



Blackwater Mine



Accidents and Malfunctions Administration and Communication Plan

February 2026

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Document history

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Acronyms and Abbreviations

Aboriginal Groups or Indigenous nations	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stelat'en First Nation and Nazko First Nation (as defined in the Project's Environmental Assessment Certificate #M19-01)
AMCP	Accidents and Malfunctions Administration and Communication Plan
Application	Application for an Environmental Assessment
Artemis	Artemis Gold Inc.
BC	British Columbia
BW Gold	BW Gold Ltd.
C&E	Compliance and enforcement
CEO	Chief Executive Officer
CM	Construction Manager
Code	Health, Safety, and Reclamation Code for Mines in British Columbia
ECD	Environmental Control Dam
DS	Decision Statement
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
EM	Environmental Manager
EMC	Environmental Monitoring Committee
EMLI	Ministry of Energy, Mines and Low Carbon Innovation
EMP	Environmental management plan
EMS	Environmental Management System
ENV	Ministry of Environment and Climate Change Strategy
EPCM	Engineering, Procurement and Construction Management
ERAP	Emergency Response Assistance Plans
FLNRORD	Ministry of Forests, Lands, Natural Resource Operations and Rural Development
GM	General Manager
IAAC	Impact Assessment Agency of Canada

Indigenous groups or Aboriginal Peoples	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stelat'en First Nation, Nazko First Nation, Skin Tye Nation, T̓silhqot'in Nation, Métis Nation British Columbia, and Nee-Tahi-Buhn Band (as defined in the Project's Decision Statement)
km	Kilometre
MCM	Ministry of Mining and Critical Minerals
MERP	Mine Emergency Response Plan
MoE	Ministry of Environment
MRT	Mine Rescue Team
MSDP	Mine Site Water and Discharge Monitoring and Management Plan
New Gold	New Gold Inc.
OMS	Operation, Maintenance, and Surveillance
PPA	Potential Problem Analysis
TDG	Transportation of Dangerous Goods Regulation
VP	Vice President
WTP	Water Treatment Plant

1.0 Mine Overview

1.1 Mine and Proponent

BW Gold Ltd., a wholly owned subsidiary of Artemis Gold Inc. (Artemis), has developed the Blackwater Mine (the Mine), an open pit gold and silver mining project.

The Mine, located in central BC, is approximately 112 km southwest of Vanderhoof, 160 km southwest of Prince George, and 446 km northeast of Vancouver, BC. The Mine is currently 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.

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 Mine uses a gravity circuit and whole ore leach, as well as conventional drill and blast methods. The gold and silver are recovered into a gold-silver doré product and shipped from the Mine.

Electrical power is supplied by an approximately 135 kilometre (km), 230 kilovolt (kV) overland transmission line that connects to the BC Hydro grid at the Glenannan substation located near the Endako mine, 65 km west of Vanderhoof, British Columbia (BC).

Construction began in October 2022. The first gold and silver pour at Blackwater was achieved in January 2025. Commercial production was declared on May 1, 2025.

Mine development is being undertaken in a phased approach, starting with an initial throughput of 5.5 million tonnes (Mt) per year and potentially increasing this to the maximum throughput approved in the Environmental Assessment Certificate (EAC) of 22 Mt per year until the end of the 23-year life of mine (LoM).

1.2 Indigenous Groups

The Mine 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 Mine transmission line cross parts of the traditional territories of Nadleh Whut'en First Nation, Saik'uz First Nation, and Stellat'en First Nation (collectively, the Nechako First Nations [NFNs]), as well as the traditional territories of the Nazko First Nation, Nee Tahi Buhn Band, Cheslatta Carrier Nation, and Yekooche First Nation (Environmental Assessment Office [EAO] 2019a, 2019b).

1.3 Permits and Mineral Tenures

Surface and subsurface rights over the Mine area are controlled by the Crown.

The Mine received an EAC (M19-01) on June 21, 2019, under the BC *Environmental Assessment Act* (2002), and an Environmental Assessment Decision Statement (DS) on April 15, 2019, under the *Canadian Environmental Assessment Act, 2012* (2012), approving the Mine with conditions under New Gold Inc. (New Gold). In August 2020, Artemis acquired the mineral tenures, assets, and rights in the Blackwater Mine that were previously held by New Gold. On August 7, 2020, the EAC was transferred to BW Gold under the BC *Environmental Assessment Act* (2018), and on March 8, 2023, BW Gold received the Joint Application for *Mines Act / Environmental Management Act* Permits (Joint MA/EMA Application /

Application) for the Mine.

On June 22, 2021, the Mine received *Mines Act* Permit M-246, and on June 24, 2021, the Mine received *Environmental Management Act* (EMA) Permit PE-110602, authorizing early construction works. Later, on March 8, 2023, *Mines Act* Permit M-246 was amended for the approval of a Mine Plan and Reclamation Program, and further amended on September 4, 2024 and October 29, 2024. On May 2, 2023, BW Gold received EMA Permit PE-110650 authorizing discharge of air contaminants to the atmosphere and Permit PE-110652 authorizing discharge of effluent to surface and groundwater from the Mine. Permits are updated as needed, based on changing regulations, conditions, and requirements.

2.0 Management Plan Overview

2.1 Purpose and Objectives

The purpose of the Accidents and Malfunctions Administration and Communication Plan (AMCP) is to identify the means by which BW Gold will notify Indigenous groups, Tatelkus Lake Indian Reserve 28, nearby residents and businesses, local communities or other user groups should an accident or malfunction likely to cause an adverse environmental effect occur in relation to the Mine.

The AMCP objectives are to:

- Identify the types of accidents and malfunctions requiring notification, timelines for providing notice, information to be included in a notice, and how a notice will be provided;
- Identify the measures to be implemented in response to each type of accident and malfunction identified in the plan to mitigate any adverse environmental effects caused by the accident and malfunction;
- Identify response plans for accidents and malfunctions for dam breaches and water treatment plant failures or shutdowns
- Set out the process for identifying and providing opportunities to Indigenous groups, nearby residents and local communities or other user groups to assist in accident or malfunction response; and
- Identify the approach to manage risk and monitor and report on Mine-vehicle accidents.

The AMCP, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, Closure and Post-Closure, and to the satisfaction of the Environmental Assessment Office (EAO).

The AMCP addresses:

- EAC Condition 36, which requires development of this plan; and
- DS Conditions 10.1, 10.2, 10.3, 10.4 and 10.5, which require the development of this plan.

Concordance tables identifying where the requirements in the EAC and DS are located in the AMCP are provided in Appendix A and B, respectively.

Additionally, the AMCP is related to the Mine Emergency Response Plan (MERP).

2.2 Exclusions

Accidents or malfunctions related to on-site medical emergencies and the health, safety, or wellbeing of on-site personnel, while important, are unlikely to cause an environmental effect and therefore are not considered in the AMCP. These types of accidents and malfunctions are addressed in the MERP (MERP;

BW Gold 2025).

The AMCP also does not address sections 1.7.1 to 1.7.3 (Reportable Incidents) of the Health, Safety, and Reclamation Code for Mines in British Columbia (Code; MCM 2024).

Accidents or malfunctions where adverse environmental effects are unlikely to occur are not addressed in the AMCP.

3.0 Engagement and Consultation

This plan was developed in consultation with Ministry of Mining and Critical Mineral (EMPR, now MCM), Northern Health Authority (NHA), Environment Canada (ENV), Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD), and Aboriginal / Indigenous Groups and was approved for implementation by the EAO on February 18, 2022.

Proposed revisions to this plan were reviewed and discussed with the Blackwater Joint Occupational Health and Safety Committee, Mine Manager, and Artemis Gold staff involved in emergency response.

The draft revised version of the AMCP was provided to NHA, ENV, FLNRORD, Aboriginal / Indigenous Groups, as well as MCM¹, Health Emergency Management BC, and the Environmental Life of Mine Committee (ELoMC) on November 15, 2025.

This final revised version was provided to the same recipients and is published on the Artemis website as required by DS Condition 2.14.

4.0 Roles and Responsibilities

BW Gold must ensure 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. Employees contribute to this responsibility and some of the key roles are listed in Table 4-1. Note that during Closure and Post-Closure, staffing levels will be reduced to align with the level of activity associated with these phases and therefore some positions may be eliminated.

Table 4-1 Blackwater Gold Roles and Responsibilities

Role	Responsibility
General Manager (GM) – Development	The GM is responsible for managing the Mine’s operations, the Mine’s administration services, and external entities, as well as for 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 the President. The GM approves the content of the AMCP.
Mine Manager	The Mine Manager, as defined in the <i>Mines Act</i> (1996), 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 the GM.

¹ While Condition 36 states that the plan must be developed in consultation with EMPR (now MCM) BW Gold has been advised that MCM does not wish to be consulted on this plan, as the EAO will reach out directly to MCM to coordinate the review process should MCM’s involvement be required.

Manager - Environment	The ME is responsible for the day-to-day management of the Project's environmental programs and compliance with environmental permits, as well as for updating the EMS and management plans. The ME or designate will be responsible for reporting non-compliance contractors, the Company, and regulatory agencies, where required. Reports to the Mine Manager.
Departmental Managers	Departmental Managers are responsible for implementation of the EMS relevant to their areas. Report to Mine Manager.
Aboriginal Monitors	Aboriginal Monitors are required under EAC Condition 17 and will be responsible for monitoring for potential effects from the Mine on the Indigenous interests. Aboriginal Monitors will be involved in the adaptive management and follow-up monitoring programs.
Employees and Contractors	Employees are responsible for being aware of permit requirements specific to their roles and responsibilities. Report to Departmental Managers.
Qualified Professionals and Qualified Persons	Qualified registered professionals and qualified persons will be retained to review objectives and conduct various aspects of environmental and social monitoring as specified in environmental and social management plans.

5.0 Accidents and Malfunctions

5.1 Types of Accidents and Malfunctions Requiring Notification

Table 5-1 lists the types of accidents and malfunctions likely to cause an adverse environmental effect that may occur in relation to the Mine. The types of accidents and malfunctions listed align with those in the Mine Emergency Response Plan (MERP), which provides a comprehensive list of accidents and malfunctions. The types of accidents and malfunctions listed, as well as the potential adverse environmental effects, are aligned with the Application for an Environmental Assessment Certificate (Accidents and Malfunctions Assessment [ERM Consultants Canada Ltd. 2016]).

Table 5-1 Accidents and Malfunctions Likely to Cause an Adverse Environmental Effect and Response Plans to Mitigate Adverse Effects to the Environment Caused by the Accident or Malfunction

Accident or Malfunction	Potential Adverse Environmental Effect	Response Plans to Mitigate Adverse Effects to the Environment Caused by the Accident or Malfunction ¹
<p>Dams – Emergency Response Protocols</p> <p>Examples include: TSF Dam Failure or Breach Environmental Control Dam (ECD) Failure Freshwater Reservoir Failure</p>	<p>Change to: Receiving environment surface water quality Receiving environment fish and fish habitat Terrestrial habitat Terrestrial species</p>	<p>As applicable to a TSF Dam Failure or Breach: The initial response to any failure at the TSF will be to shutdown pumping of tailings to the TSF. The spill will be contained to the extent possible using temporary earthen or snow dams, silt fences, sandbags, and other available equipment. Appropriate spill control equipment will be maintained at the Project site. Tailings cleaned up from a spill will likely need to be placed in the open pit unless solid enough to place on one of the on-land waste dumps. The Mine Manager will work closely with local residents and authorities to ensure the needs of downstream residents are met should any such event occur. Due to the implementation of the EMS and the numerous operational controls to be put in place, including the third party oversight required under the Code, the likelihood of a failure of the TSF is very rare. A remedial action plan will be developed in consultation with appropriate government agencies in the event of TSF dam failure. Spilled tailings and waste rock will need to be effectively contained because of the potential for acid rock drainage characteristics. This means that the Proponent will need to excavate spilled tailings and haul them back to the repaired TSF. Alternatively, a cover could be engineered over the deposited material, if feasible. All areas where tailings are removed will be restored and revegetated to the extent practical. A surface water and groundwater monitoring program will be created to monitor the movement of aqueous parameters and the success of rehabilitation measures.</p> <p>As applicable to an Environmental Control Dam (ECD) Failure: Conduct emergency repairs, if safe to do so. The spill will be contained to the extent possible using temporary earthen or snow dams, silt fences, sandbags, and other available equipment. Appropriate spill control equipment will be maintained at the Project site. A water monitoring program will be developed to monitor aqueous concentrations of any contaminants and determine when the freshwater could be used for fisheries management purposes. In the event the water in the freshwater reservoir is contaminated and cannot be directly discharged to Davidson Creek, instream fish needs for water can be provided by directly pumping to Davidson Creek from Tatlukuz Lake. There is adequate pumping capacity in the design to provide for the required flows at any time of year.</p> <p>As applicable to a Freshwater Reservoir Failure: In the event of a failure or imminent failure of the freshwater reservoir, an emergency repair will occur once it is safe to do so. Pumping from Tatlukuz Lake will immediately cease. A bypass line will already be in place to maintain flow to Davidson Creek. Silt fences, sandbags, and other erosion and sediment control measures will be deployed to prevent the entry of surface materials into downstream watercourses. Appropriate spill control equipment will be maintained at the Project site.</p>
Water Treatment Plant Failure/Shutdown	<p>Change to: Surface water quality and Sediment quality in Davidson Creek</p>	<p>The Water Treatment Plant (WTP) will maintain and implement a current Operation, Maintenance, and Surveillance (OMS) manual.</p>
Water Supply System (Pump System)	<p>Change to: Surface water quantity in Davidson Creek Fish and fish habit in Davidson Creek</p>	<p>Maintain minimum instream flow needs for fish in Davidson Creek from the freshwater reservoir. Service or replace pump(s).</p>
<p>Spill Response</p> <p>Examples include: Spills of hazardous substances outside of engineered containment Transportation accident – hazardous materials, excluding fuel Major fuel release during transport to Project Accidental discharge of effluent streams (sewage treatment plant) Fuel releases from storage facilities and dispensing areas</p>	<p>Change to: Surface water and sediment quality (spill to water) Fish and fish habitat (spill to water) Terrestrial habitat Terrestrial species</p>	<p>Residents nearby a reportable spill, as defined under the BC Spill Reporting Regulation (B.C. Reg. 187/2017), will be notified by the Mine Manager or designate and apprised of the nature and extent of the spill. Potential ignition sources will be removed in the event of a spill of flammable or combustible materials if safely possible, and the spill will be stopped. Appropriate corporate and external personnel will be notified, and an assessment will be conducted to determine the best means to prevent immediate environmental impacts. Spill countermeasures will include the use of absorbent materials, establishment of a collection trench downslope, and setting collection booms on water if effective for the spilled material. Work closely with local authorities, including the Emergency Management BC to manage, clean up, and remediate the impacted area. For a reportable spill as defined under the BC Spill Reporting Regulation (B.C. Reg. 187/2017) hazardous material spill, a review will be conducted and a report issued to ensure that the required design changes and/or procedures are in place to avoid a repeated spill.</p>

Water Pipeline Failure
Tailings Pipeline Failure
Sedimentation Pond Failure

When fuel is contained by booms, berms, or other means, it may be pumped, skimmed, or mopped with absorbent matting and disposed of in an approved facility designed to manage such wastes. If a spill were to directly enter a fast moving watercourse, it may not be possible to completely contain and remediate the spill. Clean-up, and potentially remediation, will reduce long-term environmental impacts to the extent practical. After any spill, a review will be conducted to ensure that the required design changes, procedures, and appropriate monitoring measures are in place to prevent a repeated incident.

As applicable to an Accidental Discharge of Effluent Streams (sewage treatment plant):
 In the event that the sewage treatment plant operator cannot address the off-specification discharge, a manufacturer's engineer will be brought to site to resolve the sewage treatment plant water quality issue. The source of the poor water quality will be determined and operational or design changes made as appropriate.
 BW Gold will work closely with local authorities to ensure environmental health is maintained at all times.
 For any chronic effluent quality issues, a review will be conducted to ensure that the required design changes and procedures are in place to ensure that poor effluent quality will not be repeated.

As applicable to a Water Pipeline Failure:
 In the event of a leak or failure, pumps will be shut down and the pipeline repaired. If required, erosion and sediment control measures such as matting or silt fencing will be employed to prevent overland runoff containing sediments from directly entering a watercourse.

As applicable to a Tailings Pipeline Failure:
 If a leak or failure is detected in the tailings pipeline, flow to the faulty pipeline will cease. Heavy equipment will be used along with spill containment materials to contain or limit the discharge of tailings and effluent in an uncontrolled manner to the environment. Depending on the amount of tailings spilled and whether tailings enter Davidson Creek, a remedial action plan may be developed in consultation with appropriate regulatory agencies. Spilled tailings will be excavated and loaded on a haul truck, or vacuumed, and transported to the TSF.

As applicable to a Sedimentation Pond Failure:
 Immediately after a spill is detected, corrective actions would be implemented to contain the spill and preserve downstream water quality. Appropriate sedimentation control and spill response supplies will be maintained at the Project site. Ongoing monitoring of downstream surface water quality monitoring stations will provide indication of potential undesired releases further upslope.

<p>Transport Incidents</p> <p>Examples include: Transportation accident – non-hazardous materials and work crews Aircraft Accidents on Site</p>	<p>Change to: Surface water quality and quantity Fish and fish habitat</p>	<p>Appropriate corporate and external personnel will be notified as appropriate, and spilled material will be removed. The affected environment will be rehabilitated as needed. After any major accident, a review will be conducted to ensure that the required design changes and/or procedures are in place to avoid a repeated spill.</p>
<p>Fire/Explosion</p> <p>Examples include: Forest Fire (Project-related)</p>	<p>Change to: Air quality Surface water flow Surface water and sediment quality Soil quality Terrestrial habitat Terrestrial species Fish and Fish Habitat</p>	<p>Priorities for fire response will include controlling the spread of the fire. A trained site fire response crew will provide the initial firefighting response, with assistance from local municipal volunteer firefighting services being requested if required. If local assistance is not sufficient, firefighting resources from Prince George will be called upon for assistance.</p>
<p>Premature Blast or Unplanned Explosion</p> <p>Examples include: Explosive Accident Outside Pit Fly Rock from Blasting</p>	<p>Change to: Terrestrial habitat Fish and fish habitat</p>	<p>With controls in place and with only certified employees setting off blasts, no accidents are expected. Road blocks set up prior to blasting as a safety measure for fly rock will be removed immediately after the blast by mine services personnel, if required.</p>
<p>Major Power Outage</p>	<p>Change to: Surface water flow</p>	<p>Standby generators will be utilized for system critical facilities.</p>

	Surface sediment quality Fish and fish habitat	
Geotechnical Event	Change to: Terrestrial habitat Fish and fish habitat	Secure the failure area. Stockpile slope will be re-contoured in place depending on the scale of the failure. If the slope failure caused a liquid spill, silt fencing or other erosion and sediment control measures such as a temporary sediment retention pond would be deployed downslope of the spill to prevent sediment-laden waters from entering a watercourse. Inspect and if required, repair perimeter water management structures Review and if required, modify design criteria under construction. Undertake a geotechnical stability analysis following a major stockpile failure. There are well established engineering analysis response procedures required following an open pit slope failure in conjunction with requirements under the Mines Act and Code.
Examples include: Low grade ore (LGO) stockpile slope failure Topsoil Stockpile Slope Failure Waste Stockpile Failure Open Pit Slope Failure During Operations		
Wildlife Interactions	Change to: Wildlife abundance	All wildlife interactions will be reported to the environment department and recorded. Established procedures will be followed as detailed in the following procedures. Wildlife SIDO (Wildlife SIDO (Sick, Injured, Dead, Orphaned) SOP Bear Management & Response
Examples include: Contact with wildlife on the roadway		

Notes:

1. As applicable based on the applicable accident or malfunction; the response action taken must be matched to the accident and malfunction and not all details can be known until the time of the accident or malfunction.

6.0 Risk Matrix for Classifying Accidents and Malfunction

As soon as reasonably possible following an accident or malfunction, BW Gold shall classify the accident or malfunction (i.e., insignificant, minor, moderate, significant, and high) using consequence definitions from the MERP that are applicable to accidents or malfunctions likely to cause an adverse environmental effect occur in relation to the Mine (Table 6-1). The definition for consequences of occurrences of accidents and malfunctions are guidelines only, and both categories of consequence must be met for an accident or malfunction to fall within a consequence descriptor.

Table 6-1 Definitions for Consequence of Occurrences of Accidents and Malfunctions

Consequence Descriptor	Environment ^{1,2,3}	Legal & Regulatory ^{4,5,6}
Insignificant	Lasting days or less; affecting small area (metres); receiving environment with no sensitive habitats and no biodiversity value (e.g. urban / industrial areas).	Technical noncompliance. No warning received; no regulatory reporting required.
Minor	Lasting weeks; affecting limited area (hundreds of metres); receiving environment altered with little natural habitat and loss of diversity value	Breach of regulatory requirements. Report /involvement of authority. Attracts administrative fine
Moderate	Lasting months; affected extended area (kilometer's); receiving environment comprising natural habitat and moderate biodiversity value.	Minor breach of law; report / investigation by authority. Attracts compensation / penalties / enforcement action.
Significant	Lasting years; affecting area on subbasin scale; receiving environment classified as having sensitive natural habitat with high biodiversity value.	Breach of the law, may attract criminal prosecution, penalties / Enforcement action. Individual license temporary revoked.
High	Permanent impact; affecting area on a whole basin or regional scale; receiving environment classified as extremely sensitive natural habitat with exceedingly high biodiversity value.	Significant breach of the law. Individual or company lawsuits; permit to operate modified or withdrawn.

Notes:

1. Insignificant and minor accidents and malfunctions have clearly defined circumstances and can be managed by affected operations area. A minor spill or release is an example.
2. Moderate accidents and malfunctions are emerging and are not clearly defined. An unplanned release is an example.
3. Significant and high accidents and malfunctions have acute adverse effects to the environment. An explosion and resulting uncontained fire is an example.
4. Insignificant and minor accidents and malfunctions result in a non-compliance with a permit condition or regulation.
5. Moderate accidents and malfunctions result in a non-compliance with a permit condition or regulation and a fine is anticipated.
6. Significant and high accidents and malfunctions result in a non-compliance with a permit condition or regulation and a forced shutdown is anticipated.

7.0 Notification Procedures, Response Plans and Response Assistance

Indigenous Nations and stakeholders will be notified of the accident and malfunctions presented in Table 5-1 as per the communication protocol summarized in Table 7-1, based upon consequence descriptors set out in Table 6-1.

If a specific accident or malfunction occurs that is not listed in Table 5-1, BW Gold shall assess the consequences of the occurrence in accordance with Table 6-1, and Indigenous nations and stakeholders will be notified in accordance with the procedure outlined in Table 7-1.

Project-related accidents that occur outside the mine boundary defined as the Permitted Mine Area under *Mines Act* permit M-246 (for example, transportation accidents involving dangerous goods) may require the same minimum communication protocols and regulatory notice requirements, however, will be dealt with on a case-by-case basis as carriers may need to implement their own ERAP (Emergency Response Assistance Plans as per the federal TDG Regulations). Communications protocols on these events will be managed but there will be timely communication between BW Gold and the transportation carriers internally to ensure no duplication of reporting.

A summary of the notification procedures (i.e., who will be notified, when they will be notified and the type of notification / delivery method) for the accidents and malfunctions listed in Table 5-1, based on their consequence descriptors, is provided in Table 7-1.

Table 7-1 Communication Protocol Summary

Consequence Descriptor	When to Notify	Who to Notify	Type of Notification
Insignificant	Within 30 days	Aboriginal Monitors	■ Include accident or malfunction in the Monthly Independent Environmental Monitor Inspection Report
Minor	Within 48 hours	Aboriginal Monitors ELoMC Members	■ Email notification
Moderate	Within 24 hours	Aboriginal Monitors ELoMC Members Health Emergency Management BC Impact Assessment Agency of Canada (IAAC) and EAO Compliance and Enforcement (C&E)	■ The AMCP does not apply as the protocol is covered in Section 6.4 of the MERP
Significant High	Immediately (day or night)	Aboriginal Monitors ELoMC Members Chiefs of all Nations Health Emergency Management BC IAAC and EAO C&E Nearby Local Government, Residents and Businesses	■ The AMCP does not apply as the protocol is covered in Section 6.4 of the MERP

7.1 Notification Timeline

Notification timeline will be determined based on consequence descriptors presented in Table 7-1

7.2 Type of Notification / Notification Methods

As per Table 7-1, notice will be provided by the Environmental Manager, or designate, for accidents and malfunctions with Insignificant or Minor consequence descriptors. External notification will be provided by the Incident Commander, or designate, for accidents and malfunctions with Moderate, Significant and High consequence descriptors in accordance with Section 6.4 of the MERP. All email notifications will include the information presented in Section 7.3.

7.3 Notification Information

Information to be provided in the initial notification to Indigenous groups and stakeholders will include:

- Date and location of the event;
- Summary description of the event;
- Assessment of the likely consequences of the event;
- Information on the accident or malfunction, including type and quantity of substance(s) released, location and duration of releases and potential impacts caused by the release;
- Remedial actions taken to date and those planned to be undertaken and a target schedule for implementation;
- Resources available and resources required;
- Any health advisories for applicable Indigenous groups and stakeholders; and
- Details of subsequent monitoring, as applicable, related to the accident or malfunction.

7.4 Contact Information and Management

A separate call-out sheet attached to the AMCP provides contact information for Indigenous groups, local governments, nearby residents and businesses, and other users of the Project area who could be affected by an accident or malfunction in relation to the Mine and likely to cause an adverse environmental effect (Appendix C²). As the call-out sheet contains 24-hour private contact information, it is not for general distribution. The updated drafts are made available to each department with controls for the version and number of copies.

Procedures for updates to the call-out sheet are as follows:

- Contact information is confirmed or updated annually, at a minimum;
- Confirmation is done through a procedure listed for each contact, in instances, where the procedure does not result in a contact then a request to the broader organization is initiated in order to update the contact information;
- Contact individuals and organizations can also initiate and update information and are encouraged to do so;
- Procedures for updating the contact information are adapted through time and customized to fit the contact individual or organization;

² Appendix C is the placeholder for the call-out sheet. For reasons of privacy, the call-out sheet can be supplied to reviewers upon request but is not available for general distribution.

- Updates are logged on the call-out sheet with the changes to the version date of the call-out sheet, last review date for each contact, next review date for each contact, and the call-out procedure, if required;
- The updated call-out sheet is immediately sent out to the relevant departments as a replacement; and
- The previous hardcopy version of the call-out sheet is destroyed with the master digital copy archived

7.5 Response Plans

Response plans are identified in Table 5-1, which will be implemented when applicable. Table 5-1 provides potential response actions to focus on the environment more so than the response actions in the MERP. As per the MERP, The Environmental Manager is responsible for overseeing all environmental aspects of the incident response and one of the first steps is to assess potential environmental impacts to support incident action planning. The response action taken must be matched to the accident and malfunction and not all details can be known until the time of the accident or malfunction.

7.6 Opportunities to Assist with Accident or Malfunction Response

BW Gold maintains an internal Business Directory where businesses can register and provide details about their services, experience, location, and First Nation business or partnership status. In addition to this general directory, BW Gold also manages dedicated First Nations Business Directories for Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nazko First Nation, Saik'uz First Nation, Nadleh Whut'en First Nation, and Stelat'en First Nation. These specialized directories include businesses that are confirmed by the nations themselves as First Nations-owned or First Nation-partnered.

When responding to incidents such as accidents or malfunctions at the mine site, BW Gold utilizes both the general and First Nation Business Directories to quickly identify regional and First Nation businesses that can provide timely support or specialized services. This process forms the initial step in assembling a targeted list of capable contractors, with priority given to regional, and First Nation businesses for immediate and effective response.

Once a targeted list of capable contractors is generated, a procurement process to establish a purchase order is initiated prior to a contractor mobilizing to the Mine.

7.7 Project Vehicle-related Accidents

The specific measures for avoidance, mitigation, and contingency measures are comprehensively presented in other plans. Depending on the consequence of the Project vehicle-related accident, the following plans may support the communication of a vehicle-related accident:

- Mine Site Traffic Control Plan (BW Gold 2022) – procedures for vehicle operation and road controls within and outside the mine site. All Project-related vehicles carry first aid kits and fire extinguishers in accordance with the BC Fire Code. Depending on the vehicle usage, Project vehicles may carry additional equipment, e.g., spill control kits.
- Fuel Management and Spill Control Plan (BW Gold 2023) – procedures for vehicle accidents resulting in spills of gasoline, diesel, oils, or transported materials.

- MERP (BW Gold 2025) – response framework for vehicle accidents that require emergency response for: spills, and incidences including injury, fires, and explosions. The Blackwater MRT is trained in mine rescue, materials handling, firefighting, crisis management, and incident command.

8.0 Written Reports and Annual Reporting

Reporting requirements for the AMCP are outlined in the EAC and the DS, which require written reports and annual reports. Written reports are provided at set intervals following an event which requires notification (Section 8.0), and annual reports, summarize activities undertaken to fulfil the applicable conditions in the reporting year.

8.1 Written Reports

As required by Condition 10.4.2, in the event of an accident or malfunction as set out in Table 5-1 that may have the potential to have an adverse environmental effect, a report will be submitted to IAAC no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include:

- A detailed description of the accident or malfunction and of its adverse environmental effects;
- A description of the measures that were taken to mitigate the adverse environmental effects caused by the accident or malfunction;
- Any view(s) from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects and the measures taken by the Proponent to mitigate these adverse environmental effects;
- A description of any potential residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; and
- Details concerning the implementation of the accident or malfunction response plan.

Per condition 10.4.3, the following information will be provided no later than 90 days after the incident:

- A description of the changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation;
- Any modified or additional measure will take into account the information submitted in the written report pursuant to Condition 10.4.2 (above); and,
- Additional views from Indigenous groups and advice from relevant authorities received regarding the incident.

These submissions will be made via email.

8.2 Annual Reporting

BW Gold will comply with the EAC and DS annual reporting requirements as they apply to this AMCP.

Information related to the AMCP will be part of the annual EAC Condition 5 self-assessment report, and the DS annual report (per condition 2.11.1). They will include a summary of activities undertaken to fulfill the applicable conditions in the reporting year.

9.0 Plan Revision

The AMCP is a living document to which periodic updates are expected. In particular, the AMCP will be reviewed and updated, as applicable, when the MERP is updated. As per section 3.0 Engagement and Consultation above, the AMCP was developed in consultation with EMPR (now MCM), NHA, ENV, FLNRORD, and Aboriginal / Indigenous Groups and was approved for implementation by the EAO on February 18, 2022. Therefore, consultation on the **revisions** to the approved plan will be conducted with the following parties:

- MCM³,
- NHA,
- ENV,
- FLNRORD, and
- Aboriginal / Indigenous Groups.

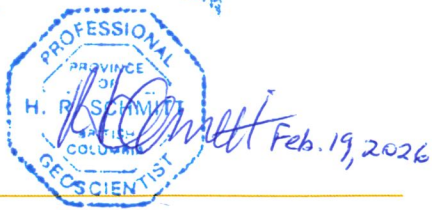
The most recent version for implementation of the AMCP will be posted on the Blackwater Mine Public Plans & Reports website as required by EAC Condition 42 and DS Condition 2.14.

³ While Condition 36 states that the plan must be developed in consultation with EMPR (now MCM) BW Gold has been advised that MCM does not wish to be consulted on this plan, as the EAO will reach out directly to MCM to coordinate the review process should MCM's involvement be required.

10.0 Qualified Professionals

This management plan was developed by the Qualified Professional below. The plan, and any amendments thereto, will be implemented to the satisfaction of a Qualified Professional.

Prepared by:



Rolf Schmitt, P. Geo.
Technical Consulting Director
EGBC No. 19824

ERM Consultants Canada Ltd.
EGBC Firm Permit to Practice No. 1001271

11.0 References

Legislation

- Canadian Environmental Protection Act, 1999*, SC 1999, c. 33.
- Controlled Products Regulations*, SOR/88-66.
- Drinking Water Protection Act*, SBC 2001, c. 9.
- Environmental Emergency Regulations*, 2019, SOR/2019-51.
- Environmental Management Act*, SBC 2003, c. 53.
- Explosives Act*; R.S.C., 1985, c. E -17.
- Fisheries Act*, RSC 1985, c. F-14.
- Hazardous Products Act*, RSC. 1985, c. H-3.
- Hazardous Waste Regulation*, BC Reg. 63/88.
- Impact Assessment Act*, RSC 2019, c. 28.
- Metal and Diamond Mining Effluent Regulations*, SOR 2002-222.
- Mines Act*, RSBC 1996, c. 293.
- Motor Vehicle Act*, RSBC 1996, c. 318.
- Public Health Act*, SBC 2008, c. 28.
- Spill Reporting Regulation*, BC Reg. 187/2017.
- Transport of Dangerous Goods Act*, RSBC 1996, c. 458.
- Transport of Dangerous Goods Regulation*, BC Reg. 231/2002.
- Transportation of Dangerous Goods Act*, SC 1992, c. 34.
- Transportation of Dangerous Goods Regulation*, SOR/2001-286.

Secondary

- BC EAO. 2019a. *Assessment Report for Blackwater Gold Mine Project (Blackwater) With respect to the Application by New Gold Inc. for an Environmental Assessment Certificate pursuant to the Environmental Assessment Act, S.B.C. 2002, c.43*. Prepared by the Environmental Assessment Office. May 17, 2019.
- BC EAO. 2019b. *Summary Assessment Report for Blackwater Gold Mine Project (Blackwater) With respect to the application by New Gold Inc. for an Environmental Assessment Certificate pursuant to the Environmental Assessment Act, S.B.C. 2002, c. 43*.
- BC EAO. 2019c. *In the matter of the ENVIRONMENTAL ASSESSMENT ACT S.B.C. 2002, c. 43 (the Act) and in the matter of an Application for an Environmental Assessment Certificate (Application) by New Gold Inc. (Proponent) for the Blackwater Gold Project Environmental Assessment Certificate #M19-01*.
- BC EMLI. 2024. *Health, Safety and Reclamation Code of British Columbia*. British Columbia Ministry of Energy and Mines.
- BW Gold. 2026. *Mine Emergency Response Plan (MERP)*.
- BW Gold. 2021. *Blackwater Gold Project. Joint Mines Act/Environmental Management Act Permits Application*. November 2021.

- CEA Agency. 2019. *Decision Statement Issued under Section 54 of the Canadian Environmental Assessment Act, 2012 to New Gold Inc. c/o Ryan Todd, Director, Blackwater Project. Sunlife Plaza Suite 610, 1100 Melville Street Vancouver, British Columbia V6E 4A6 for the Blackwater Gold Project.*
- Government of Canada. 2004. *Implementation Guidelines for Part 8 of the Canadian Environmental Protection Act, 1999 – Environmental Emergency Plans.* Environmental Emergencies Program. Environment Canada.
- MOE. 2015. *Technical Guidance. Assessing the Design, Size, and Operation of Sediment Ponds Used in Mining.* Version 1.0.
- New Gold. 2015. *Blackwater Gold Project Application for an Environmental Assessment Certificate / Environmental Impact Statement.* Prepared by AMEC Environment & Infrastructure for New Gold Inc. Vancouver, BC.
- Northern Health Emergency Management. 2019. *Emergency Response Roles and Responsibilities.* Rev. Feb 2019.
- WCB. 2000. *Engineering Section Report - Construction Noise.* Workers' Compensation Board: Vancouver, BC.

Appendix A Concordance with Environmental Assessment Certificate #M19-01 (June 21, 2019)

Table A- 1 Environmental Assessment Certificate #M19-01 Conditions and Location in the Accidents and Malfunctions Administration and Communications Plan

Condition #	Requirement	Location in the Plan
2	<p>Plan Development</p> <p>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:</p>	Section 2
	a) purpose and objectives of the plan, program or other document;	
	b) roles and responsibilities of the Holder and Employees;	Section 4, Table 4-1
	c) names and, if applicable, professional certifications and professional stamps/seals, of those responsible for the preparation of the plan, program, or other document;	Section 10
	d) schedule for implementing the plan, program or other document throughout the relevant Project phases;	Section 2 – The AMCP will be implemented in all Project phases.
	e) means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness;	See 36 (f); all accidents and malfunction are included in the MERP, therefore, none are listed in this plan including mitigation measures to address potential adverse effects arising from those accidents or malfunctions.
	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	Section 8
h) 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 9	
4	<p>Consultation</p> <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>	Section 3 describes when and how a draft of the AMCP was provided to Indigenous groups and Northern Health for review and comment.
<p>a) provide written notice to each such party that: 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:</p> <p>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</p>		

	<p>ii. if a timeframe for providing such views to the Holder is not specified in the relevant condition of this Certificate, specifies a reasonable period during which the party may submit such views to the Holder;</p>	
	<p>b) undertake a full and impartial consideration of any views and other information provided by a party in accordance with the timelines specified in a notice given pursuant to paragraph (a);</p>	
	<p>c) provide a written explanation to each such party that provided comments in accordance with a notice given pursuant to paragraph (a) as to:</p> <p>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</p> <p>ii) why such views and information have not been addressed in a revised version of the plan, program or other document;</p>	
	<p>d) maintain a record of consultation with each such party regarding the plan, program or other document; and</p>	
	<p>e) provide a copy of such consultation record to the EAO, the relevant party, or both, promptly upon the written request of the EAO or such party. The copy of such consultation record must be provided to the EAO, relevant party, or both, no later than 15 days after the Holder receives the request for a copy of the consultation record, unless otherwise authorized by the EAO.</p>	
36	<p>Accidents and Malfunctions Administration and Communication Plan</p> <p>The Holder must retain one or more Qualified Professionals or Qualified Persons to develop an Accidents and Malfunctions Administration and Communication Plan for the Project. The plan must be developed in consultation with FLNRORD, EMPR, ENV, NHA, and Aboriginal Groups. The plan must include at least the following:</p> <p>the means by which the Holder will acquire and maintain contact information for Aboriginal Groups, Tatelkus Indian Reserve 28, other nearby residents, local communities or other users of the area who could be affected by an accident or malfunction;</p>	Section 3, 7.4, 10
	<p>b) the types of accidents and malfunctions requiring notification by the Holder and the timeframe of notifications (including updates subsequent to the initial notification) to those identified in paragraph a);</p>	Section 7.1; Section 5.1 Table 7-1

<p>c) information to be included in the notifications required by paragraph b), including but not limited to:</p> <p>i) information on the accident or malfunction, including types and quantities of substances released, location of releases, duration of releases, and potential impacts caused by the release;</p> <p>ii) any health advisories;</p> <p>iii) remedial action being taken by the Holder including measures to avoid similar occurrences; and</p> <p>iv) details of subsequent monitoring related to the accident or malfunction;</p>	Section 7.3
<p>d) the manner by which those identified in paragraph a) will be notified by the Holder of an accident or malfunction;</p>	Section 7.2
<p>e) process for identifying and providing opportunities for those identified in paragraph a) to assist in response to the accident or malfunction;</p>	Section 7.6
<p>f) identification of any types of accidents and malfunctions that are not addressed in other plans, programs or other documents required by this Certificate or in provincial requirements for the Project, and mitigation measures to address potential adverse effects arising from those accidents or malfunctions; and</p>	N/A; all accidents and malfunctions are included in the MERP.
<p>g) requirements for the Holder to manage the risk of, monitor and report on Project Vehicle-related accidents, including but not limited to identifying</p> <p>i) response measures for fires or explosions involving Project Vehicles;</p> <p>ii) safety measures to be followed by drivers of Project Vehicles; and</p> <p>iii) safety and emergency response equipment to be incorporated into Project Vehicles.</p>	Section 7.7
<p>The Holder must provide this draft plan that was developed in consultation with EMPR, NHA, ENV, FLNRORD, and Aboriginal Groups to FLNRORD, EMPR, ENV, NHA, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Schedule required by Condition 10 of this Certificate.</p> <p>The plan, and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, Closure, and Post-Closure, and to the satisfaction of the EAO.</p>	BW Gold is providing this draft of the AMCP to the parties identified in the condition for review and comment.

Appendix B Concordance with Federal Decision Statement (April 15, 2019)

Table B- 1 Federal Environmental Assessment Decision Statement Conditions and Location in the Accidents and Malfunctions Administration and Communications Plan

Condition #	Requirement	Location in the Plan
2.14	The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.11 and 2.13, the offsetting plan(s) referred to in condition 3.11, the compensation plan referred to in condition 8.18 and, if required, condition 5.3, the whitebark pine management plan referred to in condition 8.20, the communication plans referred to in conditions 6.15 and 10.5, the reports related to accidents and malfunctions referred to in conditions 10.4.2 and 10.4.3, the schedules referred to in conditions 11.1 and 11.2, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of decommissioning of the Designated Project. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.	Section 8
10.1	The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects. The measures taken by the Proponent shall include measures to prevent dam breaches, water treatment plant failures or shutdowns.	Table 5-1
10.2	The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.	This draft of the AMCP is provided to Indigenous Groups for review and comment.
10.3	The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an accident and malfunction response plan in relation to the Designated Project. The accident and malfunction plan shall include;	The accident and malfunction response plan is incorporated into the AMCP, see references below.
	10.3.1 the types of accidents and malfunctions that may cause adverse environmental effects; and	Table 5-1
	10.3.2 the measures to be implemented in response to each type of accident and malfunction referred to in condition 10.3.1 to mitigate any adverse environmental effects caused by the accident or malfunction, including response plans for dam breaches, water treatment plant failures or shutdowns.	Table 5-1; Section 7.5
10.4	In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall immediately implement the measures appropriate to the accident or malfunction referred to in condition 10.3.2 and shall:	Table 5-1
	10.4.1 notify, as soon as possible, Indigenous groups and relevant authorities of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. For the notification to Indigenous groups and the Agency, the Proponent shall specify:	Table 7-1
	10.4.1.1 the date when and location where the accident or malfunction occurred;	

	<p>10.4.1.2 a summary description of the accident or malfunction; and</p> <p>10.4.1.3 any substances potentially released into the environment as a result of the accident or malfunction and the quantities released for each substance, if available.</p>	
	<p>10.4.2 submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include:</p> <p>10.4.2.1 a detailed description of the accident or malfunction and of its adverse environmental effects;</p> <p>10.4.2.2 a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;</p> <p>10.4.2.3 any view(s) from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects and the measures taken by the Proponent to mitigate these adverse environmental effects;</p> <p>10.4.2.4 a description of any potential residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; and</p> <p>10.4.2.5 details concerning the implementation of the accident or malfunction response plan referred to in condition 10.3.</p>	Section 8.1
	<p>10.4.3 submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes a description of the changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 10.4.2. The report shall include all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 10.4.2.3 were received by the Proponent.</p>	Section 8.1
10.5	<p>The Proponent shall develop a communication plan in consultation with Indigenous groups. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:</p> <p>10.5.1 the types of accidents and malfunctions requiring the Proponent to notify the respective Indigenous groups;</p>	Section 7.1; Section 5.1 Table 5-1
	<p>10.5.2 the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups to assist in the response to the accident or malfunction; and</p>	Section 7.2, Section 7.6
	<p>10.5.3 the contact information of the representatives of the Proponent that the Indigenous groups may contact and of the representatives of the respective Indigenous groups to which the Proponent provides notification.</p>	Section 7.4, Appendix C

Appendix C Accidents and Malfunctions Call-Out Sheet

Call-out sheet provided separately.

The listed individuals represent users of the area who could be affected by an accident or malfunction related to groundwater. This information is relevant in the event that groundwater wells are impacted and notification is required.

Non-BW Gold owned water licenses within 30 kilometers of the mine site are provided in Table C-1.

C- 1 Water Licences within 30 Kilometers of the Mine Site

Type	Licence #	Registered Owner	Use	Contact ¹
Groundwater Well	121688	Canadian Forest Products Ltd.	Commercial and Industrial	Prince George Sawmill 250-962-4700
	119368	Canadian Forest Products Ltd.	Commercial and Industrial	
	95996	TTM Resources	Water Supply System	TTM Resources (General) 604-685-1144
	113343	Lhoosk'uz Dené Nation	Unknown	Neil Gauthreau Natural Resource Manager 250-992-3290
	113351	Lhoosk'uz Dené Nation	Water Supply	
	98638	Kluskus First Nation	Water Supply System	
	98643	Kluskus First Nation	Water Supply System	
	98647	Kluskus First Nation	Water Supply System	
	N/A	Mills Ranch	Unknown	Wayne Kennedy Ranch Manager 250-570-8097

Notes:

1. Water licence holders are contacted only when necessary, such as in cases of accidents or malfunction