



Blackwater Gold Project

Community Effects Monitoring and Management Plan

July 2022

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ACRONYMS AND ABBREVIATIONS

Aboriginal Groups or Indigenous nations	Aboriginal Groups include: Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Stelat'en First Nation, Saik'uz First Nation and Nazko First Nation (as defined in the Project's Environmental Assessment Certificate #M19-01)
Artemis	Artemis Gold Inc.
BC	British Columbia
BC EAO	British Columbia Environmental Assessment Office
BW Gold	BW Gold LTD.
CEA Agency	Canadian Environmental Assessment Agency
CEMMP	Community Effects Monitoring and Management Plan
CEMMP-R	Community Effects Monitoring and Management Plan Report
CEO	Chief Executive Officer
COO	Chief Operating Officer
CLC	Community Liaison Committee
CM	Construction Manager
CMHC	Canada Mortgage and Housing Corporation
CMTN	Coast Mountain College
CNC	College of New Caledonia
CRD	Cariboo Regional District
DS	Decision Statement
EA	Environmental Assessment
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
EI	Employment Insurance
EIS	Environmental Impact Statement
EM	Environmental Manager
EMPR	Ministry of Energy, Mines and Petroleum Resources
EMS	Environmental Management System
EPC	Engineering, Procurement and Construction
ERM	ERM Consultants Canada Ltd.
FLNRORD	Ministry of Forests, Lands, Natural Resource Operations and Rural Development
FSR	Forest Service Road
GDP	Gross Domestic Product
GM	General Manager

ICBC	Insurance Corporation of British Columbia
IR	Indian Reserve
ITA	Industry Training Authority
LDN	Lhoosk'uz Dené Nation
LSA	Local Study Area
LMPP	Labour Market Partnerships Program
MiHR	Mining Industry Human Resources Council
Mtpa	million tonnes per annum
NFN	Nazko First Nation
NH	Northern Health
NVMP	Noise and Vibration Effects Monitoring and Mitigation Plan
NWFN	Nadleh Whut'en First Nation
NEWSS	Nechako Environment and Water Stewardship Society
NVIT	Nicola Valley Institute of Technology
RCMP	Royal Canadian Mounted Police
RDBN	Regional District of Bulkley-Nechako
RDFFG	Regional District of Fraser-Fort George
RSA	Regional Study Area
SEM	School of Exploration and Mining
SFN	Saik'uz First Nation
StFN	Stellat'en First Nation
t/d	tonnes per day
TSF	Tailings storage facility
UFN	Ulkatcho First Nation
UNBC	University of Northern British Columbia
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 (BC).

The Project site 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, 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 (BC 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 (or 20 Mtpa) in Year 11 until the end of the 23-year mine life. The closure phase is 24 to approximately 45 years, subject to when the Open Pit has filled and the TSF is allowed to passively discharge to Davidson Creek. 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 *2002 Environmental Assessment Act* (BC EAO 2019c) and a Decision Statement (DS) on April 15, 2019 under the *Canadian Environmental Assessment Act, 2012* (CEA Agency 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 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 Community Effects Monitoring and Management Plan (CEMMP) is to describe the measures that will be implemented to mitigate and monitor the Project's socio-economic effects on Aboriginal Groups, stakeholders, and communities. The CEMMP also describes monitoring and adaptive management measures.

The socio-economic Local Study Area¹ (LSA; Figure 2-1) considered in this CEMMP is the same LSA as described in the Project's Application for an Environmental Assessment Certificate / Environmental Impact Statement (Application/EIS; New Gold 2015) and represents the area where communities may experience direct social or economic effects of the Project. The LSA overlaps with the traditional territories of LDN, NFN, SFN, NWFN, StFN, UFN, Skin Tyee Nation, Tsilhqot'in Nation, Nee Tahi Buhn Band, Cheslatta Carrier Nation, and Yekooche First Nation. The following populated communities within the LSA (LSA communities²) are: Vanderhoof; Fraser Lake; LDN reserves (*Kluskus 1, *Tateluk Lake 28, *Sundayman's Meadow 3); NFN reserves (*Euchinico Creek 17, *Trout Lake, Alex 16, *Nazco 20); SFN reserves (Stony Creek 1, *Laketown 3); NWFN reserves (Nautley [Fort Fraser] 1, *Seaspunkut 4); and StFN Reserve (Stellaquo 1).

The Regional Study Area³ (RSA; Figure 2-1) considered in this CEMMP, similarly to the RSA in the Project's Application, represents the area where indirect social or economic impacts may be experienced as a result of Project employment and goods and services procurement. The RSA overlaps with the traditional territories of Indigenous nations in the LSA as well as the Nak'azdli Nation, Takla First Nation, Ti'azt'en First Nation, Binche Whut'en First Nation⁴, Burns Lake Nation, Lake Babine Nation, and Wet'suwet'en First Nation. Communities likely to experience direct and indirect social or economic effects include Prince George, Burns Lake, Fort St James, and Quesnel, and the Indigenous communities of UFN, as well as those of LDN, StFN, SFN, NWFN and NFN that are not located in the LSA.⁵

The LSA and RSA are shown in Figure 2-1. However, for the purpose of this CEMMP, a list of primary communities was selected from the LSA and the RSA for which monitoring, as described in this CEMMP, would take place. These primary communities, shown on Figure 2-2, include:

- | | |
|-----------------|--------------------------------------|
| ■ Vanderhoof | ■ Lhoosk'uz Dené Nation (LDN) |
| ■ Fraser Lake | ■ Nazko First Nation (NFN) |
| ■ Prince George | ■ Saik'uz First Nation (SFN) |
| ■ Burns Lake | ■ Nadleh Whut'en First Nation (NWFN) |
| ■ Fort St James | ■ Stellat'en First Nation (StFN) |
| ■ Quesnel | ■ Ulkatcho First Nation (UFN) |

¹ The LSA described in the Application/EIS includes the Cariboo Regional District (CRD) Electoral Area (EA) I (Nazko West Fraser) and Regional District of Bulkley-Nechako (RDBN) EA D (Fraser Lake Rural) and EA F (Vanderhoof Rural). Electoral areas have not been included in the CEMMP as these communities are not anticipated to experience adverse effects from the Project. The Project is located within the CRD Area I; however, there is no direct access to the Project from communities in this area.

² There is limited Census data for communities marked by *.

³ The RSA is described in the Application/EIS. Electoral areas within the RSA as identified in the Application/EIS, namely RDBN EA C (Fort St James Rural) and EA B (Burns Lake Rural), and Fraser-Fort George Regional District (FFGRD) EA C (Chilako River-Nechako), are not included in the scope of the CEMMP to avoid duplication of data collection and analysis for those communities anticipated to experience Project effects (e.g., Burns Lake).

⁴ The Binche Whut'en First Nation separated from the Ti'azt'en Nation in 2019.

⁵ All of the communities that may be impacted by the Project, other than Prince George, are members of the CLC.

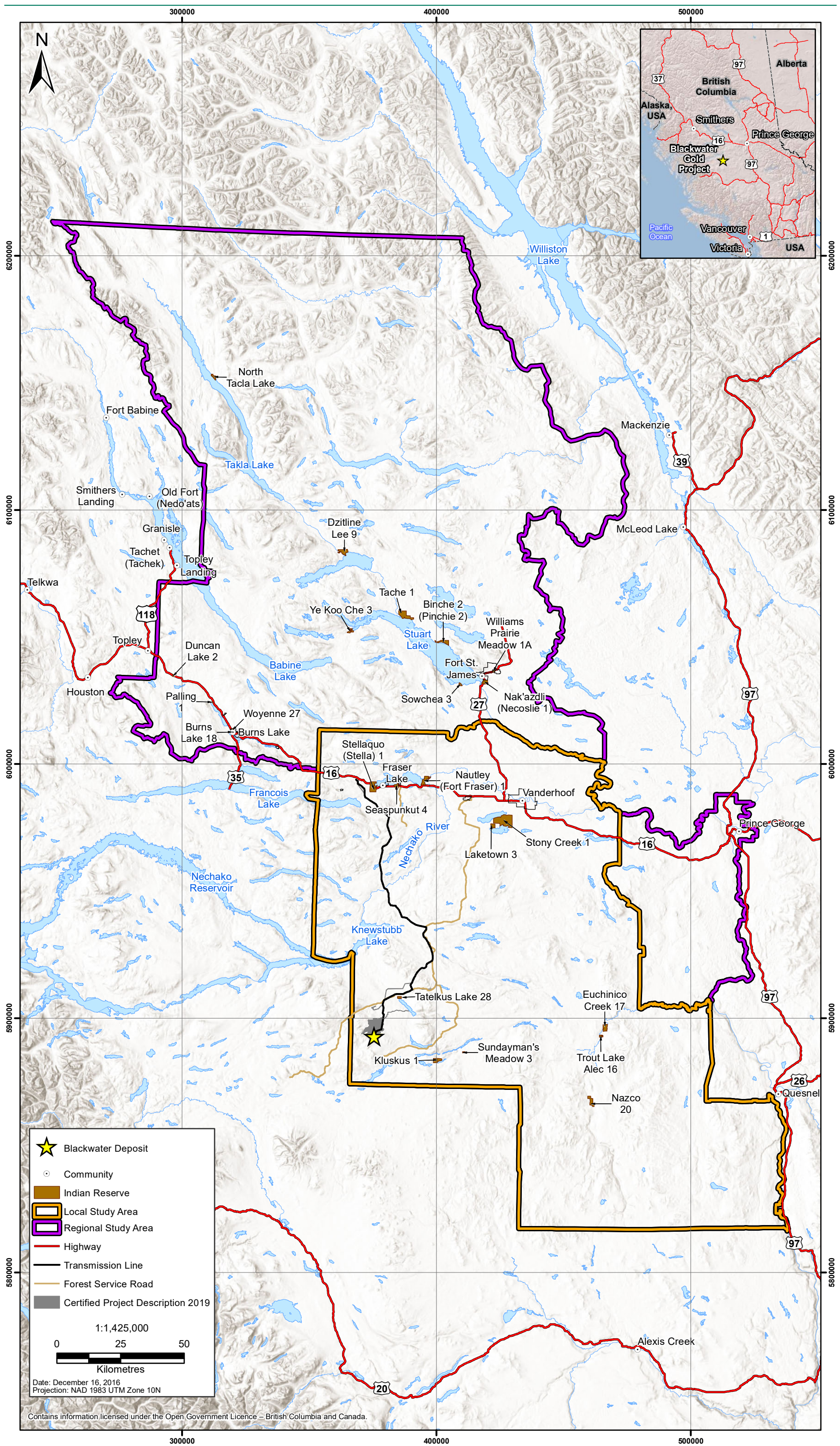


Figure 2-1: Socio-Economic Local and Regional Study Area

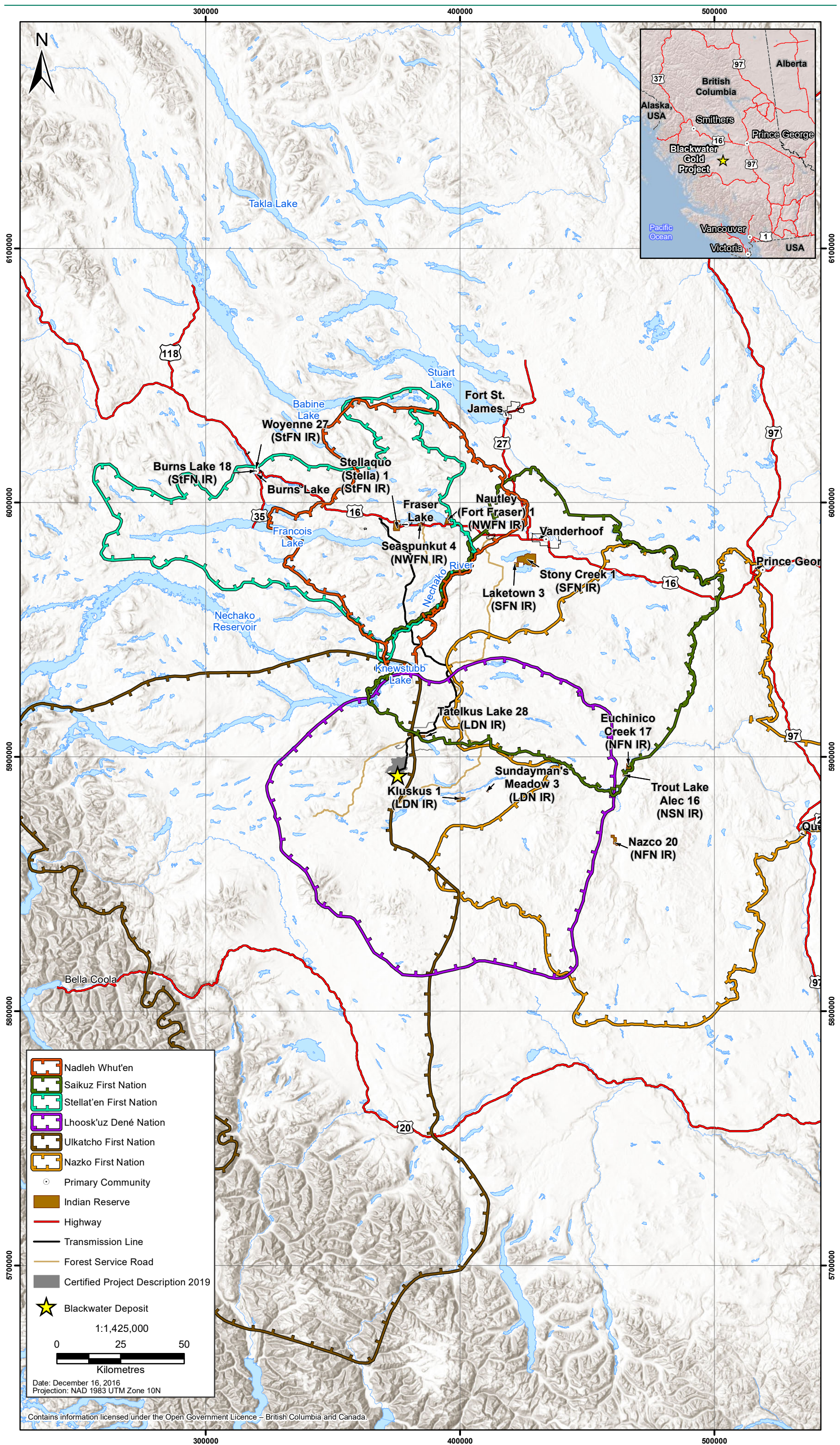


Figure 2-2: CEMMP Primary Communities

Additional communities may be identified and included in the CEMMP should the Project effects extend to other communities. Socio-economic impact monitoring, input from the Community Liaison Committee (CLC) and the Feedback Mechanism (Section 11) will help inform the scope of this CEMMP.

The CEMMP addresses the requirements in EAC Condition 37 and has been prepared by a Qualified Person with a minimum of five years relevant experience in the assessment and management of the social effects associated with major mines or industrial facilities. The location of EAC Condition 37 requirements in the CEMMP are identified in a concordance table in Appendix A. As required by Condition 37, the plan will be implemented during construction (Year -1 and Year -2), operations (Year 1 to Year 23) and the first five years of closure.

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, Independent Tailings Review Board, TSF Qualified Person, and other Qualified Persons and Professionals.

Table 3-1: BW 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 Environment & Social Responsibility 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, 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 their responsibilities to 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 and Community Relations Manager	Indigenous and Community Relations Manager is responsible for Indigenous and community engagement throughout the life of mine, and day-to-day management and communications with Indigenous groups and stakeholder communities. Reports to VP, Environment & Social Responsibility.

Position	Responsibility
Aboriginal Monitors	Aboriginal Monitors are required by EAC #M19-01 Condition 17 and will be responsible for monitoring the Project's potential effects on Aboriginal interests. Aboriginal Monitors will be involved in 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 Professionals or Qualified Persons (QP)	Qualified professionals and qualified persons will be retained to review objectives and conduct various aspects of the Project's environmental and social monitoring as specified in EMPs and social MPs.

BW Gold will employ a qualified person as an EM who will oversee that throughout the Construction phase 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 Environmental Monitors that will include Environmental Specialists and Technicians and a consulting team of subject matter experts in the fields of environmental science, engineering, and social.

During the Construction phase, the EPCM contractor and sub contractors will report to the CM. The EPCM contractor will 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, the Company 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 has been addressed and concerns 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 Company Corporate Office and 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 Managers (e.g., mining, milling, and plant/site services) will be directly responsible for implementation of the EMS and MPs 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. The Mine Manager will maintain overall responsibility for management of Closure and Post-closure activities.

Pursuant to Condition 19 of the Project's EAC #M19-01, BW Gold has established an Environmental Monitoring Committee (EMC) 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 EAC Condition 17, Aboriginal 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.

3.1 Community Liaison Committee

Prior to the Project entering the environmental assessment (EA) process, a community advisory committee was established in 2012 to provide input on the Project. The committee included representatives from local governments, educational institutions, and not-for-profit organizations in the region.⁶

In accordance with EAC Condition 37, BW Gold has established a CLC. To maintain continuity, original members from the community advisory committee were invited to join this new committee. CLC members include representatives from the UFN, LDN, NWFN, StFN, SFN, NFN, Vanderhoof, Fraser Lake, Burns Lake, Fort St. James, Quesnel, RDBN, CRD, NH, School District #91, College of New Caledonia (CNC), Connexus Community Resources, and Nechako Environment and Water Stewardship Society (NEWSS).

As described in the CLC Terms of Reference (Appendix B), the purpose of the CLC is to:

- provide information on Project effects in members' communities;
- provide advice to the Holder on mitigation measures to address social and economic effects; and
- review and comment on the CEMMP and its implementation.

Through regular and ongoing CLC meetings (Appendix B, Section 3.3 of the CLC Terms of Reference), there will be an opportunity for BW Gold to understand the extent of anticipated social or economic effects and the effectiveness of mitigation measures, as well as emerging or unanticipated effects. In addition to ongoing advice, the CLC will be engaged in the annual data collection, analysis, and review of the findings. It is expected that the CLC will provide advice on adaptive management measures.

⁶ Original committee members included representatives from Vanderhoof, Fraser Lake, Village of Burns Lake, Fort St. James, Quesnel, RDBN, CRD, Northern Health Authority (now named Northern Health), School District #91, CNC, Connexus Community Resources and NEWSS.

4. COMPLIANCE OBLIGATIONS, GUIDELINES AND BEST MANAGEMENT PRACTICES

4.1 Legislation

Federal legislation applicable to the CEMMP includes:

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

Provincial legislation applicable to the CEMMP includes:

- *Mines Act*;
- *Health, Safety and Reclamation Code for Mines in British Columbia*;
- *Declaration on the Rights of Indigenous Peoples Act*;
- *Environmental Assessment Act*;
- *Employment Standards Act*;
- *Forest and Range Practices Act*,
 - *Forest Service Road Use Regulation*;
- *Public Health Act*;
 - *Industrial Camps Regulation*.

4.2 Environmental Assessment Certificate and Federal Decision Statement Conditions

The CEMMP addresses the requirements in EAC Condition 37, which requires the Holder to: a) establish and maintain a CLC; and b) develop a CEMMP.

The Decision Statement includes conditions 6.1 through 6.15 related to health and social and -economic conditions (Conditions 6.1 and 6.15), which are beyond the scope of the CEMMP. The requirements in these conditions are addressed in other management plans, including: the Wildlife Mitigation and Monitoring Plan (Appendix 9-H of the Project's Joint *Mines Act / Environmental Management Act* Permits Application), the Air Quality and Fugitive Dust Management Plan (Appendix 9-O of Joint *Mines Act / Environmental Management Act* Permits Application), and the Country Foods Monitoring Plan (EAC Condition 41).

4.3 Existing Permits

There are no existing permit conditions related to social or economic effects management or monitoring.

4.4 Guidelines and Best Management Practices

Socio-economic effects monitoring is required to evaluate the accuracy of effects predicted in the Application/EIS (New Gold 2015), to investigate the effectiveness of mitigation measures implemented by the Project, and to identify any other potential changes to communities emerging from the Project that were not identified during the EA process.

Monitoring and managing social or economic effects in complex and dynamic community settings is challenging. Monitoring is further challenged by limited relevant, publicly available and up-to-date

socio-economic information that can be used to test predictions of the Project effects. In consideration of the evolving field of socio-economic monitoring, this plan has been informed by the following literature and best practices:

- Mining Industry Human Resources Council (MiHR) guidance, such as the Mining Workforce Transition Kit – A Tool to Support Employees at Mine Closure, the Guide for Aboriginal Communities, and information on training and certification for mining, and diversity and inclusion in the workforce (MiHR 2020a, 2020b).
- BC Guidelines for Industrial Camps Regulation (Government of BC 2017).
- Indigenous Communities and Industrial Camps (The Firelight Group 2017).
- Standard Working Group Comments and Recommendations for Provincial Environmental Assessments in Northern British Columbia (NH 2015).
- Mining Association of Canada (MAC)'s Towards Sustainable Mining: Mine Closure Framework (MAC 2008).
- Involvement of communities and services providers in the collection and review of monitoring indicators and data.
- Incorporation of a feedback mechanism that includes a transparent complaints response process.

5. ADAPTIVE MANAGEMENT

5.1 Framework

The CEMMP is a living document that will evolve over time in response to the results of the monitoring program, changing conditions or development at the site, and through consultation with the CLC and local communities and in consideration of feedback (Section 11.2).

The plan incorporates adaptive management as follows:

- **Plan**
 - Identify monitoring indicators in consultation with CLC.
 - Define triggers.
 - Establish community feedback mechanism.
- **Do**
 - Implement mitigation measures.
 - Regular meetings with CLC.
- **Monitor**
 - Monitor indicators.
 - CLC annual survey.
 - Record keeping to verify ongoing implementation of plan.
- **Adjust**
 - Review effectiveness of control measures.
 - Consider community and CLC feedback.
 - Update the plan as required.

5.2 CEMMP Baseline Information and Indicators

Upon the approval of this CEMMP and in collaboration with the CLC, BW Gold will collect current socio-economic data that aligns with the indicators described in Table 10.1-1 of this plan. This will provide a baseline of data that can be used to track changes within the socio-economic setting and to understand any Project effects on communities anticipated to be affected by the Project.⁷ The baseline indicators may include relevant data from the Application/EIS (New Gold 2015) as well as new or updated information (including inputs from CLC members), where available.

⁷ The baseline data indicators will focus on data collection for communities that may experience Project effects, namely Vanderhoof, Prince George, Fraser Lake, Burns Lake, Fort St James, and Quesnel, and the Indigenous communities of UFN, LDN, StFN, SFN, NWFN, and NFN.

6. REGIONAL SOCIO-ECONOMIC OVERVIEW

Communities located in proximity to the Project provide the closest and most accessible sources of labour, goods, and services for Project construction and operations. These communities are listed in Section 2.

Economic activity in those communities and in the region includes the forestry sector (logging, wood products and by-product manufacturing), the public sector (health care, social services, education and public administration), and to a lesser degree, agriculture and ranching, mining, and the service sector (AMEC 2013a; Statistics Canada 2016). The forestry sector contributes about two percent to the provincial gross domestic product (GDP; Statistics Canada 2021; FLNRORD 2019). The mining and oil and gas sectors are not a large employer in the region, providing less than four percent of the jobs in the RDBN and one percent of the jobs in Prince George in 2016 (Statistics Canada 2016).

While regional population has been declining over the past decade, the population of some communities in the region has been stable or increased. Housing in the region is considered to be affordable and house prices are below the provincial average. Regional and community infrastructure is in good condition and of suitable capacity to meet future growth. Local and regional services, including schools, health care, social and emergency services operate below capacity and are able to meet the current demand. However, local communities typically have lower income levels, higher crime, more at-risk youth, and lower overall well-being compared to the provincial averages (AMEC 2013a, 2013b).

There are a variety of recreational opportunities in the region, including snowmobiling, skiing, sledding, fishing, hunting, hiking and horseback riding. Other land uses include guide outfitting, trapping, and eco-tourism (AMEC 2013c).

Current use of land and resources for traditional purposes by Indigenous peoples includes fishing, hunting, trapping, gathering, and the use of habitations, trails, and cultural and spiritual sites (AMEC 2013c). Mount Davidson, the location of the mine site, is identified by UFN and LDN community members as a sacred site. The mountain holds traditional healing powers and historically has also been an important hunting and berry picking site (Keefer Ecological Services Ltd. 2019). Historically and culturally significant trails within 20 km of the Project include the Messue Wagon Road, Messue Horse Trail/Kluskus Bypass, and the Nuxalk Carrier Grease Trail (also referred to as Alexander Mackenzie Heritage Trail). These trails were used in earlier periods as Grease trails by Indigenous nations (ERM 2016).

7. PROJECT BENEFITS

Through Project employment and procurement, the Project is anticipated to provide significant economic benefits to regional, provincial and federal economies. These benefits include employment and income for direct Project workers and contractors, and those resulting from spin-off opportunities, including: employment in supplier industries (indirect employment); and, employment further down in the supply chain (those resulting from workers spending their income, referred to as induced employment). Additional benefits will include procurement opportunities resulting from spin-off opportunities, higher provincial GDP, and an increase in local government and provincial tax revenue.

The total Project's capital expenditure (CAPEX) is estimated at \$1.5 billion, including \$1.38 billion in procurement of goods and services, as well as \$34 million in wages (KPMG 2020). By construction phase, the Project's estimated capital cost is \$592 million for phase 1 development, \$426 million for the Phase 2, and \$398 million for the phase 3 expansion, for a total of \$1.4 billion. Sustaining capital over the life of mine is estimated at \$637M (Artemis 2020). The operations phase is 23 years with average annual operating costs (OPEX) estimated at \$284 million (including \$249 million on procurement and \$47 million on wages), for a total of \$6.5 billion.

Project construction and operations are anticipated to support a total (direct, indirect, and induced) of 7,487 person-years of employment or 1,499 jobs on average per year over approximately five years. Of this, direct employment would represent 4,123 person-years or an average of 825 jobs. The Operations phase is expected to support a total (direct, indirect, and induced) of 31,418 person-years of employment or 1,366 jobs on average annually over the 23-year operating period in BC. Of this, 457 direct jobs per year would be created for workers from BC. Total employment impacts in Canada would total 9,082 person-years of employment or 1,816 jobs on average per year over the five-year construction phase, while the operations phase would support 35,029 person-years or 1,523 jobs annually over 23 years (KPMG 2020).

BW Gold is planning to hire locally where possible, with the Project's workforce potentially sourced from Prince George, Vanderhoof and Quesnel (KPMG 2020). Total (direct, indirect, and induced) income benefits for construction are estimated at \$416 million while income benefits for operations are estimated at \$90 million per year.

Taxes paid to local, provincial and federal governments would total \$158 million a year or \$3.6 billion during Project construction and operations. Total expected tax revenues from the construction phase amount to \$105 million in provincial taxes, \$110 million in federal taxes and \$15 million in local government taxes. The remaining \$3.4 billion would be realized during operations, with \$2.2 billion in provincial taxes, \$1.4 billion in federal taxes and \$58 million in local government taxes. Of the total \$3.6 billion in tax revenue during construction and operations, \$1.5 billion would benefit the federal government, \$2.3 billion (including \$42 million in royalties) would benefit the provincial government, while the remaining \$73 million would go to local government (KPMG 2020).

These represent substantial economic benefits that will support the economic activity in the region and the province over a period of 28 years.

8. SOCIO-ECONOMIC EFFECTS AND MITIGATION MEASURES

Potential social or economic effects identified in the Application/EIS (New Gold 2015) and considered in this CEMMP include:

- Changes to population and demographics due to in- and out-migration of workers and their families during Project phases;
- Changes to community services including educational, health and emergency, and social services due to changes in population associated with Project employment;
- Changes in crime and socially disruptive behaviour and associated demand on protective services due to transient Project-related workforce; and
- Changes to community and family well-being as a result of socially disruptive behaviour from transient Project-related workforce, poor use of disposable income from employment at the Project affecting family well-being, or strain or deterioration of family units due to Project-related work rotations. Loss of employment during temporary or permanent closure may also result in changes to community and family well-being.

8.1 Recruitment and Employment Measures

The Project is expected to support growth in the region, primarily in Prince George and Vanderhoof, as most of the work force is expected to come from these communities. The Project will work to maximize the number of local workers and to encourage workers to relocate to the region. Targeted efforts will be undertaken to recruit and hire a diverse workforce including underrepresented segments of the population, such as Indigenous people, women, mature workers, youth, people with disabilities, ethnic minorities, and new Canadians.⁸ Such groups are at higher risk of being subject to social or economic impacts of mining, or unequal participation in project benefits.

Given the size of the construction workforce, it is expected that beyond Prince George and Vanderhoof, workers will also be recruited from other parts of BC and the rest of Canada. BW Gold is planning to undertake construction activities, and to contract one or more EPCs (engineering, procurement and construction) company. Any relevant recruitment and employment commitments in Participation Agreements with Aboriginal Groups and mitigation measures would be included in contracts with EPC and contractors. These commitments could include advertisement of local business opportunities, a defined process to hire workers from diverse groups of the population, and targeted engagement opportunities.

The implementation recruitment measures that target the primary communities, as well as focus on diversification of the workforce will facilitate BW Gold's ability to hire employees and contractors from primary communities (Figure 2-1).

Recruitment measures to be implemented during different phases of the Project are described in Table 8.1-1.

BW Gold will implement measures to retain employees once they have been hired by the Project. Retention measures to be implemented during different phases of the Project are described in Table 8.1-2.

⁸ The short-list of underrepresented groups is based on Mining Industry Human Resources Council diversity research (https://mihr.ca/wp-content/uploads/2020/03/TakeActionforDiversity_2011_ENG.pdf).

Table 8.1-1: Recruitment Measures

Measure	Construction	Operation	Closure
Advertise job opportunities on the Blackwater Project website, social media (LinkedIn), local radio, newspapers, flyers, video, mining focused, in Indigenous band offices and Indigenous-focused employment websites, direct communications with CLC members, and local community meetings and job fairs. Directly outreach to potential candidates on LinkedIn. Work with WorkBC to assist with recruitment.	✓	✓	
Identify job opportunities that can be filled by diverse workforce and conduct targeted and tailored recruitment and communications with organizations that support diverse groups including Indigenous workers, women, mature workers, youth, people with disabilities, ethnic minorities, new Canadians and other populations. ⁹ Define clear processes to include these diverse groups in community engagement initiatives.	✓	✓	
Create compelling job descriptions by accurately describing the role and responsibilities, describing how the role fits within the overall Project, including a list of hard and soft skills required for the position, and describing the Project culture.	✓	✓	
Engage recruitment firm(s) to assist with senior management and key hires (Departmental heads) and make the recruitment and employment process as simple and transparent by disclosing interview processes and timelines.	✓	✓	
Partner with CLC members, WorkBC, Aboriginal Groups communities, University of Northern BC (UNBC), and College of New Caledonia (CNC) to explore opportunities to notify their communities about recruitment efforts and job opportunities.	✓	✓	

Table 8.1-2: Retention Measures

Measure	Construction	Operation	Closure
Prepare comprehensive orientation packages for employees, and including packages targeted at a diverse range of employees. Targeted orientation packages will provide information on employment for the Project and will include, where available, specific resources to support employees who are not typically included in mining employment.	✓	✓	
Provide incentives for employees to re-locate to local communities. Such incentives could include paid time to accommodate moving and related moving expenses.		✓	
Where possible, perform exit interviews to collect information regarding the reason for departure to gain insights into employee experience and collect suggestions for improving employee retention.	✓	✓	

⁹ BW Gold has identified, for example, Connexus, a member of the CLC, which runs programs to support people with disabilities to enter the workforce.

8.2 Skills Training

BW Gold will implement a training strategy to facilitate its ability to hire employees and contractors from the region. The training strategy will be developed by working with local and BC-based training institutions, including those that specialize in training and skills for Indigenous people, and will target potential and existing Project employees (e.g., UNBC, CNC, Nicola Valley Institute of Technology (NVIT)¹⁰, or Industry Training Authority (ITA)¹¹. Skills development will be supported by establishing relationships with local businesses to arrange apprenticeships. Training will be provided to enable employees to keep their skills up to date and keep abreast of technology.

Table 8.2-1 summarizes BW Gold training and skill development commitments for potential employees, and Table 8.2-2 summarizes training and skill development commitments for existing employees.

Table 8.2-1: Skills Training Commitments for Potential Employees

Measure	Construction	Operation	Closure
Support education and skill development opportunities to help prospective workers meet entry requirements, including communications regarding skills that are needed to meet entry level positions, early communication about available jobs, education requirements.	✓	✓	
Collaborate with UNBC and CNC, and School Districts (i.e., School Districts #91, 28, 57, and 27), including participating in job fairs and speaking to classes to provide information on the Blackwater Project and range of jobs and education requirements.	✓	✓	
Work with the Mining Industry Human Resource Council (MiHR) to deliver “Mining Essentials: Work Readiness Training for Indigenous Peoples,” custom-tailored to the Project, to local high schools in School District #91 (MiHR 2021).	✓	✓	
Take advantage of the BC Indigenous Skills Training Programs Inventory and programs such as the Labour Market Partnerships Program (LMPP), which provides funding to industry sector partnerships to help them identify and plan for their skill and workforce needs or the BC’s Entry Level Trades Training Program that provides pre-apprenticeship and public training (WorkBC 2019).	✓	✓	
Support Post-Secondary Institute (PSI) partnerships to deliver programs. Partner with CNC, NVIT and the Coast Mountain College (CMTN) and its School of Exploration and Mining (SEM) ¹² CMTN provides training mobile campus in various communities that allows for direct program delivery in any location (CMTN 2021). This partnership would be developed to support skills development.	✓	✓	
Offer scholarships for secondary and post-secondary institutions to Indigenous and non-Indigenous students in pursuing careers in trades, engineering, environmental sciences and occupational health and safety.	✓	✓	

¹⁰ NVIT is BC’s Indigenous Public Post-Secondary Institute (PSI) (available at <https://www.nvit.ca/>).

¹¹ ITA offers targeted programs for women, youth, and Indigenous people (available at <https://www.itabc.ca/>).

¹² CMTN SEM provides training for the mining industry and workforce located in Northern BC.

Table 8.2-2: Skills Training Commitments for Existing Employees

Measure	Construction	Operation	Closure
Develop site orientation for employees and contractors, which would cover topics such as occupational health and safety, cultural awareness, harassment and micro-aggression training, wildlife awareness, waste management and cultural heritage chance find procedure. Training will be required for all employees and contractors to work on site. Annual training on particular topics may be repeated or new training added on-as-needed basis to promote a harassment-free workplace. Crew talks/tailgate talks may also address these topics.	✓	✓	✓
Require that BW Gold senior management participate in cultural competence and general workplace harassment training to support their ability to promote a harassment-free workplace.	✓	✓	✓
Employees and contractors will also be introduced to the Project's Community Feedback Mechanism (Section 11.2) and any employee-specific mechanisms for providing feedback or complaints. The orientation will prepare company representatives to understand the investigation process, in the case they are involved. The orientation will include an overview of employee rights.	✓	✓	✓
Provide on-the-job training in health and safety, equipment operation, occupational awareness, and job specific training.	✓	✓	
Define career development goals for employees and training needs to support employee career advancement.	✓	✓	

8.3 Employee Supports and Services

BW Gold will implement measures to support employees while they are employed on the Project. While on rotation, on-site health services will be available to meet the workforce's urgent and non-urgent health care needs, promote health, and support worker wellness, as described in the Health and Medical Services Plan (EAC Condition 40). BW Gold recognizes that shift rotations can be stressful for employees and their family, potentially resulting in adverse effects to employees' health and wellbeing. Table 8.3-1 identifies measures to support BW Gold employees and their families.

Table 8.3-1: Employee Supports and Services

Measure	Construction	Operation	Closure
Provide incentives for employees to re-locate to communities to reduce the time away from their families. Such incentives could include paid time to accommodate moving and paid moving expenses.		✓	
Implement Employee Assistance Program for Project employees to provide confidential counselling, referrals and other support for employees and their families.	✓	✓	✓
Provide health and wellness program, including recreational facilities and healthy food options in the cafeteria.	✓	✓	✓

Measure	Construction	Operation	Closure
Provide financial literacy training to interested BW Gold employees, delivered based on demand, to provide tools needed for effective money management (e.g. understanding affordability, budget planning, and planning for savings and investment).	✓	✓	✓
Implement zero-tolerance alcohol, drug and harassment policies.	✓	✓	✓
Provide communications (phone, computer and Internet) for employees to communicate with families and friends while residing at the camps.	✓	✓	✓

8.4 Employee Accommodation, Transportation, and Traffic Management

Employees and contractors will reside in camp accommodations while working on the Project during all phases of the Project. Project staff (employees and contractors) will stay at the camp when practical and when another option is not available.

To minimize traffic on the Kluskus and Kluskus-Ootsa Forest Service Roads (FSRs), employees and contractors will be bused or shuttled to the mine site from defined pick up points. Employees will not be allowed to drive personal vehicles to the mine site, except under limited and identified circumstances¹³. To manage traffic along the Kluskus and Kluskus-Ootsa FSRs, bus and/or shuttle drivers will be required to: adhere to speed limits, adjust speed to road conditions, and implement procedures for approaching vehicles with oversize/overweight loads.

Buses transporting employees and leaving from Vanderhoof will have a defined route, which will be shared with the CLC and posted to the Project website.

The Community Feedback Mechanism (Section 11.2) describes how BW Gold will seek and respond to concerns about the Project, including Project traffic and bus route.

¹³ Such circumstances may include senior management staff who are required flexibility in locations and timing of meetings, employees or contractors with disabilities who need special access if not available on shuttle service, and employees requested to support Project activities on special basis (outside of their work schedule or regular shifts).

9. TEMPORARY AND PERMANENT CLOSURE

Closure and reclamation are core elements of the Project since ore bodies are finite and therefore exhausted over time. Successful closure depends on planning in advance and the involvement of local communities to identify measures to mitigate the social and economic impacts of closure. Temporary closure planning will adhere to BC's employment standards regarding temporary layoff of workers (Government of BC 2021). Closure planning for the BW Gold Project will also consider mine closure planning guidelines prepared by the Mining Association of Canada (MAC)'s Towards Sustainable Mining: Mine Closure Framework (MAC 2008).

Measures to mitigate social and economic effects associated with temporary closure or shutdown will follow BC employment laws and standards. The measures include:

- Provision of notice with reasonable notice related to pending temporary closure.
- Development of a communications strategy that provides for updates to communities and employees on Project status.
- Timely preparation of materials to support employee applications for Employment Insurance (EI) benefits.
- Provision of reasonable notice related to return to work.

Measures to mitigate permanent closure effects will follow BC employment laws and standard. These measures will include:

- Transition plan. Develop a transition plan in advance of planned permanent closure to identify measures to mitigate social and economic impacts of closure and help employees navigate services to facilitate future employment. The plan would be developed in consultation with the CLC and would identify measures to assist employees in:
 - finding new work, which could include career counselling;
 - preparing CVs;
 - setting up LinkedIn profiles;
 - using on-line job search tools; and
 - preparing materials to support employee applications for EI benefits.
- Social investment. Working collaboratively with the CLC and primary communities, identify strategies and social investment opportunities to mitigate social and economic impacts of closure. Such measures could include investment in education and training for skills that support mining and other sectors that may be present post-closure, such as digital skills and working with autonomous vehicles, as well as development of legacy projects (e.g., computer labs for schools or libraries).
- Communication. Develop a communications strategy to provide, timely, clear and transparent information on planned closure to inform potentially impacted employees, businesses and organizations with established partnerships to facilitate planning and proactive decision-making.
- Focus on local content. Retain local workers and suppliers to support Project closure and post-closure activities.

10. SOCIO-ECONOMIC IMPACT MONITORING AND ADAPTIVE MANAGEMENT

Approaches for community effects monitoring and management will evolve and these programs must be developed to reflect the unique community context of each project, and in consultation with those communities that are affected. This section outlines the monitoring program, including data limitations, baseline data collection, and approach to impact monitoring.

10.1 Limitations

BW Gold anticipates that it will be challenging to disaggregate monitoring data and attribute any changes to indicators to the Project. This limitation will be mitigated by monitoring changes over time to identify negative trends. Socio-economic effects monitoring is further challenged by limited relevant, publicly available, and up-to-date information that can be used to test EA predictions.

Indicators presented in Table 10.1-1 have been identified as information that, over time, will support the monitoring of changes in social and economic conditions in communities expected to experience Project effects. Where possible, several data sources are identified to amplify, improve and refine the data. It may not always be possible to directly attribute a socio-economic change in a community to the Project based on quantitative data. As such, BW Gold also intends to include qualitative data collection through interviews with CLC members (Section 10.3) and review of input received through the feedback mechanism (Section 11.2). In accordance with the adaptive management framework, new indicators may be identified to support monitoring efforts. In the case of unforeseen impacts identified through the Community Feedback Mechanism, feedback from the CLC and other stakeholders, and at the discretion of the Qualified Person based on professional experience, BW Gold will identify new indicators to be monitored.

10.2 CEMMP Baseline Information and Indicators

Upon the approval of the CEMMP, BW Gold will employ a Qualified Person to collect Project- and community-specific data in alignment with the indicators described in Table 10.1-1. This baseline indicator data will be collected for the communities that are anticipated to experience social or economic effects, namely Vanderhoof, Prince George, Fraser Lake, Burns Lake, Fort St James, and Quesnel, and the Indigenous communities of UFN, LDN, StFN, SFN, NWFN, and NFN (Section 2). This data will provide a foundation for effects monitoring and will be used to track social and economic changes and to assess Project effects on communities.

In the case that additional communities indicate that they are experiencing social or economic effects of the Project (e.g., based on feedback or complaints received through the Community Feedback Mechanism or through CLC engagement), BW Gold will compile a data set, including any available data pre-construction, where publicly available. This information will then be compared against the conditions at the time, during which effects are being experienced, to determine if there is correlation between Project activities and impacts to these communities. Once identified as a potentially affected community, effects monitoring and reporting will be undertaken as outlined in the CEMMP.

10.3 Data Sources and Collection

Social or economic effects include real and perceived effects and it is important for the Project to collect quantitative and qualitative information.

Table 10.1-1 identifies the indicators to be monitored and identifies their data sources. Indicators include proxy measures and are selected in consideration of indicators used in the Application/EIS (New Gold 2015), indicators identified by the CLC, or indicators that provide useful context or otherwise inform the interpretation of Project impacts or effectiveness of implemented mitigation. Altogether, 14 potential

effects are tracked using 52 indicators (Table 10.1-1) for population and demographics¹⁴, regional and community services¹⁵, and family and community well-being¹⁶ that represent broad categories for the identification and monitoring of social and economic (community) impacts.

Data and information collected and used will be stored in a secure Project folder for verification and reference, as needed.

Publicly Available Sources

BW Gold will use baseline data and information presented in the Application/EIS (New Gold 2015). Data and information pertaining to Project-related activities will be provided by BW Gold. Additionally, in alignment with annual monitoring, BW Gold will collect information from publicly available sources, as listed in Table 10.1-1.

CLC Data and Input/Feedback

Publicly available statistics, such as BC Stats, may not accurately present existing conditions. As such, supplementary data will be collected in collaboration with CLC members to provide current and reliable information on conditions in potentially affected communities. In alignment with best practice for community effects monitoring and management, CLC members will be engaged to provide program or service specific data that is not publicly available. A preliminary list of data to be solicited from CLC members is identified in Table 10.4-1.

BW Gold will work with CLC members to collect data relevant using an Information Request Form, (Appendix C) and complemented with an interview. Through this process, BW Gold will obtain both quantitative and qualitative information that will refine its understanding of direct and indirect Project impacts. The Information Request Form includes questions related to community perceptions of the state of the real estate market, the use of community utility and waste disposal services, the use of recreational or/and social services in each community. The supporting interview will allow BW Gold to further elaborate on this data as well as collect information related to potential impacts of the Project on vulnerable groups, such as Indigenous people, women, youth, unskilled workers, and minorities. For example, the interview may include discussion on any real or perceived changes in the availability of services or increased time to receive support services for vulnerable groups or individuals.

The Information Request Form and proposed interview date will be provided to CLC members/data sources, at least 60 days before the initiation of the CEMMP's annual monitoring activities. Each member will be asked to complete the Form and return it to BW Gold within 30 days of its receipt. This timeline is important to support and maintain the consistency of the reporting requirements (Section 12).

Additional to this formal information request and interview process, CLC members will be sharing information and providing advice to BW Gold through their regular and ongoing meetings. CLC meeting minutes will also be referenced as a data source.

Confidentiality and Data Protection

Data collection will follow appropriate measure to protect the privacy of residents and businesses in local communities and include provisions to ensure representative collection of data as related to vulnerable groups. Data reporting will be suppressed for fewer than 15 individual entities. BW Gold and the CLC are expected to comply with this data collection and reporting approach and timeline.

¹⁴ Relates to impacts on population and demographics (ii.) - Condition 37, b), ii)

¹⁵ Includes educational, health, protective, and social services and relates to impacts on community services (i.) - Condition 37, b), ii)

¹⁶ Relates to impacts on crime and socially disruptive behaviour (iii.); and impacts on community and family well-being (iv.) - Condition 37, b), ii)

Table 10.1-1: Potential Effects and Indicators to Support Socio-economic Effects Monitoring

Category	Monitored Effect	Phase(s)	Anticipated Effect Direction or Trend	Mitigation Measure	Monitored Indicators ¹⁷	Source
Population and demographics	Change in population due to Project workforce and their families	Construction	↑	<ul style="list-style-type: none">Focus recruitment and hiring efforts on primary communitiesProvide self-contained camp to accommodate workersProvide incentives and inducements for employees and management team to reside in an Affected Community	<ul style="list-style-type: none">Population estimates in communities anticipated to experience Project effectsProject employment by community (employees/contractors)Changes in community residency status of Project contractors/employeesCommunity-specific in/out-migration data	<ul style="list-style-type: none">BC StatsBW GoldContractorsCLC
		Operation	↑			
		Closure (first 5 years)	↓			
Regional and Community Services (Educational Services)	Change in demand for education services due to Project workforce and their families	Construction	↔	<ul style="list-style-type: none">Focus recruitment and hiring efforts on primary communitiesProvide self-contained camp to accommodate workers (Project camp will reduce or limit in-migration and related demand for school services by families of workers)Work with training institutions to support or provide training programs (this measure will aim to increase employment from primary communities)Work with local service providers and communities to develop a mine Closure Plan that identifies strategies and actions to minimize the potential adverse effects of closing the mine	<ul style="list-style-type: none">Class size for elementary/secondary school per communitySchool District #91 enrollment numbersEnrollment at post-secondary institutions and headcount totals, per communityChange in demand for educational services as experienced by School Districts, and College of New Caledonia (both CLC members) and UNBCNumber of Project-related delivery of training (number, type of training, and participation by community; BW Gold and Contractors)BW Gold participation in job fairs and employment-related eventsNumber of engagements and meetings related to closure planning, per community and/or with CLC	<ul style="list-style-type: none">BC Ministry of EducationSchool District #91, 28, 57, and 27CNCUNBCBW GoldContractorsCLC
		Operation	↑			
		Closure	↔			
	Change in demand for training programs and apprenticeship programs due to Project hiring	Operation	↑	<ul style="list-style-type: none">Work with training institutions to support or provide training programsSupport training of students from diverse groupsProvide scholarships to encourage high school graduation	<ul style="list-style-type: none">Number of Project apprentices – BW Gold and Contractors (including disaggregated data by gender and other indicators of diversity)Description of collaboration with education facilities, per communityTotal hours and type of BW Gold on-the-job training/ job-specific training (disaggregated by gender and other indicators of diversity)Number and dollar amount of scholarships (disaggregated by gender of recipient and other indicators of diversity)Number of jobs and FTEs for Project employees/ contractors (disaggregated by gender, Aboriginal membership, and other indicators of diversity or vulnerability); total hours and percentage of total hours worked by each group	<ul style="list-style-type: none">BW GoldContractorsITA

¹⁷ Data collection will focus on those communities that are anticipated to experience socio-economic effects of the Project (i.e., Vanderhoof, Prince George, Fraser Lake, Burns Lake, Fort St James, and Quesnel, and the Indigenous communities of UFN, LDN, StFN, SFN, NWFN, and NFN; Section 1.1). In the case that additional communities identify potential effects of the Project, the indicators and data sources will be adjusted to permit monitoring of those communities. These adjustments will occur within the adaptive management process.

Category	Monitored Effect	Phase(s)	Anticipated Effect Direction or Trend	Mitigation Measure	Monitored Indicators ¹⁷	Source
Regional and Community Services (Health Services)	Change in demand for health services due to Project workforce and their families	Construction	↔	<ul style="list-style-type: none">■ Provide self-contained camp to accommodate workers (this will work to offset Project's demands for health services)■ Provide on-site nurse and emergency services, and develop and implement a medical protocol to meet the workforce's urgent and non-urgent health care needs■ Provide Employee Assistance Program■ Work with local service providers and communities to develop a mine Closure Plan that identifies strategies and actions to minimize the potential adverse effects of closing the mine	<ul style="list-style-type: none">■ Capacity of emergency services in primary communities (e.g., ICU beds, ambulance capacity)■ Number of times public health care services were accessed per community, total and by key service category■ Number of times health care emergency services were accessed by the Project, per provider/per community■ Statistics on communicable disease rates by community or aggregate (e.g., instances of HIV/AIDS, Hep C, Gonorrhea, Chlamydia and Syphilis)*■ Number of non-local project workers that are being referred to local health facilities (for 1) urgent/non-urgent and 2) occupational/non-occupational demands) *■ Aggregated data on type and number of medical visits to on-site medical facilities*■ Information on the level and types of health services that are available on-site■ Number of Diagnostic and Treatment Centre and/or Emergency Room visits by non-residents, to understand cumulative effects of shadow populations*■ Number of Project workers referred to the local healthcare system, by key service category/diagnostic type■ Level of use of Employee Assistance Program (disaggregated by gender or other indicators of diversity)■ Site-management of injuries and accidents■ Number of engagements and meetings related to closure planning	<ul style="list-style-type: none">■ Northern Health (CLC)■ BW Gold■ Contractors
		Operation	↔			
		Closure	↔			
	Project-related traffic or worksite incidents resulting in changes in the demand for health services	Construction	↑	<ul style="list-style-type: none">■ Provide on-site nurse and emergency services, and develop and implement a medical protocol to meet the workforce's urgent and non-urgent health care needs■ Promote harassment-free workplace to its employees and maintain zero-tolerance alcohol and drug policy on-site and in camp at any time; participation in training, recognition by other employees and violations will be tracked; violations will not be tolerated■ Require a medical exam and a drug test for all new employees; random drug testing may also be conducted on site, as required.■ Provide at the site health and medical equipment and personnel to meet the requirements of the "Health, Safety and Reclamation Code for Mines in British Columbia" and Work Safe BC■ Work with local service providers to address changes in demand for health services	<ul style="list-style-type: none">■ Motor Vehicle Accident Data■ Number of times health care emergency services were accessed by the Project■ Police-Reported Crash Data (TAS)■ ICBC-Reported Crash Data■ Number of crew chats or rollout of health-related policies	<ul style="list-style-type: none">■ Insurance Corporation of British Columbia (ICBC)■ BW Gold■ Contractors■ BC Ministry of Justice■ Northern Health (CLC)
		Operation	↑			
		Closure	↔			
Regional and Community Services (Protective Services)	Change in demand for protective services as a result of Project-related transient workforce or in--migration	Construction	↑	<ul style="list-style-type: none">■ Focus recruitment and hiring efforts on primary communities■ Provide self-contained camp to accommodate workers■ Promote harassment-free workplace to its employees and maintain zero-tolerance alcohol and drug policy on-site and in camp at any time; participation in training, recognition by other employees and violations will be tracked; violations will not be tolerated■ Work with local service providers and communities to develop a mine Closure Plan that identifies strategies and actions to help minimize the potential adverse effects of closing the mine	<ul style="list-style-type: none">■ BC policing jurisdiction crime trends, per community■ Number of criminal code offences, per community■ Total crime rate, per community■ Number of violent offences, per community■ Number of engagements and meetings related to closure planning per community and/or CLC	<ul style="list-style-type: none">■ BC Ministry of Justice
		Operation	↑			
		Closure	↔			

Category	Monitored Effect	Phase(s)	Anticipated Effect Direction or Trend	Mitigation Measure	Monitored Indicators ¹⁷	Source
Regional and Community Services (Protective Services)	Project-related traffic and worksite incidents change demand for protective services	Construction	↑	<ul style="list-style-type: none">■ Work with NH, local fire departments, RCMP, and BC Ambulance to ensure that the appropriate information on the changes in area transportation volumes, mine operations, and the change to the local population are considered■ Provide firefighting equipment and trained personnel to meet all onsite fire and rescue needs■ Provide at the mine site trained mine rescue personnel and mine rescue equipment as well as onsite security	<ul style="list-style-type: none">■ Police-Reported Crash Data (TAS)■ Number and type of health and safety incidents on site■ Number of times emergency services were accessed by the Project, per community■ Number of engagements and meetings with emergency services providers and NH regarding the Project	<ul style="list-style-type: none">■ BC Ministry of Justice■ BW Gold■ Contractors■ RCMP
		Operation	↑			
		Closure	↔			
Regional and Community Services (Social Services)	Change in demand for social services due to Project workforce and their families	Construction	↔	<ul style="list-style-type: none">■ Focus recruitment and hiring efforts on primary communities■ Promote harassment-free workplace to its employees and maintain zero-tolerance alcohol and drug policy on-site and in camp at any time; participation in training, recognition by other employees and violations will be tracked; violations will not be tolerated■ Provide Employee Assistance Program■ Implement measures to facilitate a respectful workplace and safety and security of employees; focus on multi-cultural workforce considerations and provide Aboriginal cultural awareness training delivered to all new employees (e.g., training completed during first week of employment and ongoing through crew talks)■ Work with local service providers and communities to develop a mine Closure Plan that identifies strategies and actions to help minimize the potential adverse effects of closing the mine	<ul style="list-style-type: none">■ Number of employees and family members that use counselling services at the Project (Employee Assistance Program) (disaggregated by gender and other indicators of diversity or vulnerability)■ Statistics on the use of social services, per community and per service■ Number of engagements and meetings related to closure planning per community and/or CLC	<ul style="list-style-type: none">■ BW Gold■ CLC Information Request Form
		Operation	↑			
		Closure	↔			
Family and Community Well-being	Project-related employment reduces economic hardship of families in local communities	Construction	↓	<ul style="list-style-type: none">■ Focus recruitment and hiring efforts on primary communities	<ul style="list-style-type: none">■ Project employment per community (disaggregated by gender and other indicators of diversity or vulnerability)■ Total and average income paid to Project employees/contractors (disaggregated by gender and other indicators of diversity or vulnerability)■ Average and median income¹⁸	<ul style="list-style-type: none">■ BW Gold■ BC Data Catalogue
		Operation	↓			
	Changes to family and community well-being for employees from local communities as a result of poor income spending decisions	Construction	↓	<ul style="list-style-type: none">■ Deposit workers' salaries in their bank accounts and provide access to financial literacy training (Employee Assistance Program)■ Provide an Employee Assistance Program (this will include counselling services)■ Offer reasonably short shift rotations to minimize separation from family (14 days on and 14 off) and allow flexibility to accommodate hard to fill positions■ Ensure phone and Internet services are available to enable employees to communicate with their families	<ul style="list-style-type: none">■ Total and average income paid to Project employees/contractors (disaggregated by gender and other indicators of diversity or vulnerability)■ Average and median income■ Statistics on most accessed Employee Assistance Program services	<ul style="list-style-type: none">■ BW Gold■ BC Data Catalogue
		Operation	↓			
	Changes to inequality of employment and income as a result of Project employment and training	Construction	NA	<ul style="list-style-type: none">■ Focus recruitment and hiring efforts on primary communities■ Implement a hiring strategy that will focus on training workers from diverse groups■ Work with Aboriginal Groups to identify and remove barriers to employment and training	<ul style="list-style-type: none">■ Total and average income paid to Project employees/contractors (disaggregated by gender and other indicators of diversity or vulnerability)■ Average and median income	<ul style="list-style-type: none">■ BW Gold■ BC Data Catalogue
		Operation	NA			

¹⁸ Average income for communities anticipated to be affected by the Project (i.e., Vanderhoof, Prince George, Fraser Lake, Burns Lake, Fort St James, and Quesnel, and the Indigenous communities of UFN, LDN, StFN, SFN, NWFN, and NFN).

Category	Monitored Effect	Phase(s)	Anticipated Effect Direction or Trend	Mitigation Measure	Monitored Indicators ¹⁷	Source
Family and Community Well-being	Change in family health and wellbeing (e.g., sense of security) due to Project-related transient population engaging in socially disruptive or illegal activities	Construction	↓	<ul style="list-style-type: none">■ Provide a self-contained camp to accommodate workers (this will help to minimize the influx of workers to communities)■ Provide an Employee Assistance Program (this will include counselling services)■ Provide Aboriginal cultural awareness training delivered to all new employees (e.g., training completed during first week of employment and ongoing through crew talks)■ Require BW Gold managers/supervisor to receive cultural awareness training that also teaches them how to address and resolve issues if they arise■ Provide micro-aggression training to all new employees, and on an as-needed basis to promote harassment-free workplace■ Engage with stakeholders to identify community needs and priorities for social investment that focus on respecting community values■ Collaborate and partner with stakeholders to mitigate and avoid social impacts■ Implement feedback mechanism	<ul style="list-style-type: none">■ BC policing jurisdiction crime trends, per community■ Number of drug offences■ Number of vehicle theft offences, per community■ Number of property offences, per community■ Community Well-being index■ Feedback and comments, and discussion by CLC members pertaining to mental health changes in primary communities	<ul style="list-style-type: none">■ BC Ministry of Justice■ Government of Canada's Community Well-being index■ BW Gold■ CLC
		Operation	↓			
	Change in family relationships of Project employees in local communities due to work rotation/schedule	Construction	↓	<ul style="list-style-type: none">■ Offer reasonably short shift rotations to minimize separation from family (e.g., 14 days on and 14 off) and allow flexibility to accommodate hard-to-fill positions■ Ensure phone and Internet services are available to enable employees to communicate with their families■ Provide an Employee Assistance Program (this will include counselling services)■ Engage with stakeholder to identify community needs and priorities for social investment that focus on respecting community values■ Collaborate and partner with stakeholders to mitigate and avoid social impacts■ Implement feedback mechanism	<ul style="list-style-type: none">■ Number of employees and family members that use counselling services at the Project (Employee Assistance Program) (disaggregated by gender and other indicators of diversity or vulnerability)■ Statistics on most accessed Employee Assistance Program services■ Number of employees that resign due to family reasons (disaggregated by gender and other indicators of diversity or vulnerability)■ Project turnover rates (disaggregated by gender and other indicators of diversity or vulnerability)	<ul style="list-style-type: none">■ BW Gold
		Operation	↓			
	Change in employment and income	Closure	↓	<ul style="list-style-type: none">■ Implement a Workforce Transition Plan■ Work with local service providers and communities to develop a mine Closure Plan that identifies strategies and actions to help minimize the potential adverse effects of closing the mine■ Work with training institutions to support or provide training programs	<ul style="list-style-type: none">■ Number of jobs and FTEs for Project employees/contractors (disaggregated by gender, Aboriginal membership, and other indicators of diversity or vulnerability)■ Total and average income paid to Project employees/contractors (disaggregated by gender and other indicators of diversity or vulnerability)■ Number of engagements and meetings related to closure planning	<ul style="list-style-type: none">■ BW Gold

* Data for indicators marked with an asterisk (*) will be provided by Northern Health.

10.4 Approach to Impact Monitoring

The discussion of each Project impact will be described for impact prediction, data, and interpretation, as described below.

Impact Prediction

This section will state the predicted impact as identified in the Application/EIS (and demonstrated in the “anticipated trend” column of Table 10.1-1).

Data

This section will describe the relevant data for the predicted impact. The data will be updated annually, if available, to understand changes in conditions and identify trends. Quantitative data includes numbers (counts), values, and rates. In some cases, only qualitative information might be available. Qualitative data may include reports and observations from BW Gold or/and CLC, and local service providers regarding activities and events in local communities. Specific analyses will be considered based on each data set, with the goal of removing the influence of outliers and focusing on meaningful trends and patterns for those communities anticipated to be affected by the Project.

Tables, charts or graphs will be used to visualize data and identify and compare changes over time.

Interpretation

The interpretation will provide remarks on the “the impact prediction” in consideration of “the data”. Where possible and appropriate, this section will identify potential or probable links between changes or impacts to a community and data related to Project activities to determine the potential for a cause-and-effect relationship. While correlation and causation may not always be clear, BW Gold is committed to objective identification and assessment of potential interactions. Relevant industry averages and comparative analysis will be applied where appropriate to cross-analyse Project impacts with the impacts of similar developments to understand how the BW Gold Project fares compared to other projects or industry standards/averages.

11. ENGAGEMENT AND COMMUNITY FEEDBACK MECHANISM

BW Gold will communicate and engage with communities throughout the Project. Public communications, engagement with Aboriginal Groups and tenure holders will be supported by engagement plans – i.e., Aboriginal Group Engagement Plan (EAC Condition 16); Tenure Holder Communication and Mitigation Plan and Report (EAC Condition 38); and Public Communications (EAC Condition 42).

This section outlines the approach that BW Gold will take to communicate to Aboriginal Groups, land users, and tenure holders on the potential impact of Project activities on their use and enjoyment of recreational areas or other land use areas in the vicinity of the Project.

This section also describes the Project's public feedback mechanism and process for responding to complaints. The complaints response process has been developed in consideration of best practice and aims to provide confidence for users that their complaints will be reviewed in a timely manner and that a predictable resolution process is in place.

11.1 Communications Regarding Changes to Land User Experience

It is anticipated that certain activities, such as employee transportation/bussing activities along FSRs, construction noises, and blasting during operations, may change the experience of land users in the vicinity of the Project and along transportation routes. Defined transportation routes will be used, to the extent possible,¹⁹ and will be publicly disclosed so that land and road users are aware of the Project's transportation activities. BW Gold is committed to implement measures to minimize noise and vibration and visual effects of the Project, for example as described in the Noise and Vibration Effects Monitoring and Mitigation Plan (NVMP; EAC Condition 21).

BW Gold will communicate with land users regarding Project activities in advance of their occurrence. The need for notification about potential disruptions will be based on the area where noise from the Project is expected, as defined in the NVMP (EAC Condition 21). Table 11.1-1 describes BW Gold's approach to communication about activities that may impact land use activities.

Table 11.1-1: Communication Regarding Changes to Land Use Experience

Measure	Construction	Operation	Closure
Notification (e.g., by letter, phone call or text message) to registered tenure holders, Aboriginal Groups and stakeholders who have registered on the Project's email-or-SMS system (EAC Condition 42), at least 30 days before the planned activity. Notification will include description of the extent, duration, and anticipated disturbance, as well as BW Gold contact information in case of questions.	✓	✓	
Provision of a schedule and maps where Project activities will take place disturbing land or reducing enjoyment of land use on the Project's website (EAC Condition 42), and will be posted at least 30 days prior to the planned activities.	✓	✓	✓
Promotion and implementation of the Community Feedback Mechanism.	✓	✓	✓

¹⁹ Changes to the route may be required, for example, in the case of road construction or a traffic accident, unrelated to the Project.

BW Gold will continue to document communication, consultation and engagement using StakeTracker (or similar database), and these engagement records will be reviewed to identify trends or emerging issues related to reduced enjoyment of land uses in the vicinity of the Project.

11.2 Community Feedback Mechanism

BW Gold recognizes that the Project may result in real or perceived adverse effects to communities, land and road users in the vicinity of Project activities. This section describes a feedback mechanism to manage feedback and complaints about the Project. The Community Feedback Mechanism has been prepared with consideration of best practices for the mining industry, as defined by corporate and institutional guidance documents including the UN Guiding Principles on Business and Human Rights principles related to Access to Remedy. This Community Feedback Mechanism can be used by community members, employees, and contractors.

BW Gold will promote its feedback mechanism on the Project website (EAC Condition 42) and in local papers. BW Gold will work with municipalities and regional districts to promote the feedback mechanism. BW Gold will also raise awareness about the mechanism through communications and engagement activities. BW Gold's will receive feedback via the following formats:

- Face-to-face or submission of a feedback form at the Community Office in Vanderhoof (including anonymous option);
- Online feedback form on the Project's website (EAC Condition 42; including anonymous option);
- Feedback form and box at the Project site (including anonymous option); and
- Phone, email, or mail.

A Feedback Form (Appendix E) outlines the information that will be collected by BW Gold. Anonymous feedback will be considered by the Project and this input will be included in reporting process, although no response will be possible due to the anonymity of the submission. Confidentiality will be maintained, as all complaints will receive an identification number, which will be referenced during any investigation in order to protect the identity of any individual or group. BW Gold will take all reasonable steps to protect parties that submit feedback from retribution.

The feedback mechanism provides a process for BW Gold to understand issues that are, or are likely to be, risks or opportunities for BW Gold or the Project. Feedback and complaints may also support the adaptation of existing mitigations or development of new measures to reduce social or economic impacts and resolve issues before they escalate. Feedback and complaints may also provide insight into the understanding of monitored effects.

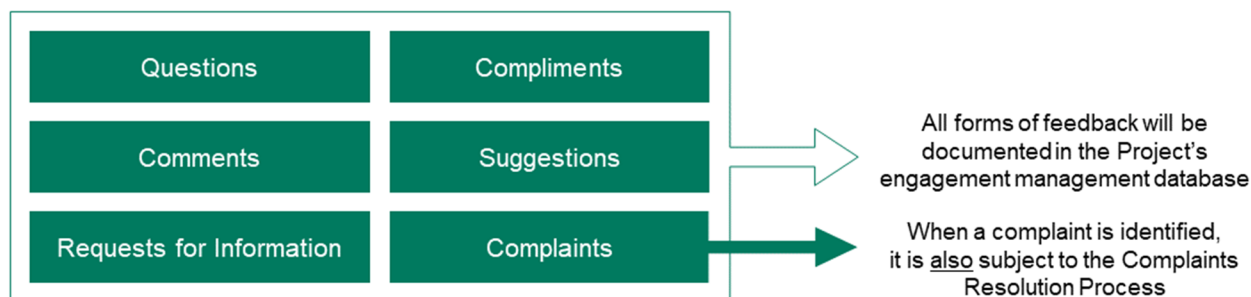
The Community Feedback Mechanism, together with feedback and ongoing CLC engagement, will identify other potentially affected communities that should be included in future CEMMP monitoring and annual reporting.

11.2.1 Feedback and Complaints Categorization and Management

Feedback includes comments, suggestions, compliments, questions or complaints about the Project or Project-related activities. All feedback will be documented in StakeTracker (or similar database; Figure 11.2-1) and reasonable efforts will be made to respond in a timely manner to questions, suggestions, compliments and comments²⁰.

²⁰ No response can be provided to anonymous submissions.

Figure 11.2-1: Blackwater Project Feedback Management Process



Complaints can result from real or perceived impacts of any of the Project. Table 11.2-1 identifies how complaints will be categorized and prioritized.

Table 11.2-1: Categorization of Complaints

Category	Criteria
Low Priority	<ul style="list-style-type: none"> ■ Short-term impact (i.e., up to 6 months) and no or low measurable alteration of quality of life ■ Impact that affects any one individual, one family unit, or one community ■ Potential public interest is low
Moderate Priority	<ul style="list-style-type: none"> ■ Medium-term (i.e., up to 2 years) impact that occurs intermittently during that period ■ Short-term and a measurable alteration of quality of life for more than ten (10) and less than 100 individuals or one (1) community, (e.g., traffic delay lasting more than 30 minutes) ■ Potential public interest is possible
Urgent / High Priority	<ul style="list-style-type: none"> ■ Long-term impact (i.e., more than 2 years) ■ Short-term and a measurable alteration of quality of life for more than 100 individuals or two (2) or more communities, (e.g., traffic delay lasting more than 30 minutes) ■ Impact may result in substantial public interest, or financial or business risk to BW Gold ■ Examples of urgent or high priority complaints are: <ul style="list-style-type: none"> ○ Noise and dust complaints, in accordance the federal Decision Statement 6.3 pertaining to dust and noise management ○ Repeated complaint or negative feedback ○ Widespread complaint/impact on more than 1 community ○ Breach of law, permit requirement, company policy or human right impact ○ Cause of harm, illness, injury, or fatality ○ Cause of property damage

Complaints about the Project will be treated seriously, and BW Gold will aim to resolve all complaints within 30 days, per the timeline described in Section 11.2.2.

11.2.2 Complaints Resolution Process

The complaints resolution steps and timeline are described in Table 11.2-2. All steps of the feedback mechanism will be documented.

Table 11.2-2: Complaints Resolution Process and Timeline

Step	Target Timeline	Process Description
Step 1: Complaint Registration	Within 2 days of receipt of complaint	<ul style="list-style-type: none"> Register complaints in StakeTracker or another software within this target timeline. <p>High priority or urgent complaints should be documented immediately to support a time-sensitive investigation and resolution process. Efforts will be made to acknowledge (Step 2) the complaints within this 2-day period in order that complainants recognize the issue has been received and is being investigated and addressed as described in this process.</p> <p>In accordance with the federal Decision Statement 6.3, BW Gold will respond to noise or dust complaint(s) within 2 days (48 hours of the complaint being received).</p>
Step 2: Acknowledgement	By day 5	<ul style="list-style-type: none"> Acknowledge all complaints within 5 days of receipt, provided contact information has been provided. <p>The acknowledgement will provide information about the resolution process and timelines. A meeting may be proposed, pending the level of detail provided in the complaint.</p> <p>In the case of anonymous submissions, BW Gold will record the complaint and undertake an assessment and investigation, to the extent possible based on the information provided. While no resolution will be shared with the complainant, BW Gold will record and publicly report on resolution of anonymous complaints.</p>
Step 3: Assessment	By day 7	<ul style="list-style-type: none"> Assess priority of the complaints according to its urgency (i.e., minor, moderate, major). Determine whether any additional information is needed. Recommend processes to respond or address the issue. Direct concern resolution to appropriate department/manager.
Step 4: Investigation	By day 21	<ul style="list-style-type: none"> Investigate the complaint by designated personnel who consult involved/relevant parties and consider any resolution suggested by the complainant. Provide the complainant with regular updates (verbally or written) on the investigation. Prepare a written investigation report to document the findings.
Step 5: Resolution Communication	By day 25	<ul style="list-style-type: none"> If possible, develop a resolution in collaboration with the complainant. Aim to address at least 90% of registered complaints within this target timeline and provide resolution to the complainant. Resolution can include clarification of a procedure or commitment to introduce improvements or mitigation measures. If specific or complicated issues require more time to be addressed, set and communicate the process going forward and new potential target timelines with the complainant. If the complainant is not satisfied with the proposed resolution, escalate the process with the responsible department to identify alternate resolutions. This may involve meetings between the complainant and department to share information and seek further understanding.

Step	Target Timeline	Process Description
Step 6: Follow-up	By day 30 or day set/communicated during the process	<ul style="list-style-type: none"> ■ If resolution has been agreed upon, monitor outcomes through follow up calls, meetings or written input from the complainant. ■ Close the complaint when remedial actions have been completed by the BW Gold Project, and the complainant signs-off on the outcome of the resolution. ■ Conduct a root cause analysis, particularly for high priority or urgent complaints to inform an internal corrective action process (which will include contractors, as necessary).

11.2.3 Feedback Review and Reporting

BW Gold will review all feedback received on the Project regularly, and complaints will be processed in accordance with the Complaints Resolution Process and Timeline.

Monthly feedback and complaints summary reports will be prepared for internal review by the Mine Manager and Environmental Manager. These reports will support BW Gold's understanding of issues or emerging risks to the Project or local communities and will provide insight on the effectiveness of mitigation measures or the need for adaptive management.

In alignment with CLC meetings (as described in Appendix B), BW Gold will prepare a summary of feedback, complaints and their resolutions in order that CLC members are aware of the level of use of the mechanism, key topics garnering interest or concern by communities, and the number of complaints and their resolution status. A summary of feedback will also be provided in the CEMMP Annual Report (Appendix D). Information shared with the CLC may be presented verbally or in written format. BW Gold will present the information in such a way that confidential or identifying information is not be shared.

12. REPORTING, DATA MANAGEMENT, AND RECORD KEEPING

12.1 Environmental Assessment Certificate

Condition 5 of the EAC sets out 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 EAO, Aboriginal Groups, and the CLC, within the timelines specified in Condition 5. The reports will report on status of compliance with the Project's EAC.

12.2 Annual CEMMP Reporting

The annual CEMMP Report (CEMMP-R) will be prepared by an independent Qualified Person, who will be involved in data collection, interpretation, analysis, and reporting. The CEMMP-R will be prepared during construction, operation and active closure, and in case of temporary care and maintenance.

The CEMMP-R will present annually the impact predictions, data and interpretation (as described in Section 7.4). The CEMMP-R will also summarize qualitative information obtained from CLC members such as advice and input from ongoing CLC meetings, and from CEMMP-related interviews.

The CEMMP-R will summarize engagement related to land user enjoyment during the calendar year. Feedback and complaints received through the feedback mechanism (Section 11.2) will be summarized, and quantitative or qualitative data and feedback on the Project will be highlighted in the case it further contextualizes BW Gold's understanding of social or economic effects of the Project. The CEMMP-R will conclude with information about the effectiveness of implemented mitigation and proposed adaptive measures, as needed. The CEMMP-R will use tables, graphs, charts and infographics to help visualize conditions and trends in relevant indicators. A draft Table of Content of the CEMMP-R is provided in Appendix D.

A draft CEMMP-R will be provided to the CLC for review.

The final annual CEMMP-R will be available to the public on the Project's website (EAC Condition 42).

12.3 Data Management

BW Gold will maintain records related to community effects monitoring using StakeTracker and/or database management suitable for the Project. Data will be entered in a standardized format and program that will allow for comparison between years. Monitoring data will be stored for the life of mine.

13. EVALUATION AND ADAPTIVE MANAGEMENT

The CEMMP will be updated to incorporate CLC input and any changes to the monitoring program that results in changes to mitigation measures and indicators.

CEMMP implementation (i.e., monitoring of impacts, analysis of results, and evaluation of effectiveness of mitigation measures) will be undertaken by a Qualified Person and in cooperation with the CLC, as described in EAC Condition 37. As part of the CEMMP implementation, evaluation and review will occur following the submission of the first CEMMP-R and annually thereafter, or in response to adaptive management triggers (Section 2.3.5).

The evaluation and adaptive management process by a Qualified Person will include the review of the feedback mechanism and complaints response process. The intent of this evaluation will be to understand the effectiveness of the mechanism at responding to issues, addressing complaints, and collecting feedback.

Table 13.1-1 identifies qualitative triggers to measure the level of change relative to socio-economic data and baseline conditions to determine whether mitigation measures need to be altered or additional mitigation measures implemented.

Table 13.1-1: Adaptive Management Triggers

Monitoring Result	Management Response
No effect	No action <ul style="list-style-type: none"> ■ Continue monitoring program. ■ No change to mitigation measures.
Low level effect <ul style="list-style-type: none"> ■ A trend / effect has been identified and aligned with the predictions of the Application/EIS (New Gold 2015).²¹ ■ No negative feedback has been received pertaining to Project activities that may influence the socio-economic condition or be related to the negative effect. 	Low level action <ul style="list-style-type: none"> ■ Inform CLC and Aboriginal Groups. ■ Continue monitoring program. ■ Identify new mitigation measures and discuss as recommendations in monitoring report.
Medium level effect <ul style="list-style-type: none"> ■ An adverse effect has been observed and is aligned with the predictions of the Application/EIS (New Gold 2015). ■ The Project is or is perceived to be impacting a segment of the population that is considered to be vulnerable (e.g., youth, women, minorities, members of Aboriginal Groups). ■ BW Gold has received up to five (5) complaints (directly or through the CLC) pertaining to Project activities that may correlate to the negative effect. 	Medium level action <ul style="list-style-type: none"> ■ Inform CLC and Aboriginal Groups through meeting and reporting schedules (as defined in Sections 3.3 and 3.6 of the CLC Terms of Reference, Appendix B). ■ Continue monitoring program. ■ Evaluate if new mitigation measures are necessary, and discuss these measures with CLC and Aboriginal Groups. ■ Implement new mitigation measures if necessary.
High level effect <ul style="list-style-type: none"> ■ There is an adverse socio-economic effect and is beyond the predictions of the Application/EIS (New Gold 2015). ■ The Project is or is perceived to be impacting more than one segment of the population that is considered to be vulnerable (e.g., youth, women, minorities). ■ BW Gold has received more than six (6) complaints (directly or through the CLC) pertaining to Project activities that may correlate to the negative effect. 	High level action <ul style="list-style-type: none"> ■ Immediately notify CLC and Aboriginal Groups listed in the federal Decision Statement. ■ Evaluate if changes are required to monitoring program. ■ Identify new mitigation measures and discuss these new measures with the CLC and Aboriginal Groups. ■ Implement new mitigation measures.

²¹ Volume 5, Section 7.3 of the Application/EIS, 2015.

14. PLAN REVISION

The CEMMP will be revised to include changes in mitigation or monitoring methods and implementation, including adaptive management actions.

14.1 Notification and Consultation Required upon Plan Revision

A summary of collaborations and engagement efforts pertaining to the work on this document is as follows:

- A draft of the plan was provided to Aboriginal Groups and the Project's CLC for review, revisions, and comments on October 14, 2021; an Issue Tracking Table (ITT) was also provided at that time. The email explained comment submission logistics and requested comments by November 15, 2021.
- On December 9, 2021, the CLC met virtually to discuss the CEMMP and solicit additional input. It was noted during the call that comments had been received from Northern Health (NH), UFN, LDN, and the City of Quesnel. The District of Fort St James confirmed it had no comments on the CEMMP.
- On December 30, 2021 the CLC members and Aboriginal Groups received a revised CEMMP from BW Gold, including a submission letter, as well as an Issue Tracking Table (ITT) which included comments on the Plan and how the comments were considered and evaluated by BW Gold for inclusion in the Plan. The ITT also contained responses describing how the draft Plan was revised based on the consultation that occurred during developing the Plan.
- February 23, 2022 meeting with the CLC included continued discussion on the CEMMP and CEMMP baseline data collection.

To date, comments from NH, District of Fort St James, and BC EAO were received regarding the draft CEMMP via email and other communications (e.g., phone calls, meetings). All comments and feedback have been tracked in the ITT, with responses prepared by the Qualified Person or BW Gold and provided to the relevant parties via email from BW Gold. Collection, tracking and responding to comments and feedback on this CEMMP continued throughout the drafting and finalization phase of this document. The majority of suggested revisions were incorporated into this plan; for revisions not incorporated into this Plan, a response was provided in the ITT explaining why the suggested revision could not be incorporated.

15. QUALIFIED PERSONS

The CEMMP and Terms of Reference, and any amendments thereto, must be implemented to the satisfaction of the Qualified Person throughout Construction, Operations, and for the first five years of Closure, and to the satisfaction of the EAO.

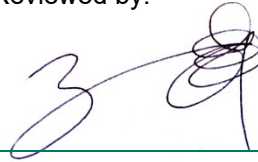
This management plan has been prepared and reviewed by the following Qualified Persons:

Prepared by:



Klaudia Sieminska, MA
Senior Consultant

Reviewed by:



Zoe Mullard, MASc
Principal Consultant

16. REFERENCES

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

Legislation

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.

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AMEC. 2013b. *Blackwater Gold Project Application for an Environmental Assessment Certificate / Environmental Impact Statement. Assessment of Potential Social Effects. Appendix 7.1.1A Social 2013 Baseline Report.*

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APPENDIX A CONCORDANCE TABLE WITH ENVIRONMENTAL ASSESSMENT CERTIFICATE #M19-01 (JUNE 21, 2019)

Appendix A: Concordance Table with Environmental Assessment Certificate #M19-01 (June 2019)

Condition	Requirement	Location in Plan
Condition 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 (Purpose and Objectives)
	b) roles and responsibilities of the Holder and Employees;	Section 3 (Roles and Responsibilities)
	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 15 (Qualified Persons)
	d) schedule for implementing the plan, program or other document throughout the relevant Project phases;	Section 12 (Reporting)
	e) means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness;	Section 10 (Socio-economic Impact Monitoring and Adaptive Management)
	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 12 (Reporting)
Condition 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:	Section 5 (Adaptive Management Framework) Section 10 (Socio-economic Impact Monitoring and Adaptive Management) Section 12 (Reporting)
	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.	
	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;	
	e) the baseline information that will be used, or collected where existing baseline information is insufficient, to support the monitoring program;	

Condition	Requirement	Location in Plan
	<p>f) the scope, content and frequency of reporting of the monitoring results;</p> <p>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;</p> <p>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;</p> <p>i) a description of the process for and timing to alter existing mitigation measures or develop new mitigation measures to reduce or avoid effects;</p> <p>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;</p> <p>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,</p> <p>l) the scope, content and frequency of reporting on the implementation of altered or new mitigation measures.</p> <p>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.</p>	
Condition 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; 	Draft CEMMP provided to CLC and Aboriginal Groups on 1 Oct 2021; On December 9, 2021, the CLC met virtually to discuss the CEMMP; Section 2 (Purpose and Objectives)

Condition	Requirement	Location in Plan
	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);	Comments were received from NH, LDN/UFN and the City of Quesnel. Input has been incorporated into the revised plan, as noted in Sections 2 and 14.
	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;	BW Gold followed up with the parties consulted on the plan to indicate how their comments were considered
	d) maintain a record of consultation with each such party regarding the plan, program or other document; and	BW Gold is maintaining consultation records
	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.	BW Gold will provide consultation records to the EAO upon request
Condition 37 (Community Effects Monitoring and Management Plan)	<p>The Holder must establish and maintain a Community Liaison Committee (CLC). The purpose of the CLC is to provide information to the Holder on effects from the Project in the members' communities, to provide advice to the Holder on mitigation measures to address social and economic effects, and review and comment on the CEMMP and the plan's implementation.</p> <p>a) the Holder must develop a Terms of Reference for the CLC in consultation with the District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, NHA and the EAO. The Terms of Reference must include at least the following:</p> <ul style="list-style-type: none"> i) the communities or organizations that will be invited to be members of the CLC. This must include at least the following: District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, and NHA; the mechanisms by which the Holder will facilitate the effective participation of CLC members; ii) the frequency with which the CLC will be canvassed for agenda topics and the means by which the Holder will provide responses to CLC members on those proposed topics; iii) the frequency of meetings and the means by which the locations of meetings will be selected; iv) the means by which CLC members will be advised of the timing of and topics for proposed meetings; v) the means by which meeting records will be kept and meeting notes made publicly available; 	<p>CLC established in May 2021;</p> <p>Terms of Reference submitted 10 June 2021 to EAO and CLC members;</p> <p>28 July 2021 approved by Tracey James;</p> <p>6 August 2021 Final ToR sent to EAO to post on EPIC</p>

Condition	Requirement	Location in Plan
	<p>vi) the means by which other agencies or organizations whose mandates pertain to the topics potentially discussed by the CLC will be identified and invited to join discussions on those topics;</p> <p>vii) the means by which the CLC will coordinate with the EMC (Condition 19) where similar or related topics are being considered;</p> <p>viii) the means by which the Holder will provide and document responses to issues raised at the CLC;</p> <p>ix) the means by which the CLC will be asked to periodically review the implementation of the CEMMP; and</p> <p>x) an approach to periodically evaluate the effectiveness of the CLC;</p>	
	b) The Holder must retain one or more Qualified Persons to develop a CEMMP. The plan must be developed in consultation with the CLC. The Qualified Persons must each have a minimum of five years' relevant experience in the assessment and management of the social effects identified associated with major mines or industrial facilities. The CEMMP must include at least the following:	<p>Section 15 (Qualified Persons)</p> <p>Section 8 (Socio-economic Effects and Mitigation Measures)</p>
	i) identification of the communities likely to experience social or economic effects that are to be addressed in the plan;	Section 2 (Purpose and Objectives)
	ii) the means by which additional communities would be identified and included in the plan should effects from the Project extend to other communities in the future;	<p>Table 10.1-1 note 13 (Socio-economic Impact Monitoring and Adaptive Management)</p> <p>Section 11.2 (Community Feedback Mechanism)</p> <p>Section 12.2 (Annual CEMMP Reporting)</p>
	iii) a monitoring program for the following potential adverse effects from the Project on the communities identified in paragraphs b) i) and b) ii) related to:	Section 10, Table 10.1-1 (Socio-Economic Impact Monitoring and Adaptive Management)
	i. impacts on community services;	
	ii. impacts on population and demographics;	Section 10, Table 10.1-1 (Socio-Economic Impact Monitoring and Adaptive Management)
	iii. impacts on crime and socially disruptive behaviour; and	Section 10, Table 10.1-1 (Socio-Economic Impact Monitoring and Adaptive Management)

Condition	Requirement	Location in Plan
	iv. impacts on community and family well-being;	Section 10, Table 10.1-1 (Socio-Economic Impact Monitoring and Adaptive Management)
	iv) means by which the Holder will assess and mitigate potential adverse effects from the Project on Aboriginal Groups and sub-populations who may be more vulnerable to Project related adverse social impacts;	Table 5.1-1: Adaptive Management Triggers Section 10.3 (Data Sources and Collection) Table 10.1-1 Potential Effects and Indicators to Support Socio-Economic Effects Monitoring
	v) provision of housing for all Employees at camps at the Project Site during Construction and Operations while on shift;	Section 8.4 (Employee Accommodation, Transportation and Traffic Management)
	vi) provision of transportation for Employees to the Project Site by bus during Operations and bus and airplane to the Project Site during Construction and the means by which the Holder will restrict Employees from driving personal vehicles to the Project Site, except under limited and identified circumstances;	Section 8.4 (Employee Accommodation, Transportation and Traffic Management)
	vii) measures to facilitate hiring of Employees and service providers from the Socio-economic Regional Study Area defined in the Application and from Aboriginal Groups. These measures must include: i. skills training; and	Section 8.2 (Skills Training)
	ii. recruitment approaches to facilitate hiring of members of Aboriginal Groups and population groups who are typically underrepresented in mine employment;	Section 8.1 (Recruitment and Employment Measures)
	viii) measures to support Employees maintaining regular contact with their social networks while residing at the camps;	Section 8.3 (Employee Supports and Services)
	ix) measures to support Employees in managing personal finances and mental and physical health;	Table 8.3-1: Employee Supports and Services
	x) management of traffic along the Kluskus and Kluskus-Ootsa Forest Service Road, including how the Holder will seek and respond to concerns about road traffic from local communities and other road users;	Section 8.4 (Employee Accommodation, Transportation and Traffic Management)
	xi) means by which the Holder will reduce the effects on Employees and local communities when Operations cease on a temporary or permanent basis;	Section 9 (Temporary and Permanent Closure)

Condition	Requirement	Location in Plan
	xii) means by which the Holder will provide information to Aboriginal Groups, land users and tenure holders on the potential impact of Project activities on their use and enjoyment of an area affected by the Project and consider and address concerns raised by those individuals; and	Section 11 (Engagement and Feedback Mechanism)
	xiii) the process by which members of the public may submit feedback regarding the Project and the resolution process for any complaints received about the Project, including the timeframe and means by which the Holder will respond to the complaint, and how issues will be identified, tracked and responses documented.	Section 11 (Engagement and Feedback Mechanism)
	The Holder must provide the draft CLC terms of reference that was developed in consultation with the District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, NHA and the EAO to the EAO and proposed CLC members a minimum of 180 days prior to the planned commencement of Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.	CLC ToR: Submitted 10 June 2021 to EAO and CLC members; 28 July 2021 approved by Tracey James; 6 August 2021 Final ToR sent to EAO to post on EPIC (Appendix B)
	The Holder must provide the draft CEMMP that was developed in consultation with the CLC to the EAO and CLC members a minimum of 60 days prior to the planned commencement of Construction, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.	Draft CEMMP provided to CLC on 1 Oct 2021.
	The plan and terms of reference, and any amendments thereto, must be implemented to the satisfaction of a Qualified Person throughout Construction, Operations, and for the first five years of Closure, and to the satisfaction of the EAO.	Section 15 (Qualified Persons)

APPENDIX B COMMUNITY LIAISON COMMITTEE TERMS OF REFERENCE (MAY 2021)



Blackwater Gold Project

Community Liaison Committee Terms of Reference

April 2021
(Version 2.0)

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APPENDIX A SUMMARY OF CLC MEMBER COMMENTS ON TERMS OF REFERENCE

ACRONYMS AND ABBREVIATIONS

BC	British Columbia
BW Gold	BW Gold LTD.
CEMMP	Community Effects Monitoring and Management Plan
CLC	Community Liaison Committee
CNC	College of New Caledonia
DSP	Document Submission Plan
EAC	Environmental Assessment Certificate #M19-01 issued on June 21, 2019
EAO	British Columbia Environmental Assessment Office
EMC	Environmental Monitoring Committee
FOIPPA	<i>Freedom of Information and Protection of Privacy Act (1996)</i>
Indigenous Nations or Aboriginal Groups	Ulkatcho First Nation, Lhoosk'uz Dené Nation, Nadleh Whut'en First Nation, Stellat'en First Nation, Saik'uz First Nation and Nazko First Nation
NH	Northern Health
NEWSS	Nechako Environment Water Stewardship Society
ToR	Terms of Reference

1. BACKGROUND AND OBJECTIVES

The Blackwater Gold Project received Environmental Assessment Certificate #M19-01 (EAC) on June 21, 2019 under the 2002 *Environmental Assessment Act* and a Decision Statement on April 15, 2019 under the *Canadian Environmental Assessment Act, 2012* approving the Blackwater Project, with conditions. The Project is an open pit gold and silver mine with associated ore processing facilities located 110 kilometres southwest of Vanderhoof BC. The Project Proponent is BW Gold LTD (BW Gold).

Condition 37 of the EAC requires the establishment of a Community Liaison Committee (CLC).¹ The purpose of the CLC is to provide information to BW Gold on Project effects in members' communities, to provide advice to BW Gold on mitigation measures to address social and economic effects, and review and comment on the Community Effects Monitoring and Management Plan (CEMMP) and the plan's implementation.

As part of Condition 37, BW Gold is required to develop Terms of Reference (ToR) setting out the operating parameters of the CLC in consultation with the District of Vanderhoof, Village of Fraser Lake, Indigenous Nations, Northern Health Authority (NHA) and Environmental Assessment Office (EAO). The ToR Version 2.0 has been prepared to satisfy that requirement, including seeking and incorporating input from CLC members on this document.

BW Gold [New Gold] established a community liaison committee in 2012 to keep local government and community organizations (education, environmental and community services) apprised of Project activities. This committee's last meeting was in November 2020.

BW Gold hosted a virtual meeting with the CLC on January 13, 2021 to review and discuss the draft CLC ToR. The Ulkatcho First Nation, Lhoosk'uz Dené Nation, Village of Fraser Lake, City of Quesnel, District of Vanderhoof, Electoral Area I of Cariboo Regional District, Electoral Area F of Regional District Bulkley Nechako, Northern Health (NH), Nechako Environment and Water Stewardship Society (NEWSS), College of New Caledonia (CNC), and EAO participated in the meeting. Input received during this meeting, and in follow up emails and phone calls, has been incorporated into this version of the ToR (Version 2.0). Comments on Version 1.0 are summarized and responses provided in Table 1 of Appendix A.

¹ Condition 37 also requires the development of a Community Effects Monitoring and Management Plan (CEMMP), which will be a stand-alone plan and must be developed in consultation with the CLC.

2. COMPLIANCE OBLIGATIONS

Specific requirements for the CLC Terms of Reference under Condition 37 of the EAC are reproduced below.

The Terms of Reference must include at least the following:

- i. the communities or organizations that will be invited to be members of the CLC. This must include at least the following: District of Vanderhoof, Village of Fraser Lake, Aboriginal Groups, and NHA [Northern Health];*
- ii. the mechanisms by which the Holder will facilitate the effective participation of CLC members;*
- iii. the frequency with which the CLC will be canvassed for agenda topics and the means by which the Holder will provide responses to CLC members on those proposed topics;*
- iv. the frequency of meetings and the means by which the locations of meetings will be selected;*
- v. the means by which CLC members will be advised of the timing of and topics for proposed meetings;*
- vi. the means by which meeting records will be kept and meeting notes made publicly available;*
- vii. the means by which other agencies or organizations whose mandates pertain to the topics potentially discussed by the CLC will be identified and invited to join discussions on those topics;*
- viii. the means by which the CLC will coordinate with the EMC (Condition 19) where similar or related topics are being considered;*
- ix. the means by which the Holder will provide and document responses to issues raised at the CLC;*
- x. the means by which the CLC will be asked to periodically review the implementation of the CEMMP; and*
- xi. an approach to periodically evaluate the effectiveness of the CLC.*

3. TERMS OF REFERENCE

3.1 Committee Membership

In 2012, a community liaison committee was established during the Blackwater Project environmental assessment phase and it included representatives from the District of Vanderhoof, Village of Fraser Lake, Village of Burns Lake, District of Fort St. James, City of Quesnel, Regional District of Bulkley Nechako, Cariboo Regional District, Northern Health Authority (now named Northern Health), School District #91, College of New Caledonia, Connexus Community Resources, and NEWSS (the “Original Members”).

As referenced in Section 1 (Background and Objectives), Condition 37 of the EAC requires the establishment of a Community Liaison Committee for the purpose summarized in such section.

In accordance with Condition 37, the communities or organizations that will be invited to be members of the CLC will include at least: the District of Vanderhoof, Village of Fraser Lake, Indigenous Groups (including Ulkatcho First Nation, Lhoosk’uz Dené Nation, Nadleh Whut’en First Nation, Stellat’en First Nation, Saik’uz First Nation and Nazko First Nation).

To maintain continuity, Original Members will be invited to join the CLC. A membership list will be developed and circulated to members once the membership is confirmed. This approach meets the intent of Condition 37 which provides for other agencies and/or organizations to become committee members if their mandates align with topics to be discussed by the CLC.

Each member group will appoint its own representative to the CLC and may name one alternate to serve when a primary member is unavailable. Member groups may replace members and alternates appointed to the CLC at any time by giving written notice to the other groups.

In order to promote continuity and effective transfer of knowledge within the CLC, member appointments will be for three (3) years with the opportunity for reappointment to be decided by each member group. A member or alternate may resign from the CLC by notifying the Secretariat in writing. Should a member resign, the member group they represented will appoint a replacement.

BW Gold will maintain and update a record of members, including contact information, and distribute it to CLC members for their reference.

3.2 Roles and Responsibilities

3.2.1 *BW Gold*

BW Gold is ultimately accountable for the CLC as the EAC holder and will support the CLC by:

- providing a Secretariat to support the CLC as described in Section 3.2.4;
- facilitating outreach to other agencies or organizations whose mandates pertain to the topics being discussed by the CLC; and
- coordinating with the Environmental Monitoring Committee (EMC) Co-Chairs and Secretariat where similar or related topics are being discussed as described in Section 3.4.1.

3.2.2 *Committee Members*

The role of a CLC member is to support the purpose of the committee as a whole by providing information and advice to BW Gold relating to Project social and economic effects on local communities. Members may also advise the CLC within the mandate of their areas of expertise or government and organization.

Community Liaison Committee members must be willing to work together towards CLC objectives. To ensure the effective operation of the CLC, members will commit to participating actively in the work and discussion of the committee, and to giving other members adequate opportunities to express their views. The members commit to being engaged and responsive to the CLC initiative in a prompt and flexible manner. Should a primary member be unable to attend a meeting, the primary member will brief the alternate member to prepare them for the meeting.

3.2.3 Committee Co-Chair

Meetings of the CLC will be co-chaired by BW Gold and one other committee member. The overall responsibility of the Co-Chairs is to facilitate CLC meetings to ensure that the committee functions effectively and achieves its primary purposes. The Co-Chairs will participate in committee discussions to the same extent as any other member.

In January of each year, the CLC will solicit nominations from its membership to serve as Co-Chair during the following year.²

3.2.4 Committee Secretariat

The Secretariat will operate under the direction of the Co-Chairs and serve as the main point of contact for CLC members and will support the Co-Chairs and CLC by:

- managing Co-Chair rotations;
- maintaining a CLC calendar;
- notifying CLC members of meeting details;
- being responsible for meeting logistics;
- in January of each year, soliciting nominations from CLC members to serve as Co-Chair during the following year;³
- tracking actions arising from meetings;
- developing and distributing meeting agendas; and
- preparing meeting minutes and tracking comments and relevant action items / outcomes.

3.2.5 Alternates

The function of the alternate is to attend CLC meetings when the primary member is unavailable, so that each member group is represented at as many meetings as possible. If an alternate replaces a primary member at a meeting, the alternate will ensure the primary member is briefed as soon as possible on the business conducted at the meeting, including any decisions or recommendations by the CLC.

If alternates are identified by a CLC member they will receive notifications of meetings, meeting minutes, and any other committee-related documentation, and may choose to attend any CLC meeting; however, where the primary member is also in attendance, the alternate should participate as an observer only, and any costs for the alternate will not be borne by BW Gold. BW Gold will cover costs for CLC meetings as set out in Section 3.9.

² Nomination dates may vary in the first year, pending timing for acceptance the ToR.

³ As above.

3.2.6 Other Participants

The Secretariat may invite, at the direction of the Co-Chairs, other government agencies or organizations whose mandates pertain to an agenda topic(s) to provide specialized advice. The need to invite such government agencies or groups will be decided on an as-needed basis by the CLC depending on the topic being discussed. In the case that third party consultant services are required to support the CLC, BW Gold will be responsible for their compensation. The Co-Chairs will decide and approve on the third party consultants that may be required to support the CLC.

3.3 Meetings

The CLC will hold a minimum of two meetings per year, with allowance for special meetings to address additional topics that may arise. During the pre-construction and construction phases, the CLC anticipates meeting more than twice a year.

The meeting format will be determined by the Co-Chairs, and will typically be conducted by telephone or video conference to facilitate broad participation and reduce travel requirements. The Co-Chairs will determine if an in-person meeting is required. If in-person meetings are arranged, BW Gold will provide the venue for CLC meeting.

Certain events or topics, such as time-sensitive matters, may require the CLC to convene on short notice. Section 3.5.1 outlines the process to develop and distribute an urgent meeting agenda. Section 3.6 discusses documentation and reporting associated with urgent CLC meetings.

The CLC meetings will be conducted within the framework of an agenda developed as described in Section 3.5.1, and will comprise a structured discussion of one or more topics. The committee should endeavour to collaboratively reach consensus on recommendations for each topic. At the beginning of each meeting, the Co-Chairs will provide a recap of the prior meeting.

3.4 Communication and Coordination

The Secretariat will be the CLC's main point of contact for CLC communications. All member groups will make best efforts to respond to communications from other members or the secretariat within ten (10) business days of receiving a communication. Should the CLC identify that additional information is needed from BW Gold or one of the other member groups to carry out its responsibilities, the Secretariat will communicate a clear request for this information to the relevant member group, allowing five (5) business days for a response before any upcoming CLC meeting.

Meeting agendas (as described in Section 3.5.1) will be provided to CLC members, along with any materials for review to allow members to prepare and obtain technical advice if necessary. Where appropriate, materials must include a copyright disclaimer. Materials provided to the EAO are subject to the BC *Freedom of Information and Protection of Privacy Act* (FOIPPA).

3.4.1 Coordination with the Environmental Monitoring Committee

Condition 19 of the EAC requires the establishment of an EMC, which will facilitate information sharing and provide advice to BW Gold on the ongoing development and operation of the Project, and the implementation of EAC requirements. Where the CLC and EMC are considering related topics the CLC Secretariat will:

- Notify the EMC Secretariat to identify the topic of mutual interest and the CLC timing for discussing the topic; and
- Provide the EMC with a written summary of the CLC discussion and/or meeting minutes on the topic.

In the event the CLC or EMC are interested in meeting to discuss the topic, the CLC and EMC Co-Chairs will discuss the meeting request and decide whether to proceed with the meeting request. If agreed, the CLC and EMC Secretariats will arrange a special meeting to discuss the topic and to confirm a meeting agenda. Topics that are outside of the shared CLC and EMC mandates will not be considered.

3.4.2 *Community Effects Monitoring and Management Plan Implementation*

The CEMMP will be developed in consultation with the CLC and will periodically review the implementation of the CEMMP. The CLC will review the draft CEMMP as per the Document Submission Plan (DSP; Condition 10 of the EAC), which identifies the proposed dates or timelines for submission of plans, programs or other documents required by the EAC. The approach and timing of the review of the implementation of the CEMMP will be determined by the Co-Chairs.

3.5 Topics for Discussion

3.5.1 *Meeting Agenda Development and Distribution*

The Secretariat will canvas CLC members for possible meeting dates and agenda topics, a minimum of 20 business days in advance of a possible meeting date. Agenda topics must either be related to the purpose of the CLC or to the functioning of the CLC itself; topics that are outside of the CLC mandate will not be considered.

The meeting notice and draft meeting agenda will be distributed by the Secretariat to CLC members a minimum of ten (10) business days before the meeting (taking into consideration topics submitted by members, and any topics noted for follow-up discussion in previous meetings). When the draft agenda is circulated, the Secretariat will re-canvas members for any additional agenda topics. CLC members will provide the Secretariat with details of any topic they wish to raise at a CLC meeting within five (5) business days of receiving a draft agenda.

Based on input from CLC members, the Secretariat will develop the final agenda in consultation with the Co-Chairs. A finalized meeting agenda will be provided to CLC members a minimum of five (5) business days before the meeting or as otherwise agreed to by the CLC, along with any materials for review to allow members to prepare and obtain technical advice if necessary.

At the direction of the Co-Chairs, topics may be deferred to a future meeting if the agenda is full. The Secretariat will follow up with members who have suggested a topic(s) to advise them of the timing for discussing the topic or if a topic is outside the CLC mandate.

In the case of an urgent meeting, all reasonable efforts will be made by the Co-Chairs and Secretariat to distribute the agenda in advance of the meeting. These meetings will address only those agenda item(s) deemed to be urgent.

3.6 Documentation and Reporting

The Secretariat will circulate draft meeting minutes for review and approval of CLC members. Members will indicate their approval of meeting minutes to the Secretariat, with or without changes, within ten (10) business days of receiving the draft minutes. After ten (10) business days the meeting minutes will be finalized. If substantive changes to the minutes are required, the revised minutes will be distributed to the members for re-approval, and the Secretariat may elect to provide additional review time. If a CLC member requires additional time to review the draft meeting minutes, upon receipt of the draft minutes, the CLC member will notify the Secretariat and a five (5) business day extension will be granted.

In the case of an urgent CLC meeting, the Secretariat will make best efforts to circulate meeting minutes to CLC members within three (3) business days of the meeting date. Recognizing that time-sensitivity may be a consideration, the timeline for acknowledgement and approval of urgent CLC meeting minutes will be identified on a case by case basis and stipulated in writing in both the draft meeting minutes and email communication accompanying the meeting minutes.

Action items from meetings will be captured, agreed upon by all CLC members and documented. BW Gold may respond to issues raised by CLC members at the meetings, where responses would be minuted, or via follow up with written correspondence.

Meeting minutes will be made publicly available in the Blackwater Project office in Vanderhoof. Future consideration will be given to making the minutes available on a website.

3.7 Evaluation

On an annual basis, the CLC members will review and consider the effectiveness of the committee.

The Secretariat will develop a survey in conjunction with the Co-Chairs to evaluate the effectiveness of the CLC. A minimum of one month before the annual review, the Secretariat will distribute the survey to CLC members to complete. CLC members must respond to the survey within ten (10) business days. The Secretariat will compile the survey results and those results will be presented and discussed at a CLC meeting.

3.8 Review and Amendment of Terms of Reference

Concurrent with the evaluation described in Section 3.7, the CLC will review this ToR and recommend changes for the purpose of improving the effectiveness of the CLC or achieving efficiencies.

A CLC member may also provide a written request for a change to the ToR to BW Gold. BW Gold will discuss and consult with other CLC members on the proposed change and then provide the amended Terms of Reference to EAO for review and approval. If a change is requested that is not agreed to by BW Gold, a written response will be provided to the member who requested the change.

3.9 Costs

Committee members may receive reimbursement for reasonable costs (i.e. mileage) for attending an in-person meeting. Otherwise, each member will be responsible for its own costs incurred in participating in the CLC.

APPENDIX A SUMMARY OF CLC MEMBER COMMENTS ON TERMS OF REFERENCE

Appendix A: Summary of CLC Member Comments on Terms of Reference

Table 1 summarizes CLC member comments on Version 1.0 ToR dated January 2021. Comments were received on the ToR as follows: CLC member verbal comments during January 13, 2021 meeting; as well as comments provided by email (January 13, 2021) from the City of Quesnel. Revisions made by Artemis Gold in May 2021 are also included. Typographical comments are not included.

Table 1: Summary of CLC Member Comments on Version 1.0 of the CLC Terms of Reference and BW Gold Responses

#	ToR Section #	Comment	BW Gold Response ¹
1	3.2.2	CLC member commented on the need for members to be responsive, responsible and agile, in consideration of the dynamic nature of the Project.	New sentence added to Section 3.2.2 as follows: <u>The members commit to being engaged and responsive to the CLC initiative in a prompt and flexible manner.</u>
2	3.2.3 & 3.2.4	Discussion that the annual timing of soliciting nominations for CLC Co-Chairs will be determined closer to the finalization of the TOR.	Footnotes 2 and 3 added to Version 2.0 to address comment. Footnote states: <u>"Nomination dates may vary in the first year, pending timing for acceptance the ToR."</u>
3	3.3	Discussion around the need for the CLC to convene more than twice a year during the pre-construction and construction phases.	New sentence added to Section 3.3 as follows: <u>"During the pre-construction and construction phases, the CLC anticipates meeting more than twice a year."</u>
4	3.3, 3.5.1 and 3.6	Discussion around the possibility for the CLC to be convened on a short timeline or urgent matter.	New paragraph added to Section 3.3 as follows: <u>"Certain events or topics, such as time-sensitive matters, may require the CLC to convene on short notice. Section 3.5.1 outlines the process to develop and distribute an urgent meeting agenda. Section 3.6 discusses documentation and reporting associated with urgent CLC meetings."</u> Section 3.5.1 (Meeting Agenda Development and Distribution) addresses urgent meetings as follows: <u>"In the case of an urgent meeting, all reasonable efforts will be made by the Co-Chairs and Secretariat to distribute the agenda in advance of the meeting. These meetings will address only those agenda item(s) deemed to be urgent."</u>

¹ Underlined text indicates new or added text.

#	ToR Section #	Comment	BW Gold Response ¹
			<p>Section 3.6 (Documentation and Reporting) has been updated to incorporate urgent CLC meetings as follows:</p> <p><u>"In the case of an urgent CLC meeting, the Secretariat will make best efforts to circulate meeting minutes to CLC members within three (3) business days of the meeting date. Recognizing that time-sensitivity may be a consideration, the timeline for acknowledgement and approval of urgent CLC meeting minutes will be identified on a case by case basis and stipulated in writing in both the draft meeting minutes and email communication accompanying the meeting minutes."</u></p>
5	3.3, 3.4, and 3.5.1	Discussion of the need to compile text related to the development and distribution of CLC draft and finalized agendas.	<p>Sentences and references to agenda development and distribution from Section 3.3 and 3.4 have been compiled and aligned in Section 3.5.1. Section 3.5.1 has been entitled: "Meeting Agenda Development and Distribution".</p>
6	3.1	Clarifications made by Artemis Gold.	<p>Added the following sentences to the beginning of Section 3.1 as follows:</p> <p><u>"In 2012, a community liaison committee was established during the Blackwater Project environmental assessment phase and it included representatives from the District of Vanderhoof, Village of Fraser Lake, Village of Burns Lake, District of Fort St. James, City of Quesnel, Regional District of Bulkley Nechako, Cariboo Regional District, Northern Health Authority (now named Northern Health), School District #91, College of New Caledonia, Connexus Community Resources, and NEWSS (the "Original Members").</u></p> <p><u>As referenced in Section 1 (Background and Objectives), Condition 37 of the EAC requires the establishment of a Community Liaison Committee for the purpose summarized in such section."</u></p>

#	ToR Section #	Comment	BW Gold Response ¹
7	3.1	Clarifications made by Artemis Gold.	Removed the following sentence from the end of the second paragraph in Section 3.1: “and NH. Historically, the community liaison committee that was established during the Blackwater Project environmental assessment phase, included representatives from the District of Vanderhoof, Village of Fraser Lake, Village of Burns Lake, District of Fort St. James, City of Quesnel, Regional District of Bulkley Nechako, Cariboo Regional District, Northern Health Authority (now named Northern Health), School District #91, College of New Caledonia, Connexus Community Resources, and NEWSS.”
8	3.1	Clarifications made by Artemis Gold.	In the third paragraph in Section 3.1 replaced the following: “To maintain continuity, organizations and communities previously involved with the committee will be invited to join the CLC.” with: <u>“To maintain continuity, original members will be invited to join the CLC.”</u>
9	3.2.5	Clarifications made by Artemis Gold.	Added the following sentence at the end of the second paragraph in Section 3.2.5: <u>“BW Gold will cover costs for CLC meetings as set out in Section 3.9”</u> .
10	3.2.6	Clarifications made by Artemis Gold.	Added the following two sentences to Section 3.2.6: 1) <u>“The need to invite such government agencies or groups will be decided on an as-needed basis by the CLC depending on the topic being discussed.”</u> 2) <u>“The Co-Chairs will decide and approve on the third party consultants that may be required to support the CLC.”</u> Additionally, the word “third party” added to a sentence as follows: “In the case that <u>third party</u> consultant services are required to support the CLC, BW Gold will be responsible for their compensation”.

APPENDIX C DRAFT INFORMATION REQUEST FORM

Appendix C: Draft Information Request Form

The purpose of the Information Request Form (Form) is to enable BW Gold to collect data from CLC members to support monitoring of Project effects and provide insight regarding understanding of mitigation effectiveness. The information collection will focus on indicators and information that is not publicly available or does not have annual updates. Data collection will be focused on those communities anticipated to be affected by the Project, namely Vanderhoof, Prince George, Fraser Lake, Burns Lake, Fort St James, and Quesnel, and the Indigenous communities of UFN, LDN, StFN, SFN, NWFN, and NFN. Data collection will be complemented with an interview.

The following is a draft Form which will be customized to specific CLC members to collect relevant information and may be revised periodically to address monitoring needs.

The following information may be requested from the specific CLC members:

- CLC Indigenous and non-Indigenous communities:
 - Community specific information regarding population changes;
 - Statistics on the use of social services in local communities;
 - Qualitative information on changes in community well-being; and
 - Open-ended questions regarding other community impacts.
- Northern Health:
 - Number of times health services were accessed by community by key service category;
 - Statistics on communicable disease rates by community or aggregate;
 - The number of non-local project workers that are presenting to local health facilities (including specifications for 1) urgent/non-urgent and 2) occupational/non-occupational demands);
 - The number of Diagnostic and Treatment Centre and/or Emergency Room visits by non-residents, to understand cumulative effects of shadow populations;
 - Qualitative information regarding notable changes in community health/well-being; and
 - Open-ended question regarding other impacts on health services.
- School District #91 and College of New Caledonia:
 - Number of registered students and changes in demand for educational services experienced by School District #91 and College of New Caledonia (CNC);
 - School enrollment numbers;
 - Annual enrollments in mining-related training, institution and community;
 - Existing and foreseeable program deliver related to mining industry; and
 - Open-ended question regarding other impacts on education services.
- Connexus Community Resources:
 - Open ended questions regarding changes in volume/ services delivery for the elderly, disabled, families and children with special needs, by community.
- Nechako Environment and Water Stewardship Society:
 - No questions identified at this time.

APPENDIX D DRAFT CEMMP ANNUAL REPORT TABLE OF CONTENTS

Appendix D: Draft Annual CEMMP Report Table of Contents

Section Heading	Content Notes
Executive Summary	■ Executive summary and infographics, where available
Chapter 1: Introduction	
1.1 Blackwater Gold Project Overview	■ Description of Project
1.2 Purpose and Scope	■ Description of purpose of annual CEMMP and CEMMP-R
1.3 Compliance Obligations	■ Summary of compliance obligations
Chapter 2: Methods	
2.1 Communities	■ Description of methods, data inputs and monitoring indicators
2.2 Predicted Impacts and Indicators	
2.3 Information Sources	
2.4 Data Limitations	
Chapter 3: Demographics	
3.1 Population	■ Assessment of Project impacts, including predictions, data, interpretation, related to population and in-migration. Proxy data may be used to assess effects.
3.2 In-migration	
3.3 Mitigation Measures and their Effectiveness	
Chapter 4: Employment, Training, and Skill Development	
4.1 Employment	■ Assessment of Project impacts, including predictions, data, interpretation on employment and training
4.2 Employment by Gender and Job Function	■ Assessment of success of mitigation measures
4.3 Indigenous Workers and Job Function	
4.4 Employment based on residence	
4.5 Training and Skill Development	
4.6 Mitigation Measures and their Effectiveness	
Chapter 5: Regional and Local Services	
5.1 Education	■ Assessment of Project impacts (prediction, data, interpretation) on regional and local services
5.2 Training Programs and Apprenticeships	■ Assessment of success of mitigation measures
5.3 Health Services	
5.4 Protective services	
5.5 Social Services	
5.6 Emergency Services	
5.7 Mitigation Measures and their Effectiveness	
Chapter 6: Family and Community Well-being	
6.1 Employment Income	■ Assessment of Project impacts (prediction, data, interpretation) on family and community well-being
6.2 Community Crime	■ Assessment of success of mitigation measures
6.3 Employee Assistance Program	
6.4 Project Turnover	
6.5 Mitigation Measures and their Effectiveness	
Chapter 7: Engagement and Feedback	
7.1 Engagement with Aboriginal Groups, land users and tenure holders	■ Summary of engagement activities with Aboriginal Groups, land and road users, tenure holders regarding Project impacts on their experience in the vicinity of Project activities
7.2 Mitigation Measures and their Effectiveness	■ Assessment of success of mitigation measures
7.3 Community Feedback Summary	■ Summary of comments received via Community Feedback Mechanism
	■ Summary of complaints and resolution
Chapter 8: Conclusions	
8.1 Summary of Effectiveness of Mitigation Measures	■ Summary of effectiveness of mitigation measures
8.2 Adaptive Management Recommendations	■ Description of any changes to mitigations and any new measures

APPENDIX E COMMUNITY FEEDBACK FORM



Blackwater Mine

For Internal Use

Case Number: _____

Received by: _____

Department: _____

Blackwater Gold Project Community Feedback Form

Date:
(DD-MM-YYYY) _____

Address:
(Optional) _____

Provided by:
(Optional) _____

Email:
(Optional) _____

Telephone:
(Optional) _____

Closest Community:

Binche Whut'en First Nation	<input type="checkbox"/>
Burns Lake	<input type="checkbox"/>
Burns Lake Nation	<input type="checkbox"/>
Cheslatta Carrier Nation	<input type="checkbox"/>
Fort St James	<input type="checkbox"/>
Fraser Lake	<input type="checkbox"/>
Lake Babine Nation	<input type="checkbox"/>
Lhoosk'uz Dene	<input type="checkbox"/>
Nadleh Whut'en First Nation	<input type="checkbox"/>
Nak'azdli Nation	<input type="checkbox"/>
Nazko First Nation	<input type="checkbox"/>
Nee Tahi-Buhn Band	<input type="checkbox"/>
Prince George	<input type="checkbox"/>
Quesnel	<input type="checkbox"/>
Saik'uz First Nation	<input type="checkbox"/>
Skin Tyee Nation	<input type="checkbox"/>
Stellat'en First Nation	<input type="checkbox"/>
Takla Nation	<input type="checkbox"/>
Tl'azt'en First Nation	<input type="checkbox"/>
Tsilhqot'in Nation	<input type="checkbox"/>
Ulkatcho First Nation	<input type="checkbox"/>
Vanderhoof	<input type="checkbox"/>
Yekooche First Nation	<input type="checkbox"/>

Feedback Category:

Business / Procurement	<input type="checkbox"/>
Environment	<input type="checkbox"/>
Safety	<input type="checkbox"/>
Social / Community	<input type="checkbox"/>
Other	<input type="checkbox"/>

Other Category:
(Please specify) _____

Other Community:
(Please specify) _____



Blackwater Mine

Please provide us with details about your comment, question, or concern.

Suggested action(s), if applicable.

Would you like to receive a copy of your submission?

Yes:

☐

No:

☐

Would you like to receive a response once this comment has been addressed by Artemis Gold Inc.? If yes, please provide your contact information on this form.

Yes:

☐

No:

☐

(Please note that anonymous submissions will not receive a response unless alternative contact information is provided below.)

Alternate Contact (First name / last name; optional):

Alternate Address (optional):

Alternate Telephone (optional):

Alternate Email (optional):
