze Oval.

² The CMTs referenced in the table were identified in the EA submission as post-1846. The Year Modified is noted as 'Unknown' if the tree was not cored during the AIA and therefore the date is unknown. In these instances, professional judgement may have been used to determine if the tree pre-dated 1846.

³ It is difficult to determine the exact date of the CMT if the tree is too rotten or if in the professional opinion of archaeologist, the scar obviously post-dates 1846. This determination is often made based on the age of the tree or the nature of the modification.

Table 7.2-2: Historic Cultural Heritage Resources (CHRs) within 150 m of the Transmission Line Alignment Centreline

CHR#	Type ¹	Year Modified ^{2,3}	Description	Distance from Transmission Line Centreline (m)
32	BSR/BS/BSO	Unknown	1 cambium-stripped standing lodgepole pine, with a rectangular scar and two oval blazes. 1 standing tree in a previously harvested forestry cutblock; blazes on east and west sides of tree.	0
33	BSO	Unknown	1 standing lodgepole pine with two oval blazes. 2 more blazed trees outside proposed transmission line; approximately linear alignment suggests association with forestry practice.	16
38	BSL	Unknown	3 bark- stripped lodgepole pine. Approximate linear alignment suggests association with forestry practice.	112
40	Unknown	Unknown	1 box trap. Recent trap, located on tree; lure (fish) still on wire inside trap.	50
42	Unknown	Post 1978	1 shaped spruce. Increment core indicates modification date after 1978.	26
43	BSL	Unknown	1 lodgepole pine with lenticular barkstrip scarring. Located at base of a steep slope; advanced state of decay precluded dating.	18
44	BS/BSL/BSO	Unknown	8 standing and 1 fallen dead barkstripped lodgepole pine. Advanced state of decay precluded dating.	0
45	BST	1945	2 spruce trees with triangular barkstrip scars. Two trees within 5 m of each other; 1 with 2 scar faces. Attempts were made to date both trees; one tree yielded a modification date of 1945.	34

¹ BSO: Barked Stripped Oval, BSD: Bark Stripped Diamond, BSL: Bark Stripped Lenticular, BLO: Blaze Oval.

7.3 Known Spiritual Sites

Subject to further consultation with Indigenous groups, there are three known spiritual resources near the Project area with cultural importance and spiritual properties. No direct impacts are currently anticipated at the known spiritual sites. Indigenous representatives and/or Indigenous Knowledge Holders from the affected Indigenous groups will be also be invited to identify any impacts to these spiritual resources that by the Project. If potential impacts are identified the cultural importance and spiritual properties of these resources will be acknowledged through ceremony and preserved to the extent possible. If sites are confidential they will be represented, including an appropriate buffer, by only by the “No Work Zone” designation on Project maps and documents.

7.3.1 Mount Davidson and Tsacha Mountain

The following information is from Keefer Ecological Services (2019):

“Mount Davidson is highly respected by our communities for the food it provides and the healing ceremonies that occur at the mountain. Members of the Baptiste family (with rights to the BaptisteCassam keyoh; Figure 4) recount times when an Elder would guide them to a place on the mountain to sit for 3-4 days under a ts’oo (spruce) tree to fast. There is concern within our communities that the protocols for visiting these sacred places will not be followed by newcomers (personal communication, community meeting notes, March, 2017). Mount Davidson is also an important gathering area for certain higher-elevation medicinal plants (personal communication, community meeting notes, April 2017). Mount Davidson and Tsacha Mountain, which is found just south of Mount Davidson, are collectively referred to as Ts’oodenla; meaning “sounds like two mountains together” or “something piled up like a mountain” as there is not a separate traditional name for each individual mountain (personal communication, LDN Band member, May, 2017; Dewhirst, 1995). An LDN community member recounts times when his family would camp at Mount Davidson to hunt and gather food and medicinal plants. When asked about the potential environmental effects of the mine, he indicated that his family is unlikely to return to Mount Davidson, Salmon House Falls, Takia Creek, or Dean River to participate in these traditional practices following the development of the Project (LDN Band member, personal communication, May, 2017). Another member of the Baptiste family has recounted stories of her family hunting whudzih (caribou) at Mount Davidson, describing a rock feature that was intentionally built to aid in the corralling of whudzih (caribou), as part of her family’s hunting strategy. Her mother’s knowledge of the location of this significant cultural feature within their keyoh (the Baptiste-Cassam keyoh; Figure 4) puts it close to the proposed pit location for the Project.”

7.3.2 Tatelkuz Lake

Tatelkuz Lake was used by Indigenous groups for ceremonial purposes and the cremation of family members. Cremated remains were carried by relatives for a year and then scattered in this area. Berries and medicinal plants are also collected on the south and south-east sides of the Lake (ERM 2016). There are no known heritage sites within 150 m of the freshwater supply system where it enters Tatelkuz Lake.

7.3.3 Kuyakuz Mountain and Kuyakuz Lake

The following information is from Part C of the EAO Assessment Report (EAO 2019a):

“K’ai k’uz (Kuyakuz Mountain), just east of the proposed mine site, is a sacred crematory mountain for LDN and is a “no-go” zone with respect to industrial development and other public land use. Along the south and eastern flanks of K’ai k’uz (Kuyakuz Mountain) lies Kuyakuz Lake, where a number of sacred sites and burials, in addition to a historical fishing site and a fish weir, exist along the shore (Dewhirst, 1995; Tobias, 2012). There are a number of other “very powerful” sacred sites along the

Grease Trail and throughout our traditional territories. These sites range from absolutely do not enter, to ones that you can enter, but only after a set of protocols have been followed. The sites also have limitations on what can occur on them. For instance, there are sites where you can enter and sleep within the areas as long as the respectful protocol was followed before entering. There are other sites where you can cross over the area after the respective protocol was followed, but you are not allowed to sleep on the site (personal communication, LDN community members, April, 2013; Dewhirst, 1995).

7.4 Known Paleontological Sites

There are no known paleontological sites within the mine site and four known paleontological sites within 150 m of the transmission line alignment centreline (Table 7.4-1).

Table 7.4-1: Paleontological Sites within 150 m of the Centreline of the Transmission Line Alignment

Paleontological Resources	Fossil Type	Distance from Transmission Line Centreline (m)
C-056986	Bivalves, belemnites	101
C-143722	Ammonids, bivalves, gastropods, ichnofossil	10
C-177438	Ichthyoliths, gastropod, bivalves	7
C-203467	Bivalves, plant	64

8. PROTECTION MEASURES

Avoidance of cultural heritage sites is always the preferred option. Impact of the Project on cultural heritage sites will be minimized through the implementation of the measures discussed below. If known archaeological sites protected under the *Heritage Conservation Act* are impacted without mitigation measures carried out in advance under a *Heritage Conservation Act* permit then penalties may be levied in accordance with applicable law.

8.1 Known Sites

8.1.1 Archaeological Sites

There are known archaeological sites within the mine site and 150 m of the transmission line alignment (Section 7.1). The following measures will be undertaken for Project activities located within 0 to 50 m of a known site:

- Flag or delineate an area of at least 50 m around the site and mark as a “No Work Zone” from the site boundary to align with Archaeology Branch’s Remote Access to Archaeological Data areas of high archaeological potential.
- Construction monitoring (Section 8.1.1) in the buffer around the site.
- If the impacts to the site will occur then mitigation must be conducted prior to impact. Procedures to record, analyse and mitigate effects on a site will be determined in consultation with the BC Archaeology Branch and affected Indigenous groups as per the *Heritage Conservation Act* permit and carried out by an archaeologist under a *Heritage Conservation Act* (Section 12.2 heritage investigation and/or Section 12.4 site alteration permits). Mitigation measures will be dependent on the specifics of the archaeological site and the levels of impact. Mitigations generally involve detailed mapping, photography, and systematic data recovery through surface collection and controlled excavations of evaluative units if subsurface deposits are present.
- Any artifacts collected during archaeological assessment will be sent to the Exploration Place Museum and Science Centre in Prince George, BC or another approved repository identified in the relevant Section 12.2 or 12.4 permit under the *Heritage Conservation Act*.

The following measures will be taken for Project activities located within 50 and 150 m of a known site:

- Flag or delineate an area of at least 50 m around the site boundary and mark as a “No Work Zone”.
- Annual monitoring (Section 10.2.2) of the known sites.

8.1.2 Historic Site

There is one documented historic cabin site within the mine site (Section 7.2; Figure 7-1). If avoidance is determined to be not possible through final design and permitting, and artifacts or features associated with this site will be impacted, Indigenous groups and the local museum will be consulted and given the opportunity to collect/preserve artifacts associated with this site.

8.1.3 Culturally Modified Tree Sites

There are known post-1846 CMT sites within the mine site and within 150 m of the transmission line alignment centreline that may be impacted by Project infrastructure (Section 7.2; Figure 7-1). Prior to alteration to post-1846 CMTs, the relevant/affected Indigenous groups will be consulted to determine the preferred mitigation measures. Common mitigation measures for post-1846 CMTs with cultural significance include:

detailed measurements and photography, removing and preserving the modified portion of the tree, or removing a cross-section (cookie) of the modified portion of the tree. These measures allow for the preservation of some or all of the information about the modification(s) made to the tree.

8.1.4 Trails

There are known trails located along the proposed transmission line routes. Prior to the alteration of a trail, the relevant/affected Indigenous communities will be consulted to determine the preferred mitigation measures. Possible mitigation measures for recording trails include photography and detailed mapping of the route and surrounding features.

8.1.5 Paleontological Sites

There are no known paleontological sites located within the mine site and four palaeontological sites within 150 m of the proposed transmission line routes (Section 7.3; Figure 7-2). A preliminary Fossil Impact Assessment will be conducted prior to construction to determine if additional studies are required. If paleontological materials are recovered, the BC Fossil Management Office will be consulted to determine an appropriate repository.

8.2 As-yet Unknown Sites

Archaeological assessments will be conducted in areas that fall outside of areas covered by AIAs prior to construction in these areas. Indigenous representatives and/or Indigenous Knowledge Holders from the affected Indigenous groups will be invited to be involved, and/or, identify representatives who will be involved, in the assessment.

Additional consultation with Indigenous groups specifically relating to the location and identification of cultural and spiritual resources within the Project footprint will be conducted prior to any further disturbance. Indigenous representatives and/or Indigenous Knowledge Holders from the affected Indigenous groups will be invited to identify an as-yet unknown cultural or spiritual resources that may be impacted by the Project (Section 9). If resources are identified the cultural importance and spiritual properties of these resources will be acknowledged through ceremony and preserved to the extent possible.

An Archaeological and Cultural Heritage Chance Find Procedure and reporting form is provided in Appendix C. Agreements respecting Indigenous customs and protocols respecting the discovery, handling, recognition, recording, transferring and safekeeping of unknown sites and confidentiality will be developed and in place prior to the commencement of Project construction.

8.3 Confidentiality

BW Gold will consult Indigenous groups on the manner by which to protect the confidentiality of a discovery, consistent with provincial laws. Confidentiality will be assessed in consultation with Indigenous groups on a case-by-case basis, and contents of discoveries will be treated as confidential among BW Gold, the Indigenous group(s) within whose traditional territory the find is made, the Archaeology Branch and the archaeologist until agreed otherwise. BW Gold understands that Indigenous groups retain rights to their knowledge, practices, and traditions, and how it is shared with others. Therefore, Indigenous Knowledge information will be gathered under confidentiality agreements which address the following:

- the roles and responsibilities of each party;
- conditions on sharing confidential Indigenous knowledge with other parties;
- limitations on who can access the Indigenous knowledge provided;

- how, where, and by whom the Indigenous knowledge would be stored, and for how long;
- any disposal procedures, including timing considerations for disposal;
- whether a non-confidential summary or redacted version of the Indigenous knowledge could be created and shared with the public;
- how the Indigenous knowledge should be reflected in reporting; and
- whether and how Indigenous knowledge could be used in monitoring and follow-up programs.

If a cultural or spiritual site is identified as confidential by Indigenous groups, an area of at least 50 m around the site from the site boundary will be flagged and depicted on Project maps and marked as a “No Work Zone”.

9. PROCESS FOR IDENTIFICATION OF CULTURAL AND SPIRITUAL AREAS OF IMPORTANCE

BW Gold consulted with Indigenous groups regarding spiritual sites and other areas of cultural importance during the EA. Known sites identified to BW Gold during and subsequent to the project's environmental assessment as described in Section 7.3 will form the basis of the discussion. Cultural or spiritual resources identified during consultation as part of Condition 15 will be considered in the implementation of this plan as appropriate.

BW Gold will continue to engage with Indigenous groups on implementation of this plan. As part of plan implementation, BW Gold will communicate to Indigenous groups on any new construction areas proposed for the year. This communication may be aligned with other required processes. As part of this annual engagement, BW Gold will:

- Use maps to describe the new construction areas, including the location of infrastructure and activities, any known cultural or spiritual sites and anticipated effects.
- Ask Indigenous groups if they are aware of any additional cultural or heritage sites that could be affected by the annual construction program.
- If additional cultural or spiritual sites are identified as potentially affected by the annual construction program, ask the Indigenous groups to:
 - identify and describe the cultural or spiritual site;
 - locate the resource on a map and include an appropriate buffer (at least 50 m);
 - if impacted by the Project, discuss mitigation(s); and
 - provide opportunities for Indigenous Knowledge Holders to communicate on the site(s) and potential mitigation, if requested by the Indigenous group.
- After this information has been gathered and mapped:
 - the Indigenous group will be asked to verify that the information has been correctly understood;
 - review the potential effects of the Project on the site and mitigations; and
 - discuss measures to keep information on the sites confidential if requested by Indigenous group.
- With the consent of the respective Indigenous Group and participation of Indigenous Knowledge Holders, BW Gold will seek to be informed about required ceremony or practices prior to visiting any cultural or spiritual sites and what protocols and procedures will take place when visiting the site.
- If consent to visit a site is not approved then BWGold will work with the Indigenous groups to identify a resolution or work together to develop mitigation measure that can be implemented.
- BW Gold will provide a summary report to the appropriate Indigenous group to confirm measures to keep the site location and site information confidential.

10. IMPLEMENTATION

Known and as-yet unknown sites (as identified by the chance find procedure) potentially affected by Project activities will be monitored as described in Section 10.2. Monitoring records will be maintained and reporting will be conducted as described in Section 11. Indigenous group representatives and/or Indigenous Knowledge Holders will be invited to be involved, and/or, identify representatives who will be involved, in the implementation of the CSMP. The CSMP will be provided to the EAO, IAAC, EMLI, ENV, Indigenous groups and FLNRORD prior to commencement of construction.

BW Gold will undertake monitoring during the Construction and Operations phases (infrastructure expansions to support increases to mill throughput) and annually. Monitoring will assess the effectiveness of the protection measures for known resources and the implementation of the Chance Find Procedure. If unforeseen impacts to heritage sites occur they will be immediately reported to the Project archaeologist and Indigenous groups and reviewed. Unforeseen impacts to heritage sites will be indicative of a lack of effectiveness of the protection measures. Based on the review, protection measures will be modified within 4 weeks. The CSMP will be updated to reflect the changes and communicated as per Section 12. Monitoring identified in Section 10.2.1 and 10.2.2 will be used to determine if altered or new mitigation measures are effectively mitigating effects or avoiding potential effects.

10.1 Transmission Line Archaeological Impact Assessment

Pursuant to Heritage Inspection Permit 2021-0322, an AIA was completed in the fall of 2021 over many area of the transmission line alignment that had not been surveyed due to changes made to the alignment during the environmental assessment in response to Indigenous concerns. The Aboriginal Groups were consulted on the proposed AIA and invited to participate in the AIA. The AIA will take into account BC's Archaeological Impact Assessment Guidelines (Archaeology Branch 1998).

Areas not covered by the 2021 AIA will be completed in 2022, including footprints of the final transmission line alignment and associated poles, roads and towers, which will inform final placement of these features.

Measures identified in Section 9 of this plan will be implemented to protect heritage resources identified within the footprint of the final transmission line alignment and associated facilities. This plan will be updated to incorporate the 2021 and 2022 AIA results. Any artifacts collected during the assessment will be sent to the Exploration Place Museum and Science Centre in Prince George, BC.

10.2 Monitoring

Heritage sites within 150 m of the Project footprint will be marked on Project site maps as a "No Work Zone" and an area of 50 m flagged or delineated around the site boundary (Section 8.1). Project activities within 50 m sites of will be subject to construction monitoring and sites located 50 to 150 m will be subject to annual monitoring. If sites are confidential they will be represented, including an appropriate buffer, developed in consultation with the Indigenous groups and the Project Archaeologist, by only the "No Work Zone" designation on Project maps and documents.

10.2.1 Construction Monitoring

Sites within 50 m of Project activities will be flagged as "No Work Zones" on the ground and monitored by the BW Gold EM and Aboriginal Monitors during construction in the vicinity of the site, including construction during the phased increases to the mill nameplate throughput. Should impacts be anticipated, or found within 50 m of a site, Indigenous groups and the Project Archaeologist will be contacted immediately to determine if additional mitigation measures are required prior further work in the area. The BW Gold EM will be engaged on the proposed mitigation measures.

Sites that are identified by Indigenous groups as confidential will be depicted as polygons, including an area of at least 50 m around the site, on Project maps and marked as a “No Work Zones” around the site but will not be delineated on the ground. These sites will be monitored by the Aboriginal Monitors during construction in the vicinity of the site, including construction during the phased increases to the mill nameplate throughput.

10.2.2 Annual Monitoring

For the life of the Project the BW Gold EM and Aboriginal Monitors will, on an annual basis, verify that known heritage sites remain intact and are not impacted by the Project and check the condition of site protection (i.e., flagging or fencing). Should impacts to the vegetation or ground surface since the previous observation be observed at sites, the Project Archaeologist and the Archaeology Branch will be contacted to determine mitigation measures. Should impacts be observed at heritage sites, the BW Gold EM will contact Indigenous Knowledge Holder(s) to discuss mitigation measures.

10.3 Site Access for Cultural and Spiritual Purposes

Access will be provided to Indigenous groups during all phases of the Project to the mine site for cultural purposes or for exercising Aboriginal rights, to the extent that such access and exercise of rights are safe.

In accordance with DS Condition 7.3, access will be provided within 24 hours of an access request being received by the Indigenous Relations Manager, unless access is not possible for safety reasons, BW Gold will respond to all requests for access within 12 hours of receipt. Access requests must be provided to BW Gold in writing, and must include the date and time of requested access, location(s) to be visited, support requested while on site, duration of requested access, number of people accessing the site and any other information that would support BW in determining whether access can be safely provided. BW Gold may be unable to provide access within 24 hours where incomplete access requests are received. Providing BW Gold with advanced warning of access requests (i.e., 7 days) will allow BW Gold to consider the request, plan, and increase the likelihood that access can be granted.

BW Gold Contacts:

Travis Desormeaux: Environmental Manager, 250-278-7788, tdesormeaux@artemisgoldinc.com

Don Thelston: Health and Safety Manager, dethelston@artemisgoldinc.com

10.4 Implementation Schedule

The CSMP will be implemented throughout the following phases:

- Construction phase: Year -2 to Year -1;
- Operations phase: Year +1 to Year +23; and
- Closure phase: Year +24 to Year +45.

BW Gold is of the view that an annual review of the CSMP provides adequate time to monitor the plan's implementation.

11. REPORTING AND RECORD KEEPING

Reporting is required under the *Heritage Conservation Act*, DS Condition 2.11-2.14, and EAC Conditions 5 and 18h. In addition, reporting will be completed in accordance with the Aboriginal Group Engagement Plan and Aboriginal Group Monitor and Monitoring Plan.

11.1 Reporting

Reporting will comply with *Heritage Conservation Act* permitting conditions and the Archaeological and Cultural Heritage Chance Find Procedure (Appendix C). Final permit reporting required under the Act will be submitted to the Archaeology Branch and Indigenous groups by the Project Archaeologist on, or before, the permit expiry. Site forms will be submitted by the Project Archaeologist within six weeks of the completion of site investigations. Interim reports will be submitted to the Archaeology Branch on an as required basis to provide management recommendations. The process for reporting information related to archaeological and cultural heritage resources to impacted Indigenous communities will be informed by agreements with Indigenous groups, where they are in place.

Reports will be provided in electronic format (MS Word or PDF) and via email. The following procedure will be followed for written reports:

- A written notice will be provided that:
 - includes a copy of the plan, program or other document including a summary written in plain language;
 - invites the party to provide its views on the content of such plan, program or other document; and indicates if there is a timeframe (no less than 15 days) for providing their views so that the party may provide such views to the Holder within such time frame;
 - undertakes a full and impartial consideration of any views and other information provided by a party.
- Following receipt of views or comment on the provided document a response will be prepared to:
 - provide a written explanation of how the views and information provided have been considered and addressed in a revised version of the plan, program or other document; or why the views and/or information provided have not been addressed in a revised version of the plan, program, or other document. Where views diverge, BW Gold will strive to reach consensus with Indigenous groups on implementation of the plan. The written explanation will be provided within 15 days unless otherwise agreed between BW Gold and the Indigenous groups;
 - maintain a record of consultation with each such party regarding the plan, program, or other document; and
 - provide a copy of consultation record to the EAO, IAAC and the relevant party, or both, promptly upon written request. The copy of such consultation record will be provided to the EAO, relevant party, or both, no later than 15 days after the Holder receives the request for a copy of the consultation record, unless otherwise authorized by the EAO.

11.1.1 *Federal Decision Statement Annual Reporting*

DS Conditions 2.11, 2.12 and 2.13 set out annual reporting requirements related to the implementation of conditions in the DS. Condition 2.14 sets out information sharing requirements related to the annual reports. Reporting will commence when BW Gold begins to implement the conditions set out in the DS. Requirements in DS Conditions 2.11 – 2.14 are presented below.

DS Condition 2.11 requires:

“The Proponent [BW Gold] shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:

- 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;*
- 2.11.2 how the Proponent complied with condition 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;*
- 2.11.4 the information referred to in conditions 2.5 and 2.6 for each follow-up program;*
- 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;*
- 2.11.6 any update made to any follow-up program in the reporting year;*
- 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*
- 2.11.8 any change(s) to the Designated Project in the reporting year.”*

DS Condition 2.12 requires:

“The Proponent [BW Gold] will provide the draft annual report to Indigenous groups, no later than June 30 following the reporting year to which the annual report applies. BW Gold will consult Indigenous groups on the content and findings in the draft annual report.”

DS Condition 2.13 requires:

“The Proponent [BW Gold], in consideration of any comments received from Indigenous groups pursuant to condition 2.12 shall revise and submit to the Agency [Impact Assessment Agency of Canada] and Indigenous groups a final annual report, including an executive summary in both official languages, no later than September 30 following the reporting year to which the annual report applies.”

DS Condition 2.14 requires:

“The Proponent [BW Gold] shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.11 and 2.13.

The Proponent shall keep these documents publicly available for 25 years following the end of decommissioning of the Designated Project. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.”

DS Condition 2.15 requires:

“When the development of any plan is a requirement of a condition set out in this Decision Statement, the Proponent [BW Gold] shall submit the plan to the Agency and to Indigenous groups prior to construction, unless otherwise required through the condition.”

11.1.2 *Environmental Assessment Certificate*

The procedure for providing written reports to Aboriginal Groups in accordance with the requirements of Condition 18(h) (implementation of the CSMP) is outlined below.

Condition 5 of the EAC sets out compliance self-reporting requirements. BW Gold will submit a report to the attention of the EAO and Aboriginal Groups on the status of compliance with the EAC at the following times:

- a. at least 30 days prior to the start of Construction;
- b. on or before March 31 in each year after the start of Construction;
- c. at least 30 days prior to the start of Operations;
- d. on or before March 31 in each year after the start of Operations;
- e. at least 30 days prior to the start of Closure;
- f. on or before March 31 in each year after the start of Closure until the end of Closure;
- g. at least 30 days prior to the start of Post-Closure; and
- h. on or before March 31 in each year after the start of Post-Closure until the end of Post-Closure.

BW Gold will submit reports to the EAO and Aboriginal Groups within the timelines specified in Condition 5 of the EAC #M19-01. The reports will report on status of compliance with the Project's EAC.

11.1.3 *Annual Monitoring Report*

A record of monitoring activities will be kept and the information will be summarized in an annual monitoring report. This report will include the monitoring results from the preceding year, any new sites identified, incidents where mitigation measures failed to protect heritage sites, and any resulting actions or mitigations undertaken and the results of those actions or mitigations. This report will be provided to the Project Archaeologist and Indigenous groups. The relevant information including chance finds will also be provided to the Archaeology Branch in reports required under Sections 12.2 and/or 12.4 of the *Heritage Conservation Act*. The EM, Project Archaeologist and/or Aboriginal Monitors will document by means of photographs and field notes, the type of construction and disturbance occurring near a site, weather conditions, personnel present, and/or other details. It is imperative that the following data be collected during construction and annual monitoring as information gathered may be required for inclusion in compliance reports:

- site photographs;
- coordinates for any disturbances;
- extent and type of disturbances;
- details of any actions taken to protect the sites;
- information received from Indigenous groups on handling and storage of finds in consideration of any laws, customs or protocols; and
- recommendations for any changes to the protective measures, if required.

11.2 *Record Keeping*

The BW Gold EM is responsible for data management and reporting related to heritage resources. The data management system will include the results from monitoring activities (Section 10.2), including chance finds, AIAs, No Work Zones that were established, and records documenting consultation with

Indigenous groups related to cultural heritage. The data management system will also record when monitoring results were provided to relevant parties as required by EAC and DS conditions. The EM will also report chance finds to the Project Archaeologist and Indigenous groups within 24 hours of a discovery. The Project Archaeologist will report chance finds to the BC Archaeology Branch.

Monitoring data will be entered into an electronic database and have quality control checks completed upon receipt of results. Data will be entered into a standard format that allows for data reporting and analyses. Data and data comparisons will be stored in a single file format for each type of survey or monitoring activity. Monitoring data will be stored for the life of the mine and will be made available for review upon request.

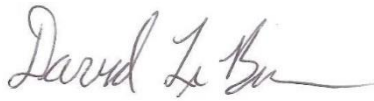
12. PLAN REVISION

The CSMP is a living document that will evolve over time in response to subsequent permitting, monitoring results, chance finds, and the results of AIAs. Comments provided by Indigenous groups, EMLI, ENV, and FLNRORD on the CSMP will also be considered for inclusion and incorporation and addressed in future versions of the CSMP as they become available. BW Gold will provide revised drafts of the CSMP to Indigenous groups, EMPR, ENV, and FLNRORD for review and comment a minimum of 30 days prior to submitting the revised CSMP to the EAO and IAAC. Revised copies of the plan will be provided to Indigenous groups, EMLI, ENV, and FLNRORD.

13. QUALIFIED PERSON OR QUALIFIED PROFESSIONAL

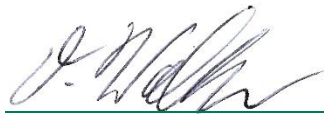
The process for selecting the qualified person to prepare the CSMP considered their training, experience and familiarity with the Project's environmental assessment. This management plan has been prepared and reviewed by the following qualified persons:

Prepared by:



David Le Beau, MA
Archaeologist
Consultant II, ERM

Reviewed by:



Dan Walker,
Consulting Archaeologist
Principal Consultant, ERM

14. REFERENCES

Definitions of the acronyms and abbreviations used in this reference list can be found in the Acronyms and Abbreviations section.

Legislation

Coroners Act, SBC 2007, c 15.

Cremation, Interment and Funeral Services Act, SBC 2004, c 35

Declaration on the Rights of Indigenous Peoples Act, SBC 2019, c 44.

Environmental Assessment Act, SBC 2018, c 51.

Forest and Range Practices Act, SBC 2002, c 69.

Forest Planning and Practices Regulation, BC Reg 14/2004.

Freedom of Information and Protection of Privacy Act, RSBC 1996, c 165.

Fossil Definition Regulation, BC Reg 214/2011

Heritage Conservation Act, RSBC 1996, c 187.

Impact Assessment Act, SC 2019, c 28.

Land Act, RSBC 1996, c 245.

Local Government Act, RSBC 1996, c 323.

Mineral Tenure Act, RSBC 1996, c 292.

Mineral Definition Modification Regulation, BC Reg 5/2005.

Mines Act, RSBC 1996, c 293.

United Nations Declaration on the Rights of Indigenous Peoples Act, SC 2021, c 14.

Wildlife Act, SBC 1996, c 31.

Secondary Sources

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AMEC Foster Wheeler Environment & Infrastructure (AMEC). 2017. *New Gold – Blackwater Gold Project. Archaeological Impact Assessment Permit Report 2012-0295*. Prepared for New Gold Inc. by AMEC Foster Wheeler Environment & Infrastructure. Burnaby, British Columbia. Canada.

Anderson, B. 2014. *Stellat'en First Nation Land and Resource Use Study Report. Proponent Version for New Gold Incorporated*. Prepared for Stellat'en First Nation.

Archaeology Branch. 1998. *British Columbia Archaeological Impact Assessment Guidelines*. Electronic document: [archaeological_impact_assessment_guidelines.pdf \(gov.bc.ca\)](https://www2.gov.bc.ca/gov/content/soc/culture/archaeology/impact_assessment_guidelines.pdf)

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*

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- 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 Assessment Certificate #M19-01.*
- CEA Agency. 2015. Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing. Government of Canada.
- CEA Agency. 2019. *Decision Statement Issued under Section 54 of the Canadian Environmental Assessment Act, 2012 to New Gold Inc. c/o Ryan Todd, Director, Blackwater Project Sunlife Plaza Suite 610, 1100 Melville Street Vancouver, British Columbia V6E 4A6 for the Blackwater Gold Project.*
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- DMCS and Skin Tyee First Nation. 2015. *Skin Tyee First Nation Traditional Land Use Study for New Gold Inc's Proposed Blackwater Project.* Prepared for New Gold Inc.
- DMCS and Ulkatcho First Nation. 2013. *Ulkatcho First Nation Traditional Land Use and Ecological Knowledge of the proposed New Gold Inc. Blackwater Project Final Report (Public).* Prepared for New Gold Inc.
- EMLI. 2021. *Health, Safety and Reclamation Code for Mines in British Columbia.*
- ERM. 2016. *Blackwater Gold Project: Further Assessment of Potential Effects on Current Aboriginal Use.* Prepared for New Gold Inc. by ERM Consultants Canada Ltd.: Vancouver, BC.
- Furniss, E. 2004. The Carrier Indian and the Politics of History. In E.R. Wilson, *Native Peoples: The Canadian Experience.* Toronto: Oxford University Press, 198–222.
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APPENDIX A CONCORDANCE WITH ENVIRONMENTAL ASSESSMENT CERTIFICATE #M19-01 (JUNE 21, 2019)

Table A-1: Environmental Assessment Certificate #M19-01 Conditions and Location in the Cultural and Spiritual Resources Management Plan

Condition #	Requirement	Location in Plan
2 (Plan Development)	Where a condition of this Certificate requires the Holder to develop a plan, program or other document, any such plan, program or other document must, at a minimum, include the following information: a) purpose and objectives of the plan, program or other document;	Section 2
	b) roles and responsibilities of the Holder and Employees;	Section 3, Table 3-1
	c) names and, if applicable, professional certifications and professional stamps/seals, of those responsible for the preparation of the plan, program, or other document;	Section 13
	d) schedule for implementing the plan, program or other document throughout the relevant Project phases;	Section 10.4
	e) means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness;	Section 10
	g) schedules and methods for the submission of reporting to specific agencies, Aboriginal Groups and the public and the required form and content of those reports; and process and timing for updating and revising the plan, program or other document, including any consultation with agencies and Aboriginal Groups that would occur in connection with such updates and revisions.	Section 11
3 (Adaptive Management)	Where a condition of this Certificate requires the Holder to develop a plan, program or other document that includes monitoring, including monitoring of mitigation measures or monitoring to determine the effectiveness of the mitigation measures, the Holder must include adaptive management in that plan. The objective of the adaptive management is to address the circumstances that will require the Holder to implement alternate or additional mitigation measures to address effects of the Project if the monitoring shows that those effects: a) are not mitigated to the extent contemplated in the Application; b) are not predicted in the Application; or c) have exceeded the triggers identified in paragraph g) of this condition.	Sections 5, 13
	The adaptive management in the plan must include at least the following: d) the monitoring program that will be used including methods, location, frequency, timing and duration of the monitoring;	Sections 11.1.1 and 11.1.2
	e) the baseline information that will be used, or collected where existing baseline information is insufficient, to support the monitoring program;	Section 8 and 9
	f) the scope, content and frequency of reporting of the monitoring results;	Section 12
	g) the identification of qualitative and quantitative triggers, which, when observed through monitoring required under paragraph d), will require the Holder to alter existing, or develop new, mitigation measures to avoid, reduce, and/or remediate effects;	Section 13
	h) the methods that will be applied to detect when a numeric trigger, or type or level of change referred to in paragraph g), has occurred;	Section 13
	i) a description of the process for and timing to alter existing mitigation measures or develop new mitigation measures to reduce or avoid effects;	Section 13

Condition #	Requirement	Location in Plan
	j) identification of the new and/or altered mitigation measures that will be applied when any of the changes identified in paragraphs a) to c) occur, or the process by which those will be established and updated over the relevant timeframe for the specific condition;	Section 13
	k) the monitoring program that will be used to determine if the altered or new mitigation measures and/or remediation activities are effectively mitigating or remediating the effects and or avoiding potential effects; and	Section 13
	l) the scope, content and frequency of reporting on the implementation of altered or new mitigation measures.	Section 12 and 13
	If there are any requirements or mitigation measures required in the plan, program or other document for which adaptive management, or elements of adaptive management listed in paragraphs d) to l) are assessed to be not appropriate or applicable, the plan must include identification of those requirements and measures, and the rationale for that assessment.	Noted
4 (Consultation)	<p>Where a condition of this Certificate requires the Holder consult a particular party or parties regarding the content of a plan, program or other document, the Holder must, to the satisfaction of the EAO:</p> <p>a) provide written notice to each such party that:</p> <ul style="list-style-type: none"> i) includes a copy of the plan, program or other document; ii) invites the party to provide its views on the content of such plan, program or other document; and iii) indicates: i. if a timeframe for providing such views to the Holder is specified in the relevant condition of this Certificate, that the party may provide such views to the Holder within such time frame; or ii. if a timeframe for providing such views to the Holder is not specified in the relevant condition of this Certificate, specifies a reasonable period during which the party may submit such views to the Holder; <p>b) undertake a full and impartial consideration of any views and other information provided by a party in accordance with the timelines specified in a notice given pursuant to paragraph (a);</p> <p>c) provide a written explanation to each such party that provided comments in accordance with a notice given pursuant to paragraph (a) as to: i) how the views and information provided by such party to the Holder have been considered and addressed in a revised version of the plan, program or other document; or ii) why such views and information have not been addressed in a revised version of the plan, program or other document;</p> <p>d) maintain a record of consultation with each such party regarding the plan, program or other document; and</p> <p>e) provide a copy of such consultation record to the EAO, the relevant party, or both, promptly upon the written request of the EAO or such party. The copy of such consultation record must be provided to the EAO, relevant party, or both, no later than 15 days after the Holder receives the request for a copy of the consultation record, unless otherwise authorized by the EAO.</p>	Drafts of the CSMP were provided to Indigenous groups for review and comment, taking into account the requirements in Condition 4.

Condition #	Requirement	Location in Plan
18 (Cultural and Spiritual Resources Management Plan)	The Holder must retain a Qualified Person to develop a Cultural and Spiritual Resources Management Plan for the Construction, Operations and Closure phases. The plan must be developed in consultation with Aboriginal Groups, EMPR, ENV and FLNRORD. The plan must include at least the following: a) the types of historic, cultural and spiritual resources that will be addressed by the plan, including resources that are of cultural or spiritual significance to the Aboriginal Groups who may have cultural and/or spiritual resources in the Project Area;	Section 2.1 and 7
	b) the process by which a Qualified Person is selected;	Section 2.1
	c) how the Holder will consult and work with Aboriginal Groups to identify areas of cultural or spiritual importance that may be affected by the Project, and to determine whether the areas can be protected from impacts, or whether relocation of features of importance or activities under Condition 15 (Indigenous Cultural Awareness and Recognition) are needed to address effects;	Section 9
	d) chance find procedure that must include: i) mitigation measures to avoid or reduce adverse effects to chance finds; ii) training for Employees; iii) means and protocols for notifying Aboriginal Groups of finds, including maintenance of up to date contact lists for Aboriginal Groups; iv) means and protocols for involving Aboriginal Groups in the assessment of finds; and v) the means by which the Holder will document and make available to the relevant authorities any information the Holder has received from Aboriginal Groups on handling and storage of finds in consideration of any laws, customs or protocols identified by the Aboriginal Groups;	Section 8.2, Appendix C
	e) the means by which the Holder will keep confidential any sensitive cultural, spiritual and/or site-specific information that the Aboriginal Groups have advised the Holder is considered confidential;	Section 8.3
	f) the means by which the Holder will document the consultation in paragraph (c) with Aboriginal Groups and identify and implement measures in a manner that does not reveal confidential information on sites identified in paragraph e);	Sections 8.3, 9
	g) the means by which representatives and/or traditional knowledge holders from Aboriginal Groups will be involved in the implementation of the plan; and	Sections 8.2, 10
	h) a procedure for providing written reports to Aboriginal Groups on the implementation of this plan, including provision of a summary written in plain language.	Section 11
	The Holder must provide the draft plan that was developed in consultation with EMPR, FLNRORD, ENV and Aboriginal Groups to EMPR, FLNRORD, ENV, Aboriginal Groups and the EAO for review a minimum of 90 days prior to the planned commencement of Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.	Submitted by December 31, 2021
	The Holder must not commence Construction until the plan has been approved by the EAO, unless otherwise authorized by the EAO.	Noted

APPENDIX B CONCORDANCE WITH FEDERAL DECISION STATEMENT (APRIL 15, 2019)

Table B-1: Federal Environmental Assessment Decision Statement Conditions and Location in the Cultural and Spiritual Resources Management Plan

Condition	Requirement	Location in Plan
2.3 (General Conditions)	<p>The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:</p> <p>2.3.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;</p> <p>2.3.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time agreed upon with the party or parties being consulted, not less than 15 days, to prepare their views and information;</p> <p>2.3.3 undertake a full and impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation;</p> <p>2.3.4 strive to reach consensus with Indigenous groups; and</p> <p>2.3.5 advise the party or parties being consulted on how the views and information received have been considered by the Proponent including a rationale for why the views have, or have not, been integrated. The Proponent shall advise the party or parties in a time period that does not exceed the period of time taken in 2.3.2.</p>	Drafts of the CSMP were provided to Indigenous groups for review and comment, taking into account the requirements in Condition 2.3 and 2.4.
2.4 (Consultation)	<p>The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, determine and strive to reach consensus with each Indigenous group regarding the manner by which to satisfy the consultation requirements referred to in condition 2.3, including:</p> <p>2.4.1 the methods of notification;</p> <p>2.4.2 the type of information and the period of time to be provided when seeking input;</p> <p>2.4.3 the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation; and</p> <p>2.4.4 the period of time and the means by which to advise Indigenous groups of how their views and information were considered by the Proponent.</p>	Drafts of the CSMP were provided to Indigenous groups for review and comment, taking into account the requirements in Condition 2.3 and 2.4.
2.11 (Annual Reporting)	<p>The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:</p> <p>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;</p> <p>2.11.2 how the Proponent complied with condition 2.1;</p> <p>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;</p> <p>2.11.4 the information referred to in conditions 2.5 and 2.6 for each follow-up program;</p> <p>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;</p> <p>2.11.4 any update made to any follow-up program in the reporting year;</p>	Section 11.1.1

Condition	Requirement	Location in Plan
	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 2.11.8 any change(s) to the Designated Project in the reporting year.	
2.12 (Annual Reporting)	The Proponent shall provide a draft annual report referred to in condition 2.11 to Indigenous groups, no later than June 30 following the reporting year to which the annual report applies. The Proponent shall consult Indigenous groups on the content and findings in the draft annual report.	Section 11.1.1
2.13 (Annual Reporting)	The Proponent, in consideration of any comments received from Indigenous groups pursuant to condition, 2.12 shall revise and submit to the Agency and Indigenous groups a final annual report, including an executive summary in both official languages, no later than September 30 following the reporting year to which the annual report applies.	Section 11.1.1
2.15 (Information Sharing)	When the development of any plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency and to Indigenous groups prior to construction, unless otherwise required through the condition.	Section 11.1.1
7.1	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, and implement an archaeological impact assessment of the footprints of the final transmission line alignment and associated poles, roads and towers to help inform final placement of these features. The Proponent shall take into account British Columbia's Archaeological Impact Assessment Guidelines when developing and implementing the archaeological impact assessment. The Proponent shall apply the archaeological and heritage management plan pursuant to condition 7.2 to structures, sites, or things of historical, archaeological, paleontological, or architectural significance or physical or cultural heritage resources discovered within the footprint of the final transmission line alignment.	Section 10.1
7.2	The Proponent shall have a Qualified Professional develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during construction, operation and decommissioning, an archaeological and heritage management plan for any structures, sites, or things of historical, archaeological, paleontological, or architectural significance or physical or cultural heritage resources within the Designated Project area. The archaeological resources and heritage management plan shall include: 7.2.1 protocols to respect the discovery, handling, recognition, recording, transferring and safekeeping of structures, sites or things of historical, archaeological, paleontological or architectural significance;	Sections 8.2 and 11.1.3
	7.2.2 procedures to record, analyze, and mitigate the effects on cultural heritage resources and historic heritage sites, cultural sites previously identified through the heritage effects assessments conducted by the Proponent during the environmental assessment and, if applicable, the archaeological impact assessment completed for the final transmission line alignment;	Sections 8, 9.1, 11
	7.2.3 a process for reporting information about physical and cultural heritage features and structures, sites or things of historical, archaeological, paleontological or architectural significance to Indigenous groups;	Section 11

Condition	Requirement	Location in Plan
	7.2.4 a process for informing workers of sensitive cultural areas; and	Section 6
	7.2.5 a chance find procedure to apply in the event that previously unidentified physical or cultural heritage features or structures, sites or things of historical, archaeological, paleontological or architectural significance are discovered by the Proponent. As part of the chance find procedure the Proponent shall:	Section 8.2, Appendix C
	7.2.5.1 immediately halt work at the location of the discovery, except work required to be undertaken to protect the integrity of the discovery;	Appendix C
	7.2.5.2 delineate an area of at least 30 metres around the discovery as a no-work zone;	Appendix C
	7.2.5.3 conduct an assessment at the location of the discovery taking into account British Columbia's Archaeological Impact Assessment Guidelines;	Appendix C
	7.2.5.4 inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor any work related to this discovery; and	Appendix C
	7.2.5.5 consult with Indigenous groups and relevant authorities on the manner by which to comply with all applicable legal requirements and associated regulations, customs and protocols respecting the discovery, handling, recognition, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance; and	Section 8.2, Appendix C
	7.2.5.6 consult Indigenous groups on the manner by which to protect the confidentiality of the discovery. The Proponent shall protect the confidentiality of the discovery in a manner that is consistent with provincial laws.	Sections 8.2, 8.3, Appendix C
7.3	The Proponent shall provide access, during all phases of the Designated Project and within 24 hours of an access request being received, to Indigenous groups to the mine site for cultural purposes or for exercising Aboriginal rights, to the extent that such access and exercise of rights are safe. The Proponent shall notify Indigenous groups in a timely manner if access to the mine site, or any part thereof, must be prohibited for safety reasons.	Section 10.3

APPENDIX C ARCHAEOLOGICAL AND CULTURAL HERITAGE CHANCE FIND PROCEDURE



Blackwater Gold Project: Archaeological and Cultural Heritage Chance Find Procedure

APPLICATION

This procedure applies to previously unidentified physical or cultural heritage features or structures, sites, or things of historical, archaeological, paleontological, or architectural significance and provides mitigation measure to avoid or reduce adverse effects.

PROCEDURE

All those responsible for the management, implementation, and operation of any aspect of this procedure will be adequately trained for their role.

Employees and contractors will receive information related to heritage resources previously identified on site as well as cross-cultural training on the history of local Indigenous nations and training on the Chance Find Procedure on their arrival on site through an environmental on-boarding training session and prior to the start of work as part of the Site Orientation. The purpose of this training is to provide site personnel with a basic level of awareness related to heritage, spiritual and archaeological resources and an understanding of their obligations regarding compliance with plan, regulatory requirements, commitments and best practices.

Site supervisors will be provided with a copy of the CSMP and will receive additional training with respect to the Chance Find Procedure.

BW Gold will regularly review and update the training and awareness related to the plan based on changes in training needs and regulatory requirements.

Prior to the commencement of Project work, all workers will:

1. Have received training on the use of this procedure;
2. Have been provided information on typical identifiers for archaeological and cultural use sites;
3. Have reviewed and be aware of the requirements of this procedure;
4. Have reviewed and understood information pertaining to Chance Find Procedures appropriate for the work activity being undertaken.

If in the course of your work you discover what you suspect may be a possible archaeological, historic, cultural, spiritual and/or paleontological site, the following procedures apply:

Upon Discovery

1. Immediately halt work at the location of the discovery, except work required to be undertaken to protect the integrity of the discovery.
2. Delineate an area of at least 50 metres around the discovery as a 'no work' zone.
3. Note the location (GPS coordinates) and take photographs.
4. Inform your supervisory, Environmental Manager (EM) or Mine Manager immediately.
5. Prepare an initial Chance Find Form (attached).

Post-Discovery

- Within 24 hours of the discovery, the EM contacts the Project archaeologist and informs Indigenous groups and the Impact Assessment Agency (Table 1 provides key contact information).
- The EM invites Indigenous groups to monitor any work related to the discovery.
- The Project archaeologist conducts an assessment at the location of the discovery subject to BC's Archaeological Impact Assessment Guidelines and protocols that are in place with Indigenous groups respecting the discovery, handling, recognition, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance and the confidentiality of a discovery.
 - If the discovery is an archaeological site, the Project archaeologist contacts the BC Archaeology Branch. The Project archaeologist, in consultation with the Archaeology Branch, conducts an investigation, and provides updates to the Archaeology Branch and Indigenous groups on the progress of the investigation. The Project Archaeologist works with the EM and Indigenous groups to prepare Site Report, which includes instruction to recommence work in the area. The Site Report is submitted to the EM, Indigenous groups and the Archaeology Branch.
 - If the discovery is a historic site, the Project archaeologist contacts Indigenous groups and local communities to determine site significance.
 - If the discovery is a cultural or spiritual site, the Project archaeologist contacts Indigenous groups to determine site significance.
 - If the discovery is a paleontological site, the Project archaeologist contacts BC's Fossil Management Office.
- Subject to protocols with Indigenous groups, any material discovered on the Project site is stored in a secure location with limited access as follows:
 - If the material is archaeological, the artifact is held by the Project archaeologist until the *Heritage Conservation Act* (HCA) Section 12 permit has expired and the artifact(s) is submitted to the repository designated in the permit.
 - If the material is historical, the repository is determined in consultation with Indigenous nations and local communities.
 - If the material is cultural and/or spiritual, the repository is determined by Indigenous nations.
 - If the material is paleontological, the repository is determined by the Fossil Management Office.
- The handling and storage of material, apart from material outlined in the HCA Section 12 permit, is determined in consultation with Indigenous Nations.

Suspected Human Remains Discovery

If in the course of your work you discover what you suspect may be human remains, the following procedures apply:

- Immediately halt work in the area of the discovery.
- Do not disturb or move the possible human remains.
- Note the location (GPS coordinates) and take photographs.
- Report your discovery to your supervisor, EM or Mine Manager.
- If you are unable to contact a BW Gold representative, and the suspected human remains appear to be current, contact the Vanderhoof RCMP.

The following steps will generally be followed.

- The Coroners Service (Northern Region) in Prince George and Vanderhoof RCMP will be notified and the Coroners Service will determine whether the matter is of contemporary forensic concern.
- If the remains are not of forensic concern, the Archaeology Branch will attempt to facilitate disposition of the remains.
- If a cultural affiliation for the remains can be determined, the Archaeology Branch will contact an organization representing that cultural group. If the remains are of Indigenous ancestry, the Branch will contact the relevant Indigenous communities.
- If remains are buried and under no immediate threat of further disturbance, they will not be excavated or removed. If the remains are partially buried or uncovered, the Archaeology Branch will facilitate disposition.

Table 1: Key Contacts

Name	Email	Phone Number
Archaeology Branch	Archaeology@gov.bc.ca	1 (250) 953-3334
Blackwater Gold	office.blackwater@artemisgoldinc.com	1 (250) 567-3276
Fossil Management Office	Fossil.Management@gov.bc.ca	1 (250) 356-7506
Ulkatcho First Nation	chief@ulkatcho.ca	1 (250) 742-3260
Lhoosk'uz Dené Nation	admin@lhooskuz.com	1 (250) 992-3290
Nadleh Whut'en First Nation	TBC	1 (250) 690-7211
Stellat'en First Nation	TBC	1 (250) 699-8747
Saik'uz First Nation	TBC	1 (250) 567-9293
Nazko First Nation	TBC	1 (250) 992-7982
Skin Tyee Nation	TBC	1 (250) 694-3517
Tsilhqot'in Nation	TBC	1 (778) 799-2145 or (250) 392-3918
Métis Nation British Columbia	Communications@mnbc.ca	1 (604) 557-5851
Nee-Tahi-Buhn Band	TBC	1 (250) 694-3494
Impact Assessment Agency	iaac.vancouver.aeic@canada.ca	1 (604) 666-2431
BC Coroners Service Northern Region (Prince George)	N/A	1 (888) 991-2111 (toll free) 1 (250) 861 7429
Vanderhoof RCMP	N/A	1 (250) 567-2222
Prince George RCMP	N/A	1 (250) 562-3300

Cultural Heritage Chance Find Report Form

Recorder's Name/Affiliation: _____

Date: _____

Location of chance find (Location description,
UTM coordinates, development, depth below surface): _____

Description of find: _____

Method used to mark and protect find: _____

Distribution:

☐
BW Gold

☐
Site Archaeologist

☐
Indigenous
Nations

☐
Archaeology
Branch

☐
Fossil
Management
Office

Sketch Map

Photo

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