



Blackwater Gold Project

Document Submission Plan

November 2022

Project No.: 0635833

Version 7.0

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Document Submission Plan

Version 7.0

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DOCUMENT HISTORY

February 2021 (Version 1.0)

August 2021 Update (Version 2.0)

October 2021 Update (Version 3.0)

March 2022 Update (Version 4.0)

June 2022 Update (Version 5.0)

November 2022 Update (Version 6.0, Version 7.0)

Section	Summary of Change
Version 7.0	
Table 5-1 and Figure 5-1	Updated timelines

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1. BACKGROUND, PURPOSE, AND OBJECTIVES

On June 21, 2019, New Gold Inc. received Environmental Assessment Certificate (EAC) #M19-01 for the Blackwater Gold Project (the Project), a new open pit gold and silver mine with associated ore processing facilities located 110 kilometres southwest of Vanderhoof in central British Columbia (BC).

In August 2020, Artemis Gold Inc. (Artemis) acquired the mineral tenures, assets and rights in the Project that were previously held by New Gold Inc. On August 7, 2020, the EAC was transferred to BW Gold LTD. (BW Gold) under the 2018 *Environmental Assessment Act*.

Condition 10 of the EAC requires the holder of the EAC [BW Gold] to develop a Document Submission Plan (DSP) identifying the proposed timelines for submission of the documents required by the EAC, in consultation with the BC Ministry of Energy, Mines and Low Carbon Innovation (EMLI); BC Ministry of Environment and Climate Change Strategy (ENV); BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD); Northern Health Authority (NHA); Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Stelat'en First Nation, Saik'uz First Nation, and Nazko First Nation (Indigenous Groups); District of Vanderhoof; and Village of Fraser Lake.

BW Gold submitted a DSP (Version 1.0) to the Environmental Assessment Office (EAO) on February 9, 2021. The EAO approved the DSP by way of a letter sent to BW Gold on April 12, 2021. The EAO's letter identified that some parties raised concerns about the timing of documents and the potential work burden if multiple management plans are received at the same time. Version 2.0 of the DSP was prepared to make efforts to alleviate the pressure of receiving multiple plans at once, to avoid duplicative reviews by further aligning plans required by the EAC with plans required by other regulatory processes, and to correct some inconsistencies and errors in Version 1.0 of the plan.

Version 3.0 was provided to the EAO on November 12, 2021. It was prepared to correct a few discrepancies regarding the plans related to Transmission Line construction, to address a typo regarding the submission date of the Wetland Offsetting and Management Plan, to include the Closure and Post-closure Water Quality Management Plan (Condition 34), and to adjust the timing of the submission of the plans that overlap with the Joint *Mines Act/Environmental Management Act* (MA/EMA) permit application.

Since October 2021, BW Gold has submitted all pre-construction plans to the EAO, and the EAO has provided direction on which plans can proceed to be implemented and which plans require revision and resubmission prior to commencement of construction (see letters of January 28, 2022, February 18, 2022, April 19, 2022, August 31 and September 22, 2022). In these letters, the EAO directed that the DSP must be updated and resubmitted prior to commencement of construction. Version 7.0 of the DSP has been prepared to meet fulfill the EAO's requirement: a discussion about plan status and submission timing has been added and Table 5-1 and Figure 5-1 have been updated; a discussion regarding the linkages between EAC plans and plans required by the federal Decision Statement has been added; and a few minor typos have been corrected.

2. COMPLIANCE OBLIGATIONS

Specific requirements for the Document Submission Plan under Condition 10 of the EAC are reproduced below.

The Holder [i.e., BW Gold] must develop a plan for approval by the EAO identifying proposed dates or timelines for submission of every plan, program or other document required by this Certificate and for submissions made under Condition 26 (Water Quality Management). [...] The Document Submission Plan must demonstrate how the proposed dates or timelines align with any similar requirements in other provincial processes.

The Document Submission Plan does not apply to Condition 14 (Existing Disturbance), Condition 19 (the Environmental Monitoring Committee [EMC]), Condition 34 (Closure and Post Closure Water Quality Management Plan), and Condition 43 (Mitigations Table Update).

The Document Submission Plan, and any amendments or updates thereto, will become the dates or timelines required for submission of plans, programs or other documents required by this Certificate once the plan is approved by the EAO, and thereby replacing the submission timelines set out in the applicable conditions.

In addition, Condition 2 of the EAC requires that all required plans, programs, or other documents must, at a minimum, include the following information:

- a. *purpose and objectives of the plan, program, or other document;*
- b. *roles and responsibilities of the Holder and Employees;*
- c. *names and, if applicable, professional certifications and professional stamps/seals, of those responsible for the preparation of the plan, program, or other document;*
- d. *schedule for implementing the plan, program, or other document throughout the relevant Project phases;*
- e. *means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness; [not applicable to this Plan]*
- f. *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*
- g. *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.*

3. RESPONSIBILITY FOR PLAN PREPARATION

This plan has been prepared by ERM Consultants Canada Ltd. for Ryan Todd, VP Environment and Social Responsibility, Artemis Gold.

4. ALIGNMENT WITH OTHER REGULATORY PROCESSES

Many of the plans required in the DSP align with similar requirements in other regulatory processes, in particular, plans that are required by the federal Environmental Assessment Decision Statement (DS; CEAA 2019) under the *Canadian Environmental Assessment Act, 2012* (S.C. 2012, c. 19, s. 52) and the Joint Application Information Requirements for *Mines Act* and *Environmental Management Act* Permits (EMPR & ENV 2019). Table 4-1 identifies those plans required by the EAC that include similar information requirements. For each of these plans, BW Gold has developed one plan that would be submitted to Impact Assessment Agency of Canada (IAAC) and/or with the MA/EMA permits application and also provided to the EAO. Concordance tables have been included in each plan document to indicate where the requirements for each process have been addressed.

Table 4-1: Regulatory Processes with Similar Requirements

EAC Condition	Document Name	Federal DS Requirement	MA/EMA Requirement
13	Construction Environmental Management Plan (CEMP)	N/A	Section 9.4 of the MA/EMA Guidance requires a CEMP.
18	Cultural and Spiritual Resources Management Plan (CSRMP)	The CSRMP incorporates the requirements of DS 7.1-7.3.	N/A
20	Air Quality and Dust Management Plan (AQDMP)	The AQDMP incorporates the requirements of DS 6.1, 6.12, and 6.15.	An Air Quality and Dust Management Plan is required by ENV to support the air discharge authorization. This plan addresses the requirements in “Developing a Fugitive Dust Management Plan for Industrial Projects” (EMPR & ENV 2018) and EAC condition.
21	Noise and Vibration Effects Monitoring and Mitigation Plan (NVMP)	The NVMP incorporates the requirements of DS 6.3 and 6.4.	N/A
22	Caribou Mitigation and Monitoring Plan (CMMP)	The CMMP incorporates the requirements of DS 8.9.and 8.18.	N/A
23	Wildlife Management and Monitoring Plan (WMMP)	The WMMP incorporates the requirements of DS 4.1-4.5, 6.2, 6.10, 6.14, 6.15, 8.1-8.17, 8.21, and 8.22.	Section 9.10 of the MA/EMA Guidance requires a Wildlife Management Plan to minimize wildlife impacts in the Project area.
24	Wetland Management and Offsetting Plan (WMOP)	The WMOP incorporates the requirements of DS 5.1-5.5.	N/A
25	End Land Use Plan	N/A	Section 4 of the MA/EMA Guidance requires a Reclamation and Closure Plan, which includes a life of mine reclamation plan for the closure or abandonment of the mine, consistent with Section 10 of the Health, Safety and Reclamation Code for Mines in BC.

EAC Condition	Document Name	Federal DS Requirement	MA/EMA Requirement
26	Water Quality Management Science-based Environmental Benchmarks Report	N/A	BW Gold has requested a science-based environmental benchmark for dissolved aluminum due to elevated background levels as part of the MA/EMA permits application (Chapter 5, Appendix 5-E and Chapter 7, Appendix 7-A).
27	Water Quality Report	N/A	A cumulative baseline water quality report was submitted as part of the MA/EMA permits application. BW Gold has addressed the EAC condition requirements in this report, which will also inform plans required by MA/EMA Guidance (e.g., Mine Site and Discharge Water Management and Monitoring Plan).
28	Chedakuz Creek and Tatelkuz Lake Surface Water Quality Monitoring Plan	Chedakuz Creek and Tatelkuz Lake Surface Water Quality Monitoring Plan incorporates requirements of DS 3.16.	N/A
30	Aquatic Effects Monitoring Plan (AEMP)	The AEMP incorporates the requirements of DS 3.15.	Section 7.6 of the MA/EMA Guidance requires an AEMP).
32	Cyanide Management Plan (CMP)	N/A	Section 9.16 of the MA/EMA Guidance requires a Chemical and Materials Storage, Transfer and Handling Management Plan, which considers waste management options. BW Gold has included the EAC requirement for the CMP as an appendix to the Chemical and Materials Storage, Transfer and Handling Management Plan.
36	Accidents and Malfunctions Administration and Communication Plan	The Accidents and Malfunctions Administration and Communication Plan incorporates the requirements of DS 10.1-10.5.	N/A
39	Final Transmission Line Routing Plan (FTLRP; Phase 1 draft for EAO review)	The FTLRP Phase 1 incorporates the requirements of DS 6.9.	N/A
41	Country Foods Monitoring Plan (CFMP)	The CFMP incorporates the requirements of DS 6.3, 6.5, 6.11, 6.13, and 6.14.	N/A

5. PROPOSED TIMELINES AND METHODS FOR DOCUMENT SUBMISSION

The submission timelines of the documents required by the EAC and subject to Condition 10 are listed in Table 5-1 and represented as a Gantt chart in Figure 5-1. BW Gold has submitted the majority of the construction plans as required by the EAC and will continue to submit plans as the Project proceeds, according to the proposed timelines. Where the EAO has indicated that plans require revision, BW Gold has proposed a resubmission schedule. Documents will be delivered in Adobe Acrobat (PDF) format or MS Word for draft versions of the Plan via e-mail to the preferred representatives of each of the required recipients.

Table 5-1: Proposed Timelines for Document Submission

EAC Condition	Document Name	Required Recipients										EAC Timing Requirement	Submission Timeline	Status
		EMLI	ENV	FLNRORD	NHA	Indigenous Groups	EAO	ECCC	District of Vanderhoof	Village of Fraser Lake	Other			
10	DSP (draft for consultation)	X	X	X	X	X	-	-	X	X	-	45 days prior to providing draft plan to EAO for review and approval	Submission: February 9, 2021	Submission complete.
10	DSP (draft for EAO review and approval)	-	-	-	-	-	X	-	-	-	-	75 days prior to first submission deadline in DSP	V1.0: Approved April 12, 2021 V2.0: August 26, 2021 V3.0: Approved November 12, 2021 V4.0: Update March 2022 V5.0: Update June 2022 V6.0: Update November 7, 2022	Ongoing, V7.0 BW Gold working on update.
11	Care and Maintenance Plan	X	X	X	-	X	X	-	-	-	-	60 days prior to commencement of Construction	Submission: December 29, 2021 Resubmission: August 21, 2022 Planned Resubmission with Care and Maintenance modelling complete end of Major Works Application Review	Plan is currently being revised in response to EAO comments.
12	Name, organization, qualifications, and relevant experience of the proposed Independent Environmental Monitor and related terms of engagement	-	-	-	-	X	X	-	-	-	-	60 days prior to commencement of Construction ²	Submission: November 1, 2021 Resubmission: January 21, 2022 Resubmission: March 16, 2022 Resubmission: May 24, 2022	Submission complete approved by EAO in letter on August 31, 2022.
12	Independent Environmental Monitor's Detailed Project Phase Work Plan	-	-	-	-	X	X	-	-	-	BW Gold	No specific timing requirement in EAC condition	Prior to start of Construction, Operations, Closure, and Post-closure phases Submission: March 16, 2022 Resubmission: May 24, 2022	Submission complete, approved by EAO for implementation in letter on August 31, 2022.
12	Independent Environmental Monitor's Project Phase Completion Report	-	-	-	-	X	X	-	-	-	-	No specific timing requirement in EAC condition	Upon completion of each of the Construction, Operations, Closure, and Post-closure phases	To be initiated
13	Construction Environmental Management Plan	X	X	X	-	X	X	-	-	-	-	90 days prior to commencement of Construction ²	Submission: December 1, 2021 Resubmission: April 1, 2022 Resubmission: May 2022	Submission complete, approved by EAO for implementation in letter on August 31, 2022.
15	Indigenous Cultural Awareness and Recognition	-	-	-	-	X	-	-	-	-	-	90 days prior to commencement of Construction in an Aboriginal Group's asserted or established traditional territory ²	October 1, 2021	No approval by EAO required from this plan.
16	Aboriginal Group Engagement Plan	-	-	-	-	X	X	-	-	-	-	90 days prior to commencement of Construction ²	Submission: December 1, 2021 Resubmission: March 4, 2022	Submission complete, approved by EAO for implementation in a letter received on April 19, 2022.
17	Aboriginal Group Monitor and Monitoring Plan and related terms of engagement	-	-	-	-	X	X	-	-	-	-	60 days prior to commencement of Construction	Submission: December 29, 2021	Submission complete, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022.
18	Cultural and Spiritual Resources Management Plan	X	X	X	-	X	X	-	-	-	-	90 days prior to commencement of Construction ²	Submission: December 1, 2021 Resubmission: March 4, 2022	Submission complete, approved by EAO for implementation in a letter received on April 19, 2022.

EAC Condition	Document Name	Required Recipients										EAC Timing Requirement	Submission Timeline	Status
		EMLI	ENV	FLNRORD	NHA	Indigenous Groups	EAO	ECCC	District of Vanderhoof	Village of Fraser Lake	Other			
20	Air Quality and Dust Management Plan	X	X	-	X	X	X	-	-	-	-	60 days prior to commencement of Construction	Submission: December 29, 2021 Resubmission with Major Work's (MW) application: April 20, 2022 Potential Resubmission: Following MAEMA MRC Review	Submission complete, EAO advised that BW Gold December 2021 Version of the plan may proceed to implement the plan in letter from Feb 18, 2022.
21	Noise and Vibration Effects Monitoring and Mitigation Plan	X	X	-	X	X	X	-	-	-	-	60 days prior to commencement start of Construction	Submission: December 29, 2021 Potential Resubmission: Q3 2022	Submission complete, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022.
22	Caribou Mitigation and Monitoring Plan ¹	X	X	X	-	X	X	X	-	-	-	180 days prior to commencement of Construction ²	Submission: August 12, 2021 Resubmission: March 15, 2022	Submission complete, approved by EAO for implementation in a letter received from EAO on April 19, 2022. Approved by ECCC via an e-mail from Tasha Gallagher April 14, 2022.
23	Wildlife Management and Monitoring Plan	X	X	X	-	X	X	X	-	-	-	60 days prior to commencement start of Construction	Submission: December 30, 2021 Resubmission: April 4, 2022 Resubmission with MW's application: April 20, 2022 Potential Resubmission: July, 2022	Submission complete, approved by EAO for implementation in August 31 letter.
24	Wetland Management and Offsetting Plan	X	X	X	-	X	X	X	-	-	-	90 days prior to commencement start of Construction ²	Submission: December 1, 2021 Resubmission: March 16, 2022 Future Submission Q4 2022	Submission complete, Interim plan cleared for implementation by EAO September 22, 2022, plan not yet fully approved.
25	End Land Use Plan	X	X	X	-	X	X	-	-	-	-	60 days prior to commencement start of Construction	Submission: December 20, 2021 Resubmission with MW's application as Chapter 4: April 20, 2022 Resubmission to Nations: July 1, 2022 Resubmission with the EAO: July 1, 2022	Plan is being revised in response to EAO comments.
26	Water Quality Management Science-Based Environmental Benchmarks	-	X	-	-	X	X	-	-	-	-	Required only if the Project would cause downstream water quality to exceed BC Water Quality Guidelines. No specific timing requirement in EAC condition	Submission: December 20, 2021	Submission complete, EAO advised that BW Gold may proceed to implement the plan in a letter from Feb 18, 2022.
26	Report on how Yinka Dené Water Law or other Aboriginal water policies made available to New Gold [BW Gold] for Davidson Ck or Creek 661 were considered in the development of science-based Environmental Benchmarks	X	X	-	-	X	X	-	-	-	-	No specific timing requirement in EAC condition	Submission: December 20, 2021 Resubmission with MW's application: April 20, 2022 Potential Resubmission: Following MAEMA MRC Review	Submission complete, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022.
27	Water Quality Report	-	X	-	-	X	X	-	-	-	-	No specific timing requirement in EAC condition	Submission: January 21, 2022 Resubmission with MW's application: April 20, 2022 Potential Resubmission: Following MAEMA MRC Review	Submission complete, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022.

EAC Condition	Document Name	Required Recipients										EAC Timing Requirement	Submission Timeline	Status
		EMLI	ENV	FLNRD	NHA	Indigenous Groups	EAO	ECCC	District of Vanderhoof	Village of Fraser Lake	Other			
28	Chedakuz Creek and Tatelkuz Lake Surface Water Quality Monitoring Plan	X	X	-	-	X	X	-	-	-	-	60 days prior to commencement start of Construction	Submission: December 20, 2021 Resubmission with MW's application: April 20, 2022 Potential Resubmission: Following MAEMA MRC Review	Submission complete, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022.
29	Transmission Line Sedimentation Monitoring Plan	-	X	X	-	X	X	-	-	-	-	90 days prior to commencement of transmission line construction ²	Submission: June 2022 Planned submission to EAO	Submission for consultation with Indigenous nations and Province of BC complete. BW Gold in process of responding to comments on the plan.
30	Aquatic Effects Monitoring Plan	X	X	X	-	X	X	-	-	-	-	60 days prior to commencement start of Construction	Submission: December 20, 2021 Resubmission with MW's application: April 20, 2022 Potential Resubmission: Following MAEMA MRC Review	Submission complete, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022.
31	Tatelkuz Lake Protection Plan	X	X	X	-	X	X	-	-	-	-	60 days prior to commencement start of Construction	90 days prior to pumping water from Tatelkuz Lake ²	To be initiated
32	Cyanide Management Plan	X	X	-	-	X	X	-	-	-	-	60 days prior to commencement start of Construction	Submission: December 23, 2021 Resubmission with MW's application: April 20, 2022 Potential Resubmission: Following MAEMA MRC Review	Submission complete, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022
33	Mine Waste and Water Management Plan	X	X	-	-	X	X	-	-	-	-	60 days prior to commencement of Construction and thereafter updated at least every five years	Draft Plan Submission: April 28 Final Plan: No later than 6 months after the finalization of the MRC major Works process and issuance of MA and EMA Permits	Submission to Indigenous nations complete, plan has been submitted to EAO for review and approval.
34	Closure and Post-closure Water Quality Management Plan	X	X	-	-	X	X	-	-	-	-	At the time of the Holder's planned commencement of Operations	At the time of the Holder's planned commencement of Operations – Current Target 2024	To be initiated
35	Tailings Dam Safety Transparency Plan	X	X	-	-	X	X	-	-	-	-	60 days prior to commencement of Construction	90 days prior to the start of placing tailings or waste rock under water cover within the tailings storage facility ^{1,2}	To be initiated
36	Accidents and Malfunctions Administration and Communication Plan	X	X	X	X	X	X	-	-	-	-	60 days prior to commencement of Construction	Submission: December 29, 2021 Potential Resubmission: Q3 2022	Submission complete, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022.
37	Community Liaison Committee Terms of Reference	-	-	-	-	-	X	-	-	-	Committee members	180 days prior to planned commencement of Construction	Submission: June 2021	Submission complete.
37	Community Effects Monitoring and Management Plan	-	-	-	-	-	X	-	-	-	Committee members	60 days prior to planned commencement of Construction	Submission: December 30, 2021 Resubmission: March 2022	Submission complete, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022.
38	Tenure Holder Communication and Mitigation Plan (draft)	-	-	X	-	-	X	-	-	-	-	90 days prior to commencement of Construction ²	Submission: December 1, 2021 Resubmission: March 4, 2022	Submission complete, EAO advised to resubmit to the EAO within 60 days following the start of Construction in letter on April 19, 2022.

EAC Condition	Document Name	Required Recipients										EAC Timing Requirement	Submission Timeline	Status
		EMLI	ENV	FLNRORD	NHA	Indigenous Groups	EAO	ECCC	District of Vanderhoof	Village of Fraser Lake	Other			
39	Final Transmission Line Routing Plan (Phase 1)		X	X	-	X	X	-	-	-	-	1 year prior to commencement of Construction ²	Submission: February 17, 2021 Resubmission: March 2022	Submission complete, approval by EAO in letter on April 19, 2022.
39	Final Transmission Line Routing Plan (Phase 2)	-	X	X	-	X	X	-	-	-	-	60 days prior to commencement of transmission line construction ²	Planned Submission to Nations: Planned Submission to EAO: 60 days prior to TL construction	Submission for consultation with Indigenous nations and Province of BC complete.
40	Health and Medical Services Plan	-	-	-	X	X	X	-	X	X	-	60 days prior to planned commencement of Construction	Submission: December 21, 2021 Resubmission: April 14, 2022	Submission complete, approved by EAO for implementation in August 31 letter.
41	Country Foods Monitoring Plan	X	X	-	X	X	X	-	-	-	-	60 days prior to planned Commencement of Construction	Submission: December 20, 2021 Potential Future Submission: Q4 2022	Ongoing, EAO advised that BW Gold may proceed to implement the plan in letter from Feb 18, 2022, however BW Gold is adding a small mammal baseline sampling program to the plan and will resubmit this plan November or December 2022.
43	Master Mitigations Table	X	X	X		X	X				-	Approval by EAO prior to the commencement of construction	Submission: March 18, 2022 Resubmission with mapping exercise complete: July 20/August 30	Submission complete, approved by EAO for implementation in August 31 letter.

¹ Document must be approved by EAO prior to commencement of Construction, unless otherwise authorized by EAO.

² Timelines are indicative and may be updated in later iterations of DSP subject to permitting and project development schedule.

Figure 5-1: Document Submission Gantt Chart

EAC Condition	Document Name	Timing as Outlined in EAC or Revised through EAO Direction	Management Plan Version	EAO Letter Approval Date	Upcoming Submissions														2024	Operations Phase
					2022			2023												
					Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov		
Plans Approved																				
10	Document Submission Plan to Indigenous Groups and local governments	30 days prior to providing draft Plan to EAO	February 2021	NA																
10	Document Submission Plan to EAO	At same time Document Submission Plan submitted to EAO	J.1 June 2022 Version 5.0	Ongoing																
12	Independent Environmental Monitor Plan	60 days prior to Construction	A.5 May 2022	31-Aug-22																
12	IEM qualifications and terms of engagement submitted	60 days prior to Construction	A.5 May 2022	N/A																
12	IEM's Detailed Project Phase Work Plan	Prior to start of Construction phase	A.5 May 2022	N/A																
13	Construction Environmental Management Plan	Resubmit to the EAO for approval prior to the commencement of Construction.	E.1 May 2022	31-Aug-22																
16	Aboriginal Group Engagement Plan	Proceed to implement the draft plan and commence Construction prior to approval by the EAO. Resubmit to the EAO for approval.	E.1 March 2022	19-Apr-22																
17	Aboriginal Group Monitor and Monitoring Plan and terms of engagement	Proceed to implement and revise in consultation with the parties listed in Schedule B.	A.1 December 2022	18-Feb-22																
18	Cultural and Spiritual Resources Management Plan	Resubmit to the EAO for approval prior to the commencement of Construction.	F.1 March 2022	19-Apr-22																
19	Environmental Monitoring Committee established	180 days before Document Submission Plan submitted	25-Oct-21	5-Nov-21																
19	Environmental Monitoring Committee Terms of Reference	75 days prior to first submission deadline in Plan	25-Oct-21	5-Nov-21																
20	Air Quality and Dust Management Plan	Proceed to implement and revise in consultation with the parties listed in Schedule B.	C.1 December 2021	18-Feb-22																
21	Noise and Vibration Effects Monitoring and Mitigation Plan	Proceed to implement and revise in consultation with the parties listed in Schedule B.	D.1 December 2021	18-Feb-22																
22	Caribou Mitigation and Monitoring Plan	180 days prior to start of Construction	F.1 March 2022	19-Apr-22																
23	Wildlife Management and Monitoring Plan	Resubmit to the EAO for approval prior to the commencement of Construction.	H.1 July 2022	31-Aug-22																
24	Wetland Management and Offsetting Plan	Resubmit to the EAO for approval prior to the commencement of Construction.	D.1 March 2022	22-Sep-22																
26	Water Quality Management Plan	Proceed to implement and revise in consultation with the parties listed in Schedule B.	November 2021	18-Feb-22																
27	Water Quality Report	Proceed to implement and revise in consultation with the parties listed in Schedule B.	January 2022	18-Feb-22																

EAC Condition	Document Name	Timing as Outlined in EAC or Revised through EAO Direction	Management Plan Version	EAO Letter Approval Date	Upcoming Submissions															Operations Phase		
					2022			2023									2024					
					Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec		TBD	
28	Chedakuz Creek and Tatelkuz Lake Surface Water Quality Monitoring Plan	Proceed to implement and revise in consultation with the parties listed in Schedule B.	December 2021	18-Feb-22																		
30	Aquatic Effects Monitoring Plan	Proceed to implement and revise in consultation with the parties listed in Schedule B.	B.1 December 2021	18-Feb-22																		
32	Cyanide Management Plan	60 days prior to commencement start of Construction	B.1 December 2021	18-Feb-22																		
36	Accidents and Malfunctions Administration and Communication Plan	Proceed to implement and revise in consultation with the parties listed in Schedule B.	C.1 December 2021	18-Feb-22																		
37	Community Effects Monitoring and Management Plan	Proceed to implement and revise in consultation with the parties listed in Schedule B.	D.1 December 2021	18-Feb-22																		
38	Tenure Holder Communication and Mitigation Plan	Resubmit to the EAO for approval within 60 days following the commencement of Construction.	A.1 December 2021	19-Apr-22																		
39	Final Transmission Line Routing Plan (Phase 1)	1 year prior to start of transmission line construction	F.1 March 2022	19-Apr-22																		
40	Health and Medical Services Plan	Resubmit to the EAO for approval prior to the commencement of Construction.	D.1 April 2022	31-Aug-22																		
41	Country Foods Monitoring Plan	Proceed to implement and revise in consultation with the parties listed in Schedule B.	B.1 December 2021	18-Feb-22																		
43	Master Mitigations Table	Submitted to EAO for review and approval prior to the commencement of construction.	March 2022	31-Aug-22																		
Plans Submitted																						
11	Care and Maintenance Plan	Resubmit to the EAO for approval, within 60 days following start of Construction.																				
25	End Land Use Plan	Resubmit to the EAO for approval, within 60 days following start of Construction.																				
Plans To Be Submitted																						
12	IEM's Project Phase Completion Report	Upon completion of Construction phase																				
12	IEM's Detailed Project Phase Work Plan	Prior to start of Operations phase																				
15	Indigenous Cultural Awareness and Recognition	90 days prior to start of Construction																				
24	Wetland Management and Offsetting Plan	Resubmit to the EAO for approval prior to the commencement of Construction.																				
29	Transmission Line Sedimentation Monitoring Plan	90 days prior to start of transmission line construction																				
31	Tatelkuz Lake Protection Plan	90 days prior to pumping water from Tatelkuz Lake																				

EAC Condition	Document Name	Timing as Outlined in EAC or Revised through EAO Direction	Management Plan Version	EAO Letter Approval Date	Upcoming Submissions															Operations Phase			
					2022			2023									2024						
					Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec		TBD		
33	Mine Waste and Water Management Plan	90 days prior to the start of placing tailings or waste rock under water cover within the tailings storage facility																					
34	Closure and Post-closure Water Quality Management Plan	At the time of the Holder's planned commencement of Operations.																					
35	Tailings Dam Safety Transparency Plan	90 days prior to the start of placing tailings or waste rock under water cover within the tailings storage facility																					
39	Final Transmission Line Routing Plan (Phase 2)	60 days prior to start of transmission line construction																					

6. AMENDMENTS TO THIS PLAN

BW Gold may amend the DSP, including the timelines herein, by providing the proposed amendments in draft form to EAO, EMPR, ENV, FLNRORD, NHA, Indigenous Groups, the District of Vanderhoof, and the Village of Fraser Lake for comment at least of 30 days prior to submitting the amendments to the EAO for review, approval and distribution, which must be done 60 days prior to any revised submission date if the date is being moved forward, unless otherwise authorized by the EAO.

7. REFERENCES

CEA Agency. 2019a. *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.

EMPR & ENV. 2019. *Joint Application Information Requirements for Mines Act and Environmental Management Act Permits*. Ministry of Energy, Mines and Petroleum Resources & Ministry of Environment and Climate Change Strategy.