



Blackwater Gold Project

Country Foods and Socio-economic Conditions Follow-up Program

August 2022

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ACRONYMS AND ABBREVIATIONS

Aboriginal Groups or Indigenous Nations	Ulkatcho First Nation, Lhoosk'uz Dené 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 M#19-01)
BW Gold	BW Gold Inc.
BC	British Columbia
Blackwater or Project	Blackwater Project or Blackwater Gold Project
BW Gold	BW Gold LTD.
CM	Construction Manager
CEO	Chief Executive Officer
CFSEC Report	Country Foods and Socio-economic Conditions Report
COO	Chief Operating Officer
CSFNs	Carrier Sekani First Nations
DS	Decision Statement
EA	Environmental assessment
EAC or Certificate	Environmental Assessment Certificate
EAO	Environmental Assessment Office
EM	Environmental Manager
EMC	Environmental Monitoring Committee
EMS	Environmental Management System
EPCM	Engineering, Procurement and Construction Management
EDRR	Early Detection Rapid Response
FSR	Forestry Service Road
FUP	Follow-up Program
IAAC	Impact Assessment Agency of Canada
Indigenous Groups or Aboriginal Peoples	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stelat'en First Nation, Nazko First Nation, Skin Tyee Nation, Tsilhqot'in Nation, Métis Nation British Columbia, and Nee-Tahi-Buhn Band (as defined in the Project's federal Decision Statement)
km	Kilometre

LDN	Lhoosk'uz Dené Nation
MNBC	Métis Nation British Columbia
Mtpa	Million tonnes per annum
NFN	Nazko First Nation
NTBB	Nee-Tahi-Buhn Band
NWFN	Nadleh Whut'en First Nation
OCAP	Ownership, Control, Access and Protection
Project	Blackwater Gold Project
SFN	Saik'uz First Nation
Skin Tyee	Skin Tyee Nation
StFN	Stellat'en First Nation
TK	Traditional Knowledge
TLU	Traditional Land Use
TN	Tsilhqot'in Nation
t	Tonnes
UFN	Ulkatcho First Nation
VP	Vice President

1. INTRODUCTION

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.

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

Major mine components include a tailings storage facility, 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 (TN). The Kluskus and Kluskus-Ootsa FSRs and Project transmission line cross the traditional territories of Nadleh Whut'en First Nation (NWFN), Saik'uz First Nation (SFN), and Stelat'en First Nation (StFN; collectively, the Carrier Sekani First Nations) as well as the traditional territories of the Nazko First Nation (NFN), Nee Tahi Buhn Band (NTBB), Cheslatta Carrier Nation and Yekooche First Nation (EAO 2019a).

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, ending when the Open Pit has filled and the TSF is allowed to passively discharge to Davidson Creek, and the Post-closure phase is 46+ years.

The Project received Environmental Assessment Certificate #M19-01 (EAC) on June 21, 2019 (EAO 2019c) under the *Environmental Assessment Act* (2002) and a Decision Statement (DS) on April 15, 2019 (CEA Agency 2019a) under the *Canadian Environmental Assessment Act, 2012* approving the Blackwater Project, with conditions.

Condition 6.13 of the DS requires the Project proponent to develop a FUP as follows:

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the socio-economic conditions of Indigenous Peoples as a result of changes to access, availability and quality of country foods.

The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.

This document describes the Country Foods and Socio-economic Conditions Follow-up Program (FUP) to address the federal condition.

1.1 Purpose and Objectives

Indigenous groups have and continue to hunt, trap, fish, and gather country foods. Central to the health of country foods is the availability and quality of water. Water and country foods are critical to the diet of Indigenous peoples and harvest practices supports socio-economic conditions including knowledge transfer, enhances community member's well-being and supports physical fitness.

As described in Section 1.1.1, the Environmental Assessment (EA) used proxy data linked to moose hunting and concluded that no significant adverse effects to moose were anticipated by the Project, and as such, the Project would not result in residual effects to food security. The anticipated outcome of "no effects to food security" will be verified through the monitoring activities outlined in this FUP.

The purpose of the FUP is to monitor and adaptively manage potential adverse effects on the socio-economic conditions of Indigenous groups as a result of changes to access, availability and quality of country foods due to the Project components and activities.

The objectives of the FUP are to:

- *Enable the Proponent to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the socio-economic conditions of Indigenous Peoples as a result of changes to access, availability and quality of country foods (Condition 6.13 of the DS);*
- *Identify levels of environmental change relative to baseline conditions for access, availability and quality of country foods (Condition 2.5.4 of the DS); and*
- *Comply with Artemis Gold's commitments to Indigenous rights.*

1.1.1 Environmental Assessment Conclusions

The following summarizes the conclusions of the environmental assessment prepared by the CEA Agency.

The Project's environmental assessment (EA) considered the potential effects of changes to the access and quantity of country foods, commercial land use, and future land use options for Indigenous groups. The EA determined there would be no interactions between the Project and socio-economic conditions for NFN, TN, Métis Nation British Columbia (MNBC), and NTBB, and did not consider them further in the assessment (ERM 2016).

The assessment for NWFN, StFN, SFN, LDN, UFN and Skin Tyee Nation considered the potential for project-related changes to the environment to reduce the amount of country foods available to Indigenous households due to reduced access, availability, and knowledge related to country foods. The potentially affected Indigenous communities currently consume country foods, and experience food insecurity with respect to both store-bought and country foods. By reducing the abundance and distribution of country foods sources and potentially increasing the effort required to obtain them, the Project may result in decreased access to safe and nutritious country foods. This could have a corresponding effect on the cost of living for Indigenous peoples because they may need to spend more on store-bought food or on travel to obtain country foods (CEA Agency 2019b).

The EA utilized the analysis of effects from the Project on hunting success of moose as a proxy for food security. Based on a conclusion of no significant adverse effects from the Project to moose, the EA did not find any residual effects to food security from changes in the ability to hunt moose. In its Assessment Report, the Canadian Environmental Assessment Agency concluded that Indigenous peoples may be more susceptible to changes to food insecurity and cost of living. Although changes from the Project to moose harvesting may be relatively minor, it only represents one pathway of potential effect. Monitoring effects of the Project on moose populations, and for unanticipated effects on food security, is required to

confirm the proponent's understanding of potential effects to socio-economic conditions, and inform potential adaptive management actions (CEA Agency 2019b).

In addition to the conclusions prepared by the CEA Agency, Aboriginal Groups (LDN and UFN, and the CSFNs) prepared Part C reports that describe the Project's potential effects on the Aboriginal title, rights, and interests. These reports provide information regarding how each Aboriginal group defined impacts, evaluated the severity of said impacts and evaluated the risks to their communities as a result of the impacts. Through consultation, BW Gold understands that Indigenous groups have differing perspectives on CEA Agency's conclusions. The Part C reports have been referenced to refine this draft Country Food FUP.

1.2 Legislation and Guidance Documents

1.2.1 Legislation

Federal and provincial legislation applicable to Indigenous socio-economic conditions includes the *Impact Assessment Act* and *United Nations Declaration on the Rights of Indigenous Peoples Act*.

1.2.2 Guidance Documents

There are few examples of mining and other projects that have successfully implemented monitoring to assess changes to country foods. The FUP has been informed by the following studies:

- First Nations Food, Nutrition and Environment Study (FNFNES): Results from British Columbia (2008/2009; Chan et al 2011).
- Blackwater Mine and the Collaborative Moose Health Monitoring Program. A MITACS Internship Report (Lis 2016).
- First Nations Population Health and Wellness Agenda (First Nation Health Authority and Office of the Provincial Health Officer 2019).
- A Guideline for Conducting Health Impact Assessment for First Nations in British Columbia, Canada (Commissioned by: Tsimshian Environmental Stewardship Authority, 2018).

1.3 Linkages to Other Management and Monitoring Plans

The FUP is linked to the following plans:

- Country Foods Monitoring Plan (CFMP; EAC Condition 41) monitoring results (e.g., concentration of metals in air, water, soil, fish tissue, vegetation and berries) will inform the FUP with respect to potential changes to quality of country foods. Changes in the visual quality of country foods (based on inspection by the naked eye) may be related factors other than metal concentrations, such as parasites or diseases.
 - The CFMP is linked to the Aquatic Effects Monitoring Plan (AEMP) which identified parameters that will be sampled in water. It is also linked to the Air Quality and Fugitive Dust Management Plan (AQDMP) which includes parameters or conditions for monitoring as well as visual monitoring of fugitive dust.
- Community Effects Monitoring and Management Plan (CEMMP; EAC Condition 37) includes a feedback mechanism that enables land users, individuals and communities to submit comments and complaints regarding the Project, including concerns relating to their ability to access gathering, trapping and hunting areas, changes in availability of country foods and/or changes in the quality of country foods. As described in the CEMMP, comments and complaints submitted through the feedback mechanism are registered and acknowledged in a timely manner.

The CEMMP also outlines BW Gold's approach for monitoring anticipated socio-economic effects including changes to regional and community services supporting education, health, emergency services, social services, and community and family well-being. Monitored socio-economic effects outlined in this FUP are intended to be complementary to and not duplicative of the CEMMP. Notwithstanding, data from the CEMMP monitoring will inform BW Gold's understanding of changes to socio-economic effects as they pertain to changes in country foods harvesting activities.

- **Aboriginal Group Monitor and Monitoring Plan (AGMMP; EAC Condition 17)** provides terms of reference for Aboriginal monitors who will participate in monitoring and reporting activities throughout the life of mine. Aboriginal Group Monitors may also be involved in the implementation of this FUP, for example, through data collection and validation of the 2022 Country Foods and Socio-economics Conditions Report (CFSEC Report; Section 4.1) and Ongoing Monitoring (Section 4.2).
- **Wildlife Mitigation and Monitoring Plan (WMMP; EAC Condition 23)**: provides mechanisms for wildlife sightings, interactions, and incidents to be reported by the Project and will support an understanding of wildlife species presence in the area of the Project.
- **Mine Water and Discharge Management Plan (MSDP)**: provides monitoring program for surface water, groundwater, and seepage water quantity and quality within the proposed permitted area and discharge points over the Life of Mine. The plan is designed to provide an early detection system and identify trends in surface water and groundwater quality so that potential impacts to the receiving environment can be investigated, mitigated, and avoided.

1.4 Monitoring Area

The spatial scope of this FUP monitoring corresponds to the study area presented in Figure 1-1.¹ It incorporates the CFMP study area and linear components of the Project with respect to country foods access, availability and quality. With respect to monitoring potential changes to socio-economic conditions emerging from changes to country foods conditions, the FUP monitoring area includes the Local Study Area (LSA) from the Community Effects Monitoring and Management Plan (CEMMP) as it pertains to populated communities². Additionally, the most populated UFN reserves are included in this monitoring area³.

¹ The monitoring area surrounding the linear corridors is 1.5 km on either side, for a total of 3 km. This is the same distance that was used in the Further Assessment of Potential Effects on Current Aboriginal Use (ERM, 2016).

² The CEMMP LSA overlaps with the traditional territories of LDN, UFN, NFN, NWFN, StFN, SFN, 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 communities) are: Vanderhoof; Fraser Lake; LDN reserves (Kluskus 1, Tatelkus 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).

³ Squinas 2 and Ulkatcho.

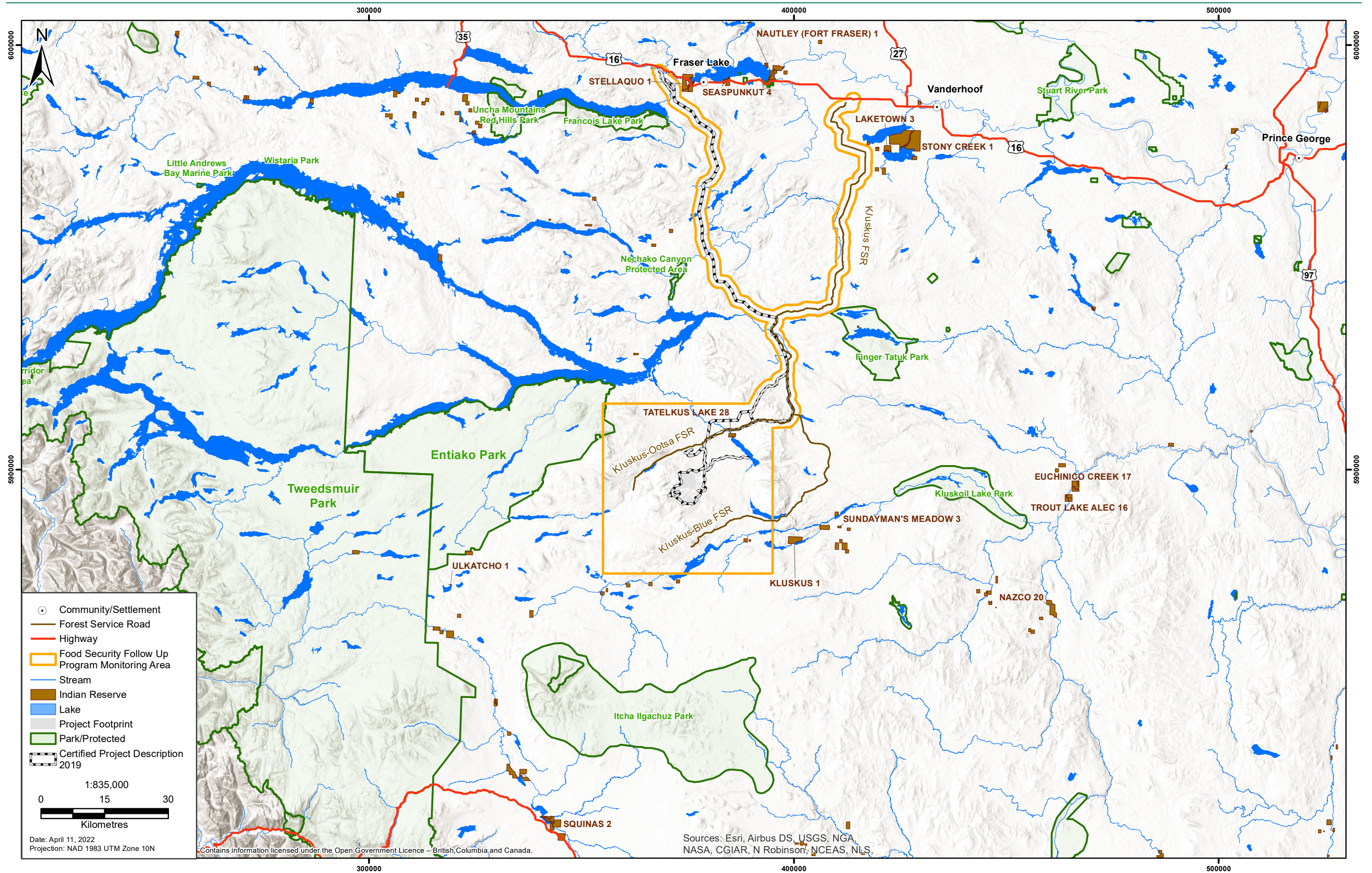


Figure 1-1: Follow-up Program Monitoring Area

2. ENGAGEMENT AND CONSULTATION

BW Gold is meeting regularly with LDN, UFN and CSFNs regarding the draft development of monitoring and management plans for the Project, as well as facilitating opportunities for Indigenous groups to meet with subject matter experts regarding responses to comments on the draft plans.

BW Gold presented a PowerPoint overview of the draft plan to LDN and UFN on February 14, 2022. Discussion during the presentation addresses a range of comments including, but not limited to consideration for perceived effects, importance of proactively addressing impacts to country foods, preliminary list of species being monitored, and the importance of the different levels of risk presented by different impacts. BW Gold received LDN and UFN comments on the draft presentation on February 16, 2022.

BW Gold presented a PowerPoint overview of the draft FUP to the CSFNs on March 4, 2022 and discussed the preliminary list of species being monitored and shared experiences related to sampling and monitoring programs.

BW Gold circulated a draft version of this FUP to LDN, UFN, CSFNs, Skin Tyee Nation, T̓silhqot'in Nation, Métis Nation British Columbia, and Nee-Tahi-Buhn Band on February 18, 2022 by email. A draft of the FUP was shared with the NFN on April 14, 2022. LDN and UFN provided comments on the draft FUP on March 10, 2022. BW Gold discussed revisions to the FUP with LDN and UFN on an Environmental Monitoring Board call (April 14, 2022), with a particular focus on discussion of the proposed socio-economic components, requested by the Nations following their initial review of their FUP, that would be monitored as part of the FUP. Input received through discussion as well as responses to comments have supported the revisions to this FUP. The revised draft of the FUP was provided to Indigenous groups in August 2022.

In June 2022, BW Gold engaged LDN and UFN to discuss workshops, focus groups and/or key information interviews proposed to review, update, and validate country foods and socio-economic conditions to be documented in the CFSEC Report. This approach is, and continues to be, BW Gold's desired approach to implement the FUP, recognizing the importance of community lived experience and perspectives in shaping the understanding of current conditions.

In consideration of LDN and UFN's current capacity limitations to participate in workshops, focus groups and/or key information interviews, the CFSEC Report is being prepared based on secondary sources (see Footnote #9). Monitoring of this FUP (Section 4) will rely on data collection (Table 4-2) and will be complemented by adaptive management measures (Section 5) based on experiences and perspectives of Indigenous groups, when and if information is available.

A draft of the 2022 CFSEC Report will be provided to Indigenous groups by email for review, and input that is provided will be incorporated into the baseline conditions and ongoing monitoring. Based on requests by Indigenous groups, BW Gold is interested in participating in workshops to support the CFSEC Report, and ongoing monitoring.

Once the draft FUP is submitted to the IAAC (and Indigenous groups) in accordance with DS Condition 2.8, there is an opportunity for further review by Indigenous groups. The timeline for comments will be determined after the draft FUP is submitted based on input from all reviewers. BW Gold will receive, consider, and respond to all comments received from reviewers.

At the completion of the draft FUP review, a Version 1.0 of the program will be completed and issued that incorporates all changes made to the draft FUP during the review and is compliant with the requirements under the DS.

3. DEFINITIONS

This FUP is focused on understanding any changes (real or perceived) to country foods access, availability and quality. The definition of, and relationship between access, availability and quality is illustrated in Figure 3-1.

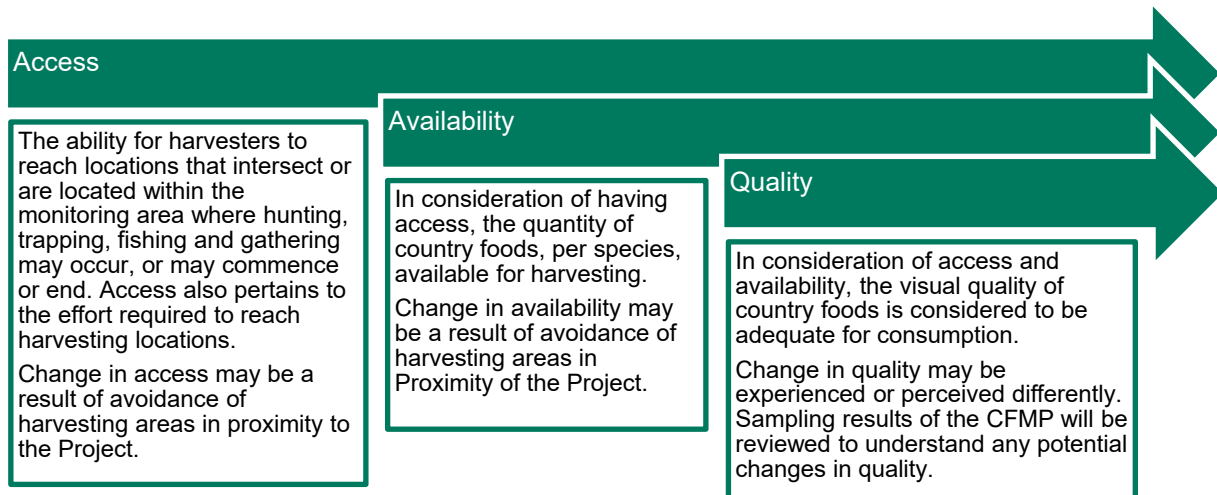


Figure 3-1: Definitions and Interrelationship of Country Foods Access, Availability and Quality

In consideration of the layered relationships between country foods access, availability and quality, the FUP will be informed by the following definitions and assumptions:

- **Access** to country foods pertains to the ability to reach locations that intersect or are located within the monitoring area (Figure 1-1), where hunting, trapping, fishing and gathering may occur, or may commence or end. Changes from country foods harvesting conditions in 2022 could include:
 - Change in access to country foods harvesting locations due to spatial overlap with the Project footprint or interaction with a Project-related activity, such as obstructions of roads, trails, and waterways.
 - Change in effort (e.g., time, expense and/or risk) to access alternate harvesting areas as a result of the Project. This may relate to Project-related traffic delays resulting in additional time to undertake harvesting. Based on information provided by Indigenous groups, it may relate to a change in effort to access an alternate harvesting location due to real or perceived impacts to country foods. Based on information provided by Indigenous groups, it may relate to measures taken to prepare for or avoid risks to access harvesting areas (e.g., risks related to new river crossings to access alternate harvesting areas).
 - Change in access to country foods harvesting due to avoidance of areas that interact or areas influenced by Project activities and components. This may relate to areas that are avoided due to real or perceived impacts of contamination, avoidance of areas due to safety concerns related to Project traffic, or avoidance of areas with increased use by non-Indigenous harvesters. Information provided by Indigenous groups will refine BW Gold's understanding of the level of avoidance of the area.

- **Availability** of country foods refers to the quantity of country foods, per species within the area. Changes from country foods harvesting conditions in 2022 could include:
 - Change in wildlife harvest success due to reduced wildlife presence due to Project impacts.⁴
 - Change in wildlife harvest success due to increased access by non-Indigenous harvesters (i.e., increased competition).
 - Change in wildlife harvest success due to increased encounters with sick or unhealthy wildlife species.
 - Change in fish harvest success due to Project impacts on fish and aquatic resources.⁵
 - Change in plant and berry harvesting success due to Project impacts.⁶
 - Change in wildlife, fish and plant/berry harvesting success due to avoidance harvest areas because of real or perceived concerns of country foods quality.
- **Quality** of country foods relies on a qualitative assessment of the visual appearance of country foods, and also considering input from Indigenous groups regarding their perception of changes to the quality of country foods. For the purpose of this plan, changes to visual quality may include:
 - Change to visual appearance of harvested wildlife (e.g., quality of coat such as length and thickness, observations of parasites on skin/coat, observations of patches of missing fur species girth, observation of any skeleton protrusions like ribs or spine).
 - Change to visual appearance of fish or fish meat (e.g., presence or absence of abnormalities).
 - Change to visual appearance of vegetation (e.g., presence of dust, wilting, change in spatial extent of a species/change in plant community).

With respect to quality, the FUP may be informed by results of the CFMP, for example in the case that concentrations of metals are detected in fish species where there are also indications of visual defects. The assessment does not predict that the Project will result in changes to tissue quality, however environmental changes in soil, water, fish tissue, or diet (plant) quality along with a trend of increasing tissue concentrations in species, could potentially be an indirect Project effect.

Additionally, BW Gold's feedback mechanism (as described in the CEMMP) may be used by harvesters to provide input and concerns about the quality of country foods. Notwithstanding, for the purpose of this draft FUP, the assessment of change is stand-alone and relies on results of visual inspections and other input from Indigenous groups regarding their perceptions of the quality of country foods.

BW Gold has identified the approaches and sources of information for monitoring the species included in this FUP (Appendix D). Notwithstanding, in recognition of the importance of the experience of country foods harvesting, input from Indigenous groups is important for the success of this FUP. BW Gold will invite Indigenous groups to provide information regarding country foods and socio-economic conditions, as described in Section 4.1 and 4.2 of this FUP. Invitations to participate in this FUP data collection and monitoring will be provided by email and during ongoing engagement (e.g., through Environmental Monitoring Board [EMB] meetings). BW Gold will consider any input from Indigenous groups that is received and use adaptive management approaches to refine the FUP over the life of mine (Section 5).

⁴ Potential Project impacts to wildlife include: vegetation clearing resulting in habitat loss and alteration, mortality from increased vehicle collisions, increased predation and hunting pressure, sensory disturbance resulting in changes in wildlife movement patterns and changes in population dynamics resulting from altered predator-prey relationships.

⁵ Potential Project impacts to fish include: changes in water quantity and water quality, effects on fish and fish habitat due to mortality, changes in fish health, habitat loss and isolation, and changes in stream habitat due to changes in stream flow.

⁶ Potential Project impacts to vegetation include: vegetation clearing, dust deposition and introduction of invasive species.

3.1 Socio-economic Conditions

This FUP aims to understand the “*accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the socio-economic conditions of Indigenous Peoples as a result of changes to access, availability and quality of country foods*” (DS 6.13).

Harvesting activities and country foods play “a key role in maintaining diverse cultures, languages, heritages and identities — in short, in the mental, emotional, spiritual and physical well-being of Indigenous Peoples” (Turner, Plotkin and Kuhnlein 2013: 37).

Recognizing the broad interconnections between country foods and socio-economic conditions, BW Gold has identified socio-economic components to be monitored within this FUP. Efforts have been made to identify sources of publicly available information and/or to limit reliance on personal or health related data. By email and through ongoing engagement, BW Gold has invited Indigenous groups to provide information regarding their perceptions of changes to socio-economic conditions that may be emerging because of changes to country foods harvesting. BW Gold will invite Indigenous groups to participate in data collection and monitoring of socio-economic conditions, and also recognizes that due to sensitivity of personal information (e.g., health and mental well-being), information may not be available.

The following section identifies the socio-economic conditions (and perceptions thereof) that BW Gold will monitor as part of this FUP.

■ Food Security

- There is potential that a change in country foods access, availability and/or quality may result in a change to perceptions of food security.

■ Health and Trust in Country Foods

- There is potential that a change in access to traditional food harvesting locations may result in perceptions of changes to health (e.g., change in amount of store bought/processed food, change in levels of physical activity).
- There is potential for changes in country foods harvesting to affect perceptions of and trust in country foods consumption. This change, in turn, has potential to result in changes to mental and/or emotional well-being (e.g., changes in trust of land resulting in frustration, depression).

■ Culture

- There is potential that a change in country foods harvesting results in a change in culture, language, and knowledge transfer (e.g., knowledge transfer and participation at culture camps).

Table 4-2 identifies the mitigations, indicators and sources of information to support monitoring changes in the socio-economic conditions linked to this FUP. In recognition of the importance of the experience of country foods harvesting, input from Indigenous groups is critical to the success of implementing monitoring associated with this FUP. BW Gold will invite Indigenous groups to share information regarding changes to socio-economic conditions.

4. APPROACH

The following section outlines the approach for establishing country foods harvesting conditions in 2022 (pre-construction activities included in Major Works and pre-operations), and annual FUP monitoring. This approach aims to be collaborative with Indigenous groups and respectful of their time and availability, considering the various programs and plans in place for the Project.

BW Gold has been engaging with LDN and UFN (e.g., through EMB meetings, email invitations) to participate in data collection and analysis (Section 2). In consideration of current capacity, BW Gold will share the draft 2022 CFSEC Report by email for their review, and data and input will be incorporated into this FUP and ongoing monitoring.

BW Gold will continue to invite Indigenous groups to participate in the monitoring of the FUP, and through adaptive management, additional or revised information will be incorporated into the FUP. Information shared with BW Gold will be managed in a manner that protects the confidentiality of participants and meets the data principles of Ownership, Control, Access and Possession (OCAP) (First Nations Information Governance Centre, 2014).

4.1 Understanding Conditions for Country Foods and Socio-economic Conditions (2022 Country Foods and Socio-economic Conditions Report)

The development of the CFSEC Report will support identifying environmental changes over time, as required by DS 2.5.4. Information and perceptions of Indigenous groups will be used to understand current conditions, when and if such information is provided.

The 2022 Country Foods and Socio-economic Conditions Report (CFSEC Report) is intended to:

- Validate and identify country foods of importance, based on Table 4-1⁷;
- Validate and update information related to country foods access (per species listed in Table 4-1), such as harvesting locations (by type of country foods), current access routes by Indigenous group (e.g., road, trail, water), and anticipated changes, and existing and anticipated barriers to harvesting access;
- Validate and update information related to country foods availability (per Table 4-1 species), such as typical harvest in a season, per species, as well as anticipated changes to harvest levels (including a discussion of why the changes are anticipated);
- Understand country foods consumption pattern information when and if provided by Indigenous groups, which, if and when made available, will be used to update future human health risk assessments completed by BW Gold;
- Understand current perceptions of country foods quality (per species listed in Table 4-1) when and if provided by representatives of Indigenous groups (e.g., harvesters, Elders), discuss anticipated changes (real or perceived) to country foods quality as a result of the Project as well as discussion of potential changes in consumption levels as a result of perceived effects of the Project to harvested species;
- Understand and validate current reliance on country foods and perception of food security in consideration of access to country foods and store bought food;

⁷ Information presented in Table 4-1 focuses on the species proposed for monitoring in this FUP. The information in Table 4-1 has been taken from the tables in Appendix B, which were prepared during the EA as part of the assessment on Current Use of Land and Resources for Traditional Purposes (ERM 2016). The absence of information about species use presented in Table 4-1 is not intended to mean there is no use of the species by a First Nation. The FUP baseline intends to validate and update information presented in Table 4-1.

- Understand current levels of physical activity associated with harvesting activities and the relationship between country foods harvesting and wellness; and
- Understand changes to culture, for example in relation to changes to culture camp activities, locations, programming and participation, as appropriate.

Table 4-1: Species to be Monitored as Part of the FUP

Species	Identified / Included in the CFMP	Identified / Included in the WMMP
Plant and Berries		
Black huckleberry	Yes	
Blueberry	Yes	
Hudson Bay Tea/Labrador Tea	Yes	
Mushrooms		
Poplar bark		
Soapberry	Yes	
Aquatic Species		
Kokanee salmon	Yes	
Rainbow trout	Yes	
Whitefish	Yes	
Wildlife		
Beaver		Yes
Black bear (fat)		Yes
Grouse	Yes	Yes
Moose		Yes

The following describes the data collection and compilation planned prior to Major Works with the intention of establishing current conditions to be monitored as part of this FUP. Figure 4-1 summarises the approach and approximate timeline for the implementation of the 2022 CFSEC Report.

- BW Gold will compile existing information to be validated and updated by each Indigenous group. Existing information about country foods access, availability and quality may be obtained from traditional knowledge/land use reports⁸ or other nation-specific reports or input.⁹ This information will be mapped in relation to the monitoring area (Figure 1-1). BW Gold will offer focus groups or workshops with Indigenous groups to validate, and as needed update, this information. As part of the

⁸ Traditional Land Use/Traditional Knowledge studies prepared for the Project include: Ethnohistory of Lhoosk'uz Dene Nation Traditional Territory (Dewhurst 2013); Traditional Land Use and Ecological Knowledge of the Proposed New Gold Inc. Blackwater Project, Final Report (DM Cultural Services Ltd. 2013); Stellat'en First Nation Land and Resource Use Study Report for New Gold Inc., October 2014 (Triton 2014); Traditional Land and Occupancy Study for the New Gold Blackwater Project, (Thomas 2015); Skin Tyee Traditional Land Use Study for New Gold Inc.'s Proposed Blackwater Project (DM Cultural Services Ltd. 2015); Nadleh Whut'en First Nation Knowledge and Use Report Non Confidential Report (Firelight Group 16); Assessment of Impacts of New Gold's Proposed Blackwater Gold Project on the Aboriginal Title, Rights and Interests of the Nazko First Nations (Upper Fraser Fisheries Conservations Alliance, 2017), Skin Tyee First Nation Traditional Land Use Study for New Gold Inc.' Proposed Blackwater Project (DN Cultural Services Ltd, 2015).

⁹ This may include incorporating results from sampling programs from the moose sampling study by LDN in 2016 (Lis, 2016).

discussion, BW Gold and Indigenous groups may choose to refine the families, keyoh/keyah holders, land users that are engaged in data validation and update in an effort to incorporate the knowledge of land users that frequent areas in and around the FUP monitoring area.¹⁰ This process may include mapping, quantifying harvest levels, by species (and location, where possible), and discussion/descriptions of the visual quality of foods (e.g., photographs of harvested species).

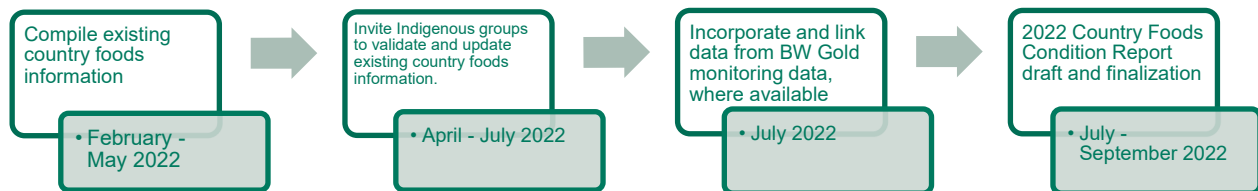


Figure 4-1: Schedule for the 2022 Country Foods and Socio-economic Conditions Report

Compiling and linking relevant data collected as part of other monitoring programs associated with this FUP. This includes, for example: Incorporating the sampling results from the 2022 update to the CFMP.

A draft of the 2022 CFSEC Report (Section 6.1) will be shared by email with Indigenous groups for input prior to finalization. Indigenous groups will be invited to provide comments within 30 days of receiving the draft 2022 CFSEC Report. In future, BW Gold may use community meetings (e.g., with interactive poster boards) for people to engage with the baseline information and provide input.

The 2022 CFSEC Report will guide the data collection and analysis that is monitored on an annual basis, as described in the following section.

4.1.1 Country Foods

Data collection efforts will include a focus on the country foods identified in Table 4-1 and those identified within the monitoring area using the following information:

- Federal Assessment report (2019);
- Part C Assessments prepared by LDN and UFN, and the CSFNs;
 - Assessment of Impacts on the Carrier Sekani First Nations' Aboriginal Title, Rights, and Interests from the Blackwater Gold Project (Part C) (2019);
 - Lhoosk'uz Dené Nation and Ulkatcho First Nation Part (Keefer Ecological Services Ltd, 2019);
- Top ten country foods consumed by BC First Nations as reported in the 2011 First Nations Food, Nutrition and Environment Study (Chan et al, 2011). The top ten foods have been included from ecozones 4 and 5 of the study, which both overlap the Project area;¹¹ and
- Species that will be monitored as part of the CFMP, with the exclusion of willow and sedge.¹²

¹⁰ To date, Indigenous groups have not provided feedback regarding the involvement of groups, families, keyoh/keyahs in the data validation process.

¹¹ The only exception to the Chan et al (2011) top ten species is the inclusion of laver seaweed. Laver seaweed is not included in the FUP as access, availability and quality of seaweed is not expected to be impacted by the Project.

¹² Willow and sedge are not included in the FUP because they are not known to be consumed by humans. Both species are commonly sampled in vegetation programs and willow is thought to be a hyperaccumulator of metals

Information from resources provided by Indigenous groups (e.g., a digital copy of the Ulkatcho Food and Medicine Plants Book) will be requested, and when provided, will be reviewed and collated as part of this current conditions study.

Table 4-1 presents species used by each Indigenous group based on information presented in the Current Land and Resource Use for Traditional Purposes memorandum (ERM 2016) prepared during the EA review. A list of wildlife, fish and plant species identified in traditional land use/traditional knowledge studies provided by Indigenous groups prior to April 2016 is included in Appendix B.

4.2 Ongoing Follow-up Monitoring

4.2.1 *BW Gold Management and Monitoring Plan Data Compilation*

Monitoring data from the following plans will inform the FUP:

- CFMP: As part of this plan, BW Gold is committed to continuing to work with Indigenous groups to refine the CFMP sampling program design, including consideration of additional sampling locations based on consultation with Indigenous elders. While this will not enable the identification of Project -related effects on country foods quality, it will provide an understanding of the quality of country foods that are actually being consumed and can be used to provide calibration of site-specific food chain models used to predict tissue concentrations in country foods. For the purposes of the FUP, monitoring results for vegetation, fish and wildlife will be reviewed. This information will be used to understand any **changes to the quality** of country foods, as monitored in this FUP.
- Wildlife Mitigation and Monitoring Plan (WMMP): The WMMP annual report will be reviewed for location of wildlife sightings, interactions, and incidents reported by the Project. This information will be used to understand any **changes to availability** of wildlife species used for country foods.
- Aboriginal Group Monitor and Monitoring Plan (AGMMP): The AGMP outlines that Aboriginal monitors will regularly report on their monitoring observations. Aboriginal Group Monitor reports may include data related to wildlife sightings, the quality of country foods species, changes to access of culturally significant locations (e.g., trails used to access harvesting locations), and photographs. Data from these monthly reports will support BW Gold's understanding of **changes to access, availability and quality of country foods**. Aboriginal Group Monitors may also be involved in the implementation of this FUP, for example, through data collection and validation of the 2022 CFSEC Report (Section 4.1) and Ongoing Monitoring activities (Section 4.2).
- CEMMP: Comments and concerns regarding **changes to access, availability and quality of country foods** reported through BW Gold's community feedback mechanism will be reviewed as it provides a source of data for the FUP.

MSDP: provides monitoring program for surface water, groundwater, and seepage water quantity and quality within the proposed permitted area and discharge points. Results of water quality monitoring will be used to understand **changes in country foods access, availability and quality**.

4.2.2 *Compilation of Pre-existing Community Level Data*

BW Gold will offer to work with Indigenous groups regarding the receipt of detailed or summary-level information that pertaining to country foods access, availability and quality. This may include, for example, information from ongoing monitoring (e.g., guardian programs, health-related studies).

4.2.3 *Country Foods Data Verification and Updates*

BW Gold will offer to engage with Indigenous groups annually to validate and update data pertaining to country foods and socio-economic conditions as follows:

- **Nation-specific workshops and/or focus groups:** BW Gold will offer to facilitate Nation-specific workshops and/or focus groups to discuss country foods data compiled from the previous year. The workshop and/or focus groups will include an opportunity to validate information that has been compiled (Section 4.2.1 and Section 4.2.2) as well as provide new and updated information and perspectives. The workshops and/or focus groups will include a spatial component of data collection where Indigenous group members can identify and detail country foods access and availability. BW Gold will encourage participants to bring photographs or other media relevant to discuss and understand the visual quality of country foods. BW Gold will offer to work with Indigenous groups to arrange the workshops and/or focus groups, including receiving input from the Indigenous groups regarding approach(es), participants, timing and materials. Workshops and/or focus groups be conducted with community members, harvesters, keyoh/keyah holders, and Elders and as appropriate, or affected land users may be engaged.
- **Semi-structured key informant interviews:** BW Gold will offer to arrange key informant interviews with representatives of LDN, UFN, NWFN, StFN, SFN, NFN to understand and further refine their understanding of changes to country foods access, availability and quality. Through this process, BW Gold will obtain both quantitative and qualitative information. A draft Country Foods Interview Guide (Appendix C) outlines questions related to country foods, harvesting and perceptions of the quality of harvested foods. BW Gold proposes the following interviews to be implemented based on the cooperation with Indigenous groups:
 - Annual interviews with Aboriginal Group Monitors (e.g., monitors from LDN, UFN, NWFN, StFN, SFN, NFN employed in relation to EAC Condition 17); and
 - Annual interviews with representatives of LDN, UFN, NWFN, StFN, SFN, NFN, as needed to supplement and/or validate information obtained from the Aboriginal Group Monitors.

The timing of this engagement will be scheduled in discussion with Indigenous groups, and in consideration of community events and harvesting seasons.

Data collection will follow appropriate measure to protect the privacy of participants.

4.2.4 *Methodology of Monitoring and Analysis*

BW Gold will invite Indigenous groups to participate in data collection and to develop the data analysis approach.

Changes to country foods access, availability and quality will be assessed in relation to the results of the 2022 CFSEC Report. Table 4-2 outlines indicators that will be compiled and analyzed to understand changes and trends over time in relation to the current conditions. The indicators and data will be validated during the development of the 2022 CFSEC Report, as many of the indicators will rely on input from Indigenous groups (e.g., site specific or spatial information to refine indicators).

Analysis of the result of data monitoring may include workshops and focus groups aimed at reviewing the data, validating any changes or trends and summarizing results.

In the case that the follow-up monitoring identifies an impact of the Project to access, availability and quality of country foods, BW Gold will identify potential or probable links between Project activities and the changes to determine the potential for a cause-and-effect relationship.

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

Table 4-2: Indicators for Monitoring Country Food and Related Socio-economic Conditions

Category	Monitored Effect	Project Mitigation Measures	Monitored Indicator(s)	Data Source
Country Food Access	Change of access to harvesting area(s) due to spatial overlap or intersection with FUP monitoring area	<ul style="list-style-type: none">■ Use defined transportation routes, to the extent possible,¹³ and will be publicly disclosed so that land and road users are aware of the Project's transportation activities■ 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 on the Project's website (EAC Condition 42), and will be posted at least 30 days prior to the planned activities■ Promote and implement the Community Feedback Mechanism, described in the CEMMP■ Notification (e.g., by letter, phone call, text or discussion with the Environmental Monitoring Board [EMB]) on the locations of access roads in relation to the transmission line construction, maintenance and decommissioning■ Implement the Community Feedback Mechanism (EAC Condition 37), facilitating real-time understanding and response to concerns or comments related to changes in access to harvesting locations	<ul style="list-style-type: none">■ Based on secondary data/studies, area or number of location(s), level of use by harvesters and importance of berry/vegetation harvesting areas lost due to spatial overlap with Project footprint or interaction with Project activities; areas include but are not limited to Mount Davidson, areas near the transmission line, Kluskus FSR and Holy Cross Road■ Number of meetings (e.g., EMB, community members, other) where Indigenous groups are asked about or share perceptions related to changes in access to country foods (Table 4-1) as a result of the Project■ Number of complaints raised in relation to removed access of country foods (Table 4-1), received through the Community Feedback Mechanism	<ul style="list-style-type: none">■ Ongoing monitoring activities (interviews and focus groups, if and when coordinated in collaboration with Indigenous groups)■ Aboriginal Group Monitor monthly reports■ Community Feedback Mechanism
Country Food Access	Change in effort (time, expense and risk) required to access alternate harvesting areas	<ul style="list-style-type: none">■ Communicate schedules with Indigenous land users regarding Project activities in advance of their occurrence, as described in the CEMMP■ Implement the Community Feedback Mechanism (EAC Condition 37), facilitating real-time understanding and response to concerns or comments related to changes in access to harvesting locations	<ul style="list-style-type: none">■ Compliance with notification and sharing of Project schedule■ Number of hours (per day, per month) the FSRs are closed due the Project■ Number of hours (per day, per month) that FSRs are one lane traffic due to the Project■ Number of meetings (e.g., EMB, community members, other) where Indigenous groups are asked about or share perceptions related to changes in effort to access country foods (Table 4-1) as a result of the Project■ Number of complaints raised in relation to increased effort to access country foods (Table 4-1) harvesting locations, received through the Community Feedback Mechanism	<ul style="list-style-type: none">■ Ongoing monitoring activities (interviews and focus groups, if and when coordinated in collaboration with Indigenous groups)■ Aboriginal Group Monitor monthly reports■ Community Feedback Mechanism

¹³ Changes to the route may be required, for example, in the case of road construction or a traffic accident, unrelated to the Project.

Category	Monitored Effect	Project Mitigation Measures	Monitored Indicator(s)	Data Source
Country Food Availability	Change in availability of country foods ¹⁴	<ul style="list-style-type: none">■ Implement a no fishing, no hunting (including no trapping), no gathering and no firearms policies for Project employees and contractors while traveling to and from the mine, residing on the mine site or while on company Business (WMMP)■ Project traffic that complies with BW Gold’s internal speed limits on Kluskus and Kluskus-Ootsa FSR and the proponent controlled road■ Implement moose surveys every 5 years■ Implement wildlife sighting reporting■ Follow the “least risk” windows for wildlife species■ Maintain escape pathways at wildlife corridors along roadways■ Along the transmission line, maintain vegetation at a height that would minimize predator sight lines■ Manage vegetation to reduce attractiveness of roadsides for wildlife■ Implement intake screens and design outlet pipes to prevent fish entry for the freshwater supply system■ Meet effluent discharge <i>Environmental Management Act</i> permit limits■ Implement fish and fish habitat follow-up programs■ Minimize and avoid clearing old growth forest, mixed wood forest, wetlands, riparian areas, and lichen-rich stands■ Monitor and manage invasive species■ Employ Aboriginal Group Monitors over the life of the Project to assist with environmental and other monitoring■ Implement the Community Feedback Mechanism (EAC Condition 37), facilitating real-time understanding and response to concerns or comments related to changes in availability of country foods	<ul style="list-style-type: none">■ Compliance with the no fishing, no hunting (including no trapping), no gathering policy■ Compliance with BW Gold’s speed limits on roads■ Compliance with breaks in snowbanks using trail breaks■ Compliance with effluent discharge requirements■ Number of Project vehicle-wildlife strikes, per month and by location■ Presence and type of wildlife interactions in the FUP monitoring area, based on Aboriginal Group Monitor reports, and winter track survey results■ Presence and type of aquatic species in the FUP monitoring area, based on review of intake screens■ Presence and type of invasive species in the FUP monitoring area■ Number of meetings (e.g., EMB, community members, other) where Indigenous groups are asked about or share perceptions related to changes in the availability of country foods (Table 4-1) as a result of the Project■ Number of complaints raised in relation to the availability of country foods (Table 4-1), received through the Community Feedback Mechanism	<ul style="list-style-type: none">■ Ongoing monitoring activities (interviews and focus groups, if and when coordinated in collaboration with Indigenous groups)■ Community Feedback Mechanism■ Monitoring results from BW Gold management plans■ Aboriginal Group Monitor monthly reports
Country Food Quality ¹⁵	Change in quality of country foods	<ul style="list-style-type: none">■ Establish wildlife cameras at salmon spawning streams in the wildlife RSA, that may record the condition/quality of wildlife■ Implement a CFMP to monitor species that represent pathways for metals concentrations in country foods including plants, mammals and fish■ Meet effluent discharge <i>Environmental Management Act</i> permit limits■ Reduce fugitive dust through restricting Project vehicle speeds and reducing idling■ Employ Aboriginal Group Monitors over the life of the Project to assist with environmental and other monitoring (EAC Condition 17)■ Implement the Community Feedback Mechanism (EAC Condition 37), facilitating real-time understanding and response to concerns or comments related to changes in availability of country foods	<ul style="list-style-type: none">■ Results of CFMP Monitoring Plan Annual Report■ Compliance with effluent discharge requirements■ Observations and feedback on appearance of wildlife (Table 4-1), as reported in Aboriginal Group Monitor monthly reports■ Observations and feedback on appearance of vegetation (Table 4-1) as reported in Aboriginal Group Monitor monthly reports■ Number of meetings (e.g., EMB, community members, other) where Indigenous groups are asked about or share perceptions related to changes in the quality of country foods (Table 4-1) as a result of the Project■ Number of complaints received through the Community Feedback Mechanism in relation to the quality of country foods (Table 4-1) in the proximity to the Project■ Changes in perception of country foods quality information provided by Indigenous groups if and when made available	<ul style="list-style-type: none">■ Ongoing monitoring activities (interviews and focus groups if and when coordinated in collaboration with Indigenous groups)■ Community Feedback Mechanism■ Monitoring results from BW Gold management plans■ Aboriginal Group Monitor monthly reports

¹⁴ Reduced availability of country foods, as defined in Section 4.1.3, includes reduced wildlife harvest success, reduced fish catch success, reduced plan/berry harvest success within the study area, as well as reduced success harvesting as a result of avoidance of harvesting in areas within proximity to the Project.

¹⁵ The CFMP includes approaches for monitoring the presence of contaminants of potential concern (COPCs) which have potential to change the quality of country foods. As such, this Plan does not include measured indicators related to contaminants of potential concern.

Category	Monitored Effect	Project Mitigation Measures	Monitored Indicator(s)	Data Source
Food Security	Change in perception of food security due to change in access, availability and/or quality of country foods	<ul style="list-style-type: none">■ Implement a CFMP to monitor species that represent pathways for metals concentrations in country foods including plants, mammals and fish■ Meet effluent discharge <i>Environmental Management Act</i> permit limits■ Reduce fugitive dust through restricting Project vehicle speeds and reducing idling■ Employ Aboriginal Group Monitors over the life of the Project to assist with environmental and other monitoring (EAC Condition 17)■ Implement the Community Feedback Mechanism (EAC Condition 37), facilitating real-time understanding and response to concerns or comments related to changes in country foods	<ul style="list-style-type: none">■ BC Inflation Rate■ Results of CFMP Monitoring Plan Annual Report■ Compliance with effluent discharge requirements■ Number of meetings (e.g., EMB, community members, other) where Indigenous groups are asked about or share perceptions related to changes in food security as a result of the Project■ Number of complaints received through the Community Feedback Mechanism in relation to the quality of country foods (Table 4-1) in the proximity to the Project■ Feedback on changes in perception of food security, as reported in focus groups/workshops■ Changes in perception of foods consumption pattern and/or perceptions of food security information provided by Indigenous groups if and when made available	<ul style="list-style-type: none">■ Chan study and related First Nation Food, Nutrition and Environment Studies■ Annual First Nation Population Health and Wellness Agenda Report First Nation Regional Health Survey (food insecurity indicator)■ Ongoing monitoring activities (interviews and focus groups if and when coordinated in collaboration with Indigenous groups)■ Community Feedback Mechanism■ Monitoring results from BW Gold management plans
Health	Changes in levels of physical activity associated with country foods harvesting	<ul style="list-style-type: none">■ Use defined transportation routes, to the extent possible, and will be publicly disclosed so that land and road users are aware of the Project's transportation activities■ 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■ Provision of a schedule and maps where Project activities will take place on the Project's website (EAC Condition 42), and will be posted at least 30 days prior to the planned activities■ Timely communicating and sharing schedules with Indigenous land users regarding Project activities in advance of their occurrence, as described in the CEMMP■ Implement a no fishing, no hunting (including no trapping), no gathering and no firearms policies for Project employees and contractors while traveling to and from the mine, residing on the mine site or while on company Business (WMMP)	<ul style="list-style-type: none">■ Compliance with notification and sharing of Project schedule■ Number of hours (per day, per month) the FSRs are closed or one lane, due to the Project■ Number of meetings (e.g., EMB, community members, other) where Indigenous groups are asked about or share perceptions related to changes in the amount of physical activities associated with harvesting as a result of the Project■ Number of complaints raised in relation to increased effort to access country foods (Table 4-1) harvesting locations, received through the Community Feedback Mechanism	<ul style="list-style-type: none">■ Monitoring results from BW Gold management plans■ Annual First Nation Population Health and Wellness Agenda Report/First Nation Regional Health Survey (Physical activity indicator)■ Ongoing monitoring activities (interviews and focus groups if and when coordinated in collaboration with Indigenous groups)■ Community Feedback Mechanism
Health	Change in health associated with perceptions of country foods and/or trust in consumption of country foods	<ul style="list-style-type: none">■ Provide Aboriginal cultural awareness training delivered to all new employees (e.g., training completed during first week of employment and ongoing through crew talks)■ Implement a CFMP to monitor species that represent pathways for metals concentrations in country foods including plants, mammals and fish■ Meet effluent discharge <i>Environmental Management Act</i> permit limits■ Reduce fugitive dust through restricting Project vehicle speeds and reducing idling■ Employ Aboriginal Group Monitors over the life of the Project to assist with environmental and other monitoring (EAC Condition 17)	<ul style="list-style-type: none">■ Number of times public health care services were accessed per community, total and by key service category■ Number of meetings (e.g., EMB, community members, other) where Indigenous groups are asked about or share perceptions related to changes in health as a result of the Project■ Number of complaints raised in relation to change in perceptions of country foods (Table 4-1) and/or trust in consumption of country foods associated with Project-related activities and/or impacts, received through the Community Feedback Mechanism■ Changes in perception of foods consumption pattern information provided by Indigenous groups, if and when made available	<ul style="list-style-type: none">■ Monitoring results from BW Gold CEMMP (Northern Health and Health Service Pressure related data)■ Ongoing monitoring activities (interviews and focus groups if and when coordinated in collaboration with Indigenous groups)■ Community Feedback Mechanism■ Annual First Nation Population Health and Wellness Agenda Report/First Nation Regional Health Survey (mental and emotional well-being indicator)

Category	Monitored Effect	Project Mitigation Measures	Monitored Indicator(s)	Data Source
Culture	Change in culture due to changes in country foods harvesting associated with Project activities, components or effects	<ul style="list-style-type: none">■ Provide Aboriginal cultural awareness training delivered to all new employees (e.g., training completed during first week of employment and ongoing through crew talks)■ Use defined transportation routes, to the extent possible, and will be publicly disclosed so that land and road users are aware of the Project's transportation activities■ 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■ Provision of a schedule and maps where Project activities will take place on the Project's website (EAC Condition 42), and will be posted at least 30 days prior to the planned activities■ Timely communicating and sharing schedules with Indigenous land users regarding Project activities in advance of their occurrence, as described in the CEMMP■ Implement a no fishing, no hunting (including no trapping), no gathering and no firearms policies for Project employees and contractors while traveling to and from the mine, residing on the mine site or while on company Business (WMMP) Implement a CFMP to monitor species that represent pathways for metals concentrations in country foods including plants, mammals and fish■ Meet effluent discharge <i>Environmental Management Act</i> permit limits■ Reduce fugitive dust through restricting Project vehicle speeds and reducing idling■ Employ Aboriginal Group Monitors over the life of the Project to assist with environmental and other monitoring (EAC Condition 17)	<ul style="list-style-type: none">■ Compliance with notification and sharing of Project schedule■ Results of CFMP Monitoring Plan Annual Report■ Compliance with effluent discharge requirements■ Compliance with the no fishing, no hunting (including no trapping), no gathering policy■ Compliance with BW Gold's speed limits on roads■ Number of Project vehicle-wildlife strikes, per month and by location■ Presence and type of wildlife interactions in the FUP monitoring area, based on Aboriginal Group Monitor reports, and winter track survey results■ Presence and type of aquatic species in the FUP monitoring area, based on review of intake screens■ Presence and type of invasive species in the FUP monitoring area■ Number of meetings (e.g., EMB, community members, other) where Indigenous groups are asked about or share perceptions related to changes in culture as a result of the Project■ Number of complaints raised in relation to access and experience of cultural activities (e.g., cultural camps), received through the Community Feedback Mechanism	<ul style="list-style-type: none">■ Monitoring results from BW Gold■ Ongoing monitoring activities (interviews and focus groups if and when coordinated in collaboration with Indigenous groups)■ Community Feedback Mechanism■ Annual First Nation Population Health and Wellness Agenda Report/First Nation Regional Health Survey (cultural wellness indicator)■ Feedback from Aboriginal Group Monitors

4.2.5 *Frequency, Timing, and Duration of Monitoring*

In response to input on the draft FUP, BW Gold proposes that the FUP monitoring and analysis will occur on a seasonal basis (fall and spring) during the construction period and first two (2) years of operations. BW Gold will invite Indigenous groups by email to participate in, and support, monitoring data collection and analysis, and will coordinate the approach based on responses received from Indigenous groups. Monitoring will then occur on a yearly basis throughout operations. BW Gold will solicit input from Indigenous groups regarding the scheduling of the seasonal and annual monitoring.

This FUP will remain in effect from construction through to decommissioning. If, after five years of operations, the monitoring program indicates that there is no observable effect (as predicted in the EA), the program may be discontinued following consultation with the Agency and Indigenous groups. During these discussions, BW Gold, the Agency and Indigenous groups, may determine the need for recommencing the monitoring one year prior to decommissioning and during the closure phase.

5. ADAPTIVE MANAGEMENT AND FOLLOW-UP PROGRAM

The FUP is a living document that will evolve over time in response to the results of the monitoring program, changing conditions or development at the Project, updates to scientific methods, enhanced understanding of real and perceived impacts as associated changes to land use behaviours, and through consultation and discussions with Indigenous groups, regulators, or other stakeholders. This process of continuous improvement with changing conditions is referred to as adaptive management.

Conditions 2.5 and 2.6 in the federal DS identify requirement for follow-up programs:

- “2.5 The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, have a Qualified Professional, where such a qualification exists for the subject matter of the follow-up program, determine, as part of the development of each follow-up program and in consultation with the party or parties being consulted during the development, the following information:*
- 2.5.1 the follow-up activities that must be undertaken by a qualified individual;*
 - 2.5.2 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program;*
 - 2.5.3 the scope, content, format and frequency of reporting of the results of the follow-up program;*
 - 2.5.4 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and*
 - 2.5.5 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.5.4 have been reached or exceeded.*
- 2.6 The Proponent shall update and maintain the follow-up and adaptive management information referred to in condition 2.5 during the implementation of each follow-up program in consultation with the party or parties being consulted during the development of each follow-up program.”*

Thus, an adaptive management framework has been incorporated into the FUP. Figure 5-1 identifies the components of the adaptive management framework.

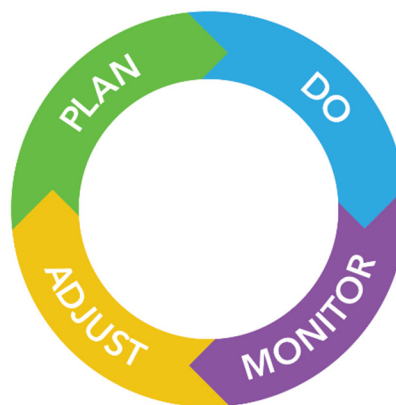


Figure 5-1: Adaptive Management Framework

Plan: Through invitations to Indigenous groups to collaborate, design of 2022 CFSEC Report described in Section 4.1 and the monitoring plan in Section 4.2.

Do: Implement 2022 CFSEC Report as described in Section 4.1.

Monitor: Implement monitoring described in Section 4.2. BW Gold will review and update the monitoring program, including the FUP over the life of the Project. This will include:

- Review of the monitoring program in terms of effectiveness in detecting level of environmental change;
- Recommendations provided by qualified individual and Indigenous groups on the monitoring plan; and
- Engagement tracking to record input from Indigenous groups.

Adjust: BW Gold will adjust the FUP approach based on results of ongoing engagement and implementation of the FUP. As described in Section 2, input received on an ongoing basis pertaining to the experience and perspectives of Indigenous groups country food uses in the FUP Monitoring area and socio-economic conditions will be considered to support monitoring and adaptive management of this FUP.

Additionally, the FUP defines qualitative and quantitative triggers to measure the level of change relative to current context conditions in order to determine whether mitigation measures need to be altered or additional mitigation measures need to be implemented (Table 5-1).

Management responses may include additional monitoring or studies, adjustment of existing mitigation measures, or identification and implementation of new mitigation measures. BW Gold will engage with Indigenous groups regarding proposed adjustments, as necessary, in relation to potential changes to access, availability and quality of country foods.

Table 5-1: Adaptive Management Triggers and Responses

Monitoring Trigger	Response
No effect (as predicted in the Application/EIS)	No action Continue monitoring program No change to mitigation measures
Low level effect Up to three (3) planned concurrent traffic disruptions lasting less than two (2) hours in a two (2) day period One (1) Project vehicle-moose collision in a one (1) year period Up to three (3) complaints regarding access, availability or quality of country foods and/or concerns related to socio-economic conditions emerging from impacts to country foods harvesting, received and recorded in BW Gold's Community Feedback Mechanism, in one season (i.e., three month period) Invasive plants are not increasing in distribution or no new invasive plants identified or no new plants on the provincial EDRR list identified in the invasive plant monitoring area Low-level trigger as defined in the CFMP for: <ul style="list-style-type: none"> ■ Metals in air ■ Metals in soil Medium-level trigger as defined for CFMP for: <ul style="list-style-type: none"> ■ Fish tissue metal concentrations ■ Metals in surface water ■ Plant and berry metal concentrations 	Low level action Inform Indigenous groups Identify potential causes of potential changes in access, availability or quality of country foods Monitor and communicate results of CFMP management responses associated with low-level triggers Evaluate if new mitigation measures are required

Monitoring Trigger	Response
<p>Medium level effect</p> <p>Between four (4) and eight (8) traffic disruptions (planned or unplanned), lasting more than two (2) hours over two (2) days</p> <p>Up to three (3) Project vehicle-moose collisions in one (1) year</p> <p>There is an increase in invasive plants distribution, and/or one (1) incidental invasive species observation and/or one (1) new plants on the provincial EDRR list identified in the invasive plant monitoring area</p> <p>Invasive plants are not increasing in distribution or no new invasive plants identified in the invasive plant monitoring area</p> <p>One (1) breach of compliance with effluent discharge requirements</p> <p>Between four (4) and nine (9) complaints regarding changes in access, availability or quality of country foods and/or concerns related to socio-economic conditions emerging from impacts to country foods harvesting, received and recorded in BW Gold's Community Feedback Mechanism, in one season (i.e., three month period)</p> <p>Medium-level trigger as defined in the CFMP for:</p> <ul style="list-style-type: none"> ■ Metals in air ■ Metals in soil <p>High-level trigger as defined in the CFMP for:</p> <ul style="list-style-type: none"> ■ Fish tissue metal concentration ■ Metals in surface water ■ Plant and berry tissue metal concentrations 	<p>Medium level action</p> <p>Inform Indigenous groups</p> <p>Identify potential causes of potential changes in access, availability or quality of country foods</p> <p>Monitor and communicate results of CFMP management responses associated with medium-level triggers</p> <p>Optimize existing mitigation and evaluate if new mitigation is feasible and how long it would take to implement</p> <p>Evaluate if new mitigation measures are required</p> <p>Engage Indigenous groups regarding pressure on community harvest/freezers</p>
<p>High level effect</p> <p>More than nine (9) traffic disruptions (planned or unplanned) lasting more than two (2) hours, over two (2) days</p> <p>More than three (3) Project vehicle-moose collisions in one (1) year</p> <p>More than one (1) breach of effluent discharge requirements</p> <p>More than ten (10) complaints regarding changes in access, availability or quality of country foods and/or concerns related to socio-economic conditions emerging from impacts to country foods harvesting, received and recorded in BW Gold's Community Feedback Mechanism, in one season (i.e., three month period)</p> <p>Incidental observations of invasive species with the potential to outcompete native vegetation, and/or incidental observation of any species listed on the provincial EDRR list within the Project area (not previously identified for monitoring/treatment/eradication)</p> <p>High-level trigger as defined in the CFMP for:</p> <ul style="list-style-type: none"> ■ Metals in air ■ Metals in soil 	<p>High level action</p> <p>Inform Indigenous groups</p> <p>Identify potential causes of potential changes in access, availability or quality of country foods</p> <p>Monitor and communicate results of CFMP management responses associated with high-level triggers</p> <p>Optimize existing mitigation and evaluate if new mitigation is feasible and how long it would take to implement</p> <p>Evaluate if new mitigation measures are required</p> <p>Engage Indigenous groups regarding pressure on community harvest/freezers</p> <p>Engage the First Nation Health Authority in relation to supporting country foods access, availability and quality initiatives in the Project's socio-economic local study area (as described in the CEMMP)</p>

6. REPORTING

6.1 Current Context of Country Foods and Socio-economic Conditions Report

Prior to start of Major Works construction, BW Gold will prepare a report that summarizes the current context for country foods access, availability and quality and socio-economic conditions discussed in Section 4.1. The draft report will be provided to Indigenous groups by email for their review prior to the start of Major Works.

At the time of developing this updated draft of the FUP, the CFSEC Report has been developed based on secondary information.

In alignment with the practices outlined in the Aboriginal Group Engagement Plan, BW Gold will invite Indigenous groups by email, and where requested, followed up by a phone call¹⁶, to review the report. Comments and responses will be documented in a tracking table.

BW Gold will canvas each Indigenous Group by email, and where requested, followed up by a phone call, for potential meeting dates to discuss the draft 2022 CFSEC Report, with an effort to hold the meeting prior to start of Major Works.

6.2 Decision Statement Annual Reporting and Information Sharing

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

DS Condition 2.11 requires:

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

- 2.11.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;*
how the Proponent complied with condition 2.1;
- 2.11.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation, including a rationale for how the views have, or have not, been integrated;*
- 2.11.4 the information referred to in conditions 2.5 and 2.6 for each follow-up program;*
- 2.11.5 the results of the follow-up program requirements identified in conditions 3.14, 3.15, 3.16, 4.5, 5.5, 6.11, 6.12, 6.13, 6.14, 8.18.6, 8.20.5, 8.21, and 8.22 if required;*
- 2.11.6 any update made to any follow-up program in the reporting year;*
- 2.11.7 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.9 and rationale for why mitigation measures were selected pursuant to condition 2.5.4; and*
- 2.11.8 any change(s) to the Designated Project in the reporting year.”*

¹⁶ Requested by CSFNs.

DS Condition 2.12 requires: *“The Proponent [BW Gold] will provide the draft annual report to Indigenous groups, no later than June 30 following the reporting year to which the annual report applies. BW Gold will consult Indigenous groups on the content and findings in the draft annual report.”*

DS Condition 2.13 requires: *“The Proponent [BW Gold], in consideration of any comments received from Indigenous groups pursuant to condition 2.12 shall revise and submit to the Agency [Impact Assessment Agency of Canada] and Indigenous groups a final annual report, including an executive summary in both official languages, no later than September 30 following the reporting year to which the annual report applies.”*

DS Condition 2.14 requires: *“The Proponent [BW Gold] shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.11 and 2.13.*

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

DS Condition 2.15 requires: *“When the development of any plan is a requirement of a condition set out in this Decision Statement, the Proponent [BW Gold] shall submit the plan to the Agency and to Indigenous groups prior to construction, unless otherwise required through the condition.”*

DS Condition 6.15 requires: *“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a plan to communicate the results of the follow-up program referred to in conditions 6.11, 6.12, 6.13 and 6.14 in plain language to Indigenous groups and relevant authorities. The communication plan shall include the procedures to communicate, including the frequency of communication.”*

To satisfy this condition, the plain language report (Section 6.3) will be prepared and provided by email, and where requested¹⁷, by phone, to Indigenous groups at the same time as the FUP Annual Report. Additional communication methods or approaches may also be used, in consultation and collaboration with Indigenous groups, to disseminate results of the FUP Annual Report.

6.3 Plain Language Report

In addition to the report described in Section 6.2, a summary-style infographic in a manner understandable to a lay audience will be provided by email at the same time as the report described in 6.2. The intent of this infographic summary will be to provide a high-level overview of the FUP monitoring data and results, and conclusions in an easier to understand, plain language format, as required by DS 6.15.

6.4 Data Management

Data collection will be undertaken in a manner that protects the confidentiality of participants and meets the data principles of Ownership, Control, Access and Possession (OCAP) (First Nations Information Governance Centre, 2014).

BW Gold's Environmental Manager (EM) is responsible for data management, reporting and records for the Project. BW Gold will maintain monitoring data in a database and entered in a standardized format and program that will allow for comparison over years. As required by DS Condition 2.15, monitoring data will be publicly available for 25 years following the end of decommissioning of the Project.

BW Gold will present the information in such a way that confidential or identifying information is not be shared.

¹⁷ Phone follow up has been requested by CSFNs.

7. PLAN REVISION

The plan will be revised in Q1 2023 to include: consideration of country foods data collection, changes in mitigation or monitoring methods and implementation, including adaptive management actions, and reporting undertaken in 2022.

Beyond the 2023 update, the plan will be reviewed annually and revised to include changes availability, mitigation or monitoring methods including adaptive management actions.


Updates of the plan will be provided to Impact Assessment Agency of Canada and Indigenous groups consultation on revisions.

8. QUALIFIED PERSON

The FUP has been prepared by a qualified individual who has over eight years of experience with socio-economic impact assessments, Indigenous and community engagement, and working with community and Indigenous knowledge holders for large projects in BC, Northwest Territories and Nunavut.

In accordance with DS Condition 2.5., this follow-up plan has been prepared by the following qualified individual:

Prepared by:

A handwritten signature in black ink, appearing to be 'Zoe Mullard', is written over a solid green horizontal line.

Zoe Mullard

Principal Consultant, ERM

9. REFERENCES

Legislation

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

Environmental Assessment Act, SBC 2018, c 51.

Impact Assessment Act, SC 2019, c 28.

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

Secondary Sources

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BC EAO. 2019b. *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*.

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- Turner, Plotkin and Kuhnlein. 2013. *Global environmental challenges to the integrity of Indigenous Peoples' food systems*. In *Indigenous Peoples' Food Systems and Well-being: Interventions and Policies for Healthy Communities*, pp. 23–38 [HV Kuhnlein, B Erasmus, D Spigelski et al., editors]. Rome: FAO and Centre for Indigenous Peoples' Nutrition and Environment.
- University of Ottawa, Université de Montréal, Assembly of First Nations. 2021. *Key Findings and Recommendations for Decision-makers. First Nations Foods, Nutrition and Environment Study*. October 2021.

APPENDIX A CONCORDANCE WITH FEDERAL ENVIRONMENTAL ASSESSMENT DECISION STATEMENT (APRIL 15, 2019)

Appendix A: Concordance with Federal Environmental Assessment Decision Statement (April 15, 2019)

Condition	Description	Location in Program
Condition 2.3 (General Conditions)	The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement: 2.3.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;	The draft FUP was provided to Indigenous Groups for review and comment on February 18, 2022.
	2.3.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time agreed upon with the party or parties being consulted, not less than 15 days, to prepare their views and information;	The draft FUP was provided to Indigenous Groups for review and comment in February 18, 2022.
	2.3.3 undertake a full and impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation;	To be completed, subject to receipt of comments on draft FUP. Section 2
	2.3.4 strive to reach consensus with Indigenous groups; and	To be completed, subject to receipt of comments on draft FUP. Section 2
	2.3.5 advise the party or parties being consulted on how the views and information received have been considered by the Proponent including a rationale for why the views have, or have not, been integrated. The Proponent shall advise the party or parties in a time period that does not exceed the period of time taken in 2.3.2.	To be completed, subject to receipt of comments on draft FUP. Section 2
Condition 2.4 (Consultation)	The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, determine and strive to reach consensus with each Indigenous group regarding the manner by which to satisfy the consultation requirements referred to in condition 2.3, including: 2.4.1 the methods of notification;	Section 2
	2.4.2 the type of information and the period of time to be provided when seeking input;	Section 2
	2.4.3 the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation; and	Section 2
	2.4.4 the period of time and the means by which to advise Indigenous groups of how their views and information were considered by the Proponent.	Section 2

Condition	Description	Location in Program
Condition 2.5 (Follow-up and Adaptive Management)	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, have a Qualified Professional, where such a qualification exists for the subject matter of the follow-up program, determine, as part of the development of each follow-up program and in consultation with the party or parties being consulted during the development, the following information: 2.5.1 the follow-up activities that must be undertaken by a qualified individual;	Section 8
	2.5.2 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program;	Section 4
	2.5.3 the scope, content, format and frequency of reporting of the results of the follow-up program;	Section 6
	2.5.4 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and	Section 5, Table 5-1
	2.5.5 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.5.4 have been reached or exceeded.	Section 5, Table 5-1
Condition 2.6 (Follow-up and Adaptive Management)	The Proponent shall update and maintain the follow-up and adaptive management information referred to in condition 2.5 during the implementation of each follow-up program in consultation with the party or parties being consulted during the development of each follow-up program.	Future requirement
Condition 2.7 (Follow-up and Adaptive Management)	The Proponent shall provide a draft of the follow-up programs referred to in conditions 3.14, 3.15, 3.16, 4.5, 5.5, 6.11, 6.12, 6.13, 6.14, 8.18.6, 8.20.5, 8.21, and 8.22, if required, to the party or parties being consulted during the development of each follow-up program for a consultation period of up to 60 days prior to providing follow-up programs pursuant to condition 2.8.	The draft FUP was provided to Indigenous groups for review and comment on February 18, 2022
Condition 2.8 (Follow-up and Adaptive Management)	The Proponent shall provide the follow-up programs referred to in conditions 3.14, 3.15, 3.16, 4.5, 5.5, 6.11, 6.12, 6.13, 6.14, 8.18.6, 8.20.5, 8.21, and 8.22, if required, to the Agency and to the party or parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update(s) made pursuant to condition 2.6 to the Agency and to the party or parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.	Future requirement

Condition	Description	Location in Program
Condition 2.9 (Follow-up and Adaptive Management)	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement: 2.9.1 conduct the follow-up program according to the information determined pursuant to condition 2.5;	Section 4
	2.9.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);	Section 4.5
	2.9.3 determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken in accordance with condition 2.9.2; and	Section 5, Table 5-1
	2.9.4 if modified or additional mitigation measures are required pursuant to condition 2.9.3, develop and implement these mitigation measures in a timely manner and monitor them in accordance with condition 2.9.2.	Future requirement
Condition 2.10 (Follow-up and Adaptive Management)	Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss the follow-up program with Indigenous groups and determine, in consultation with Indigenous groups, opportunities for their participation in the implementation of the follow-up program, including the analysis of the follow-up results and whether modified or additional mitigation measures are required, as set out in condition 2.9.	Section 2
Condition 2.11 (Annual Reporting)	The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out: 2.11.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;	Section 6.2
	2.11.2 how the Proponent complied with condition 2.1;	Section 6.2
	2.11.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation, including a rationale for how the views have, or have not, been integrated;	Section 6.2
	2.11.4 the information referred to in conditions 2.5 and 2.6 for each follow-up program;	Section 6.2
	2.11.5 the results of the follow-up program requirements identified in conditions 3.14, 3.15, 3.16, 4.5, 5.5, 6.11, 6.12, 6.13, 6.14, 8.18.6, 8.20.5, 8.21, and 8.22 if required;	Section 6.2
	2.11.6 any update made to any follow-up program in the reporting year;	Section 6.2
	2.11.7 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.9 and rationale for why mitigation measures were selected pursuant to condition 2.5.4; and	Section 6.2
	2.11.8 any change(s) to the Designated Project in the reporting year.	Section 6.2

Condition	Description	Location in Program
Condition 2.12 (Annual Reporting)	The Proponent shall provide a draft annual report referred to in condition 2.11 to Indigenous groups, no later than June 30 following the reporting year to which the annual report applies. The Proponent shall consult Indigenous groups on the content and findings in the draft annual report.	Section 6.2
Condition 2.13 (Annual Reporting)	The Proponent, in consideration of any comments received from Indigenous groups pursuant to condition, 2.12 shall revise and submit to the Agency and Indigenous groups a final annual report, including an executive summary in both official languages, no later than September 30 following the reporting year to which the annual report applies.	Future requirement
Condition 2.14 (Information Sharing)	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 6.2, Section 6.4
Condition 2.15 (Information Sharing)	When the development of any plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency and to Indigenous groups prior to construction, unless otherwise required through the condition.	Section 2
Condition 6.13	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse environmental effects of the Designated Project on the socioeconomic conditions of Indigenous Peoples as a result of changes to access, availability and quality of country foods. The Proponent shall implement the follow-up program from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.	All Sections
Condition 6.15	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a plan to communicate the results of the follow-up program referred to in conditions 6.11, 6.12, 6.13 and 6.14 in plain language to Indigenous groups and relevant authorities. The communication plan shall include the procedures to communicate, including the frequency of communication.	Section 6.3

APPENDIX B SPECIES USED BY INDIGENOUS GROUPS (ERM 2016)

Appendix B: Species Used by Indigenous Groups (ERM 2016)

Table B-1, B-2, and B-3 provide BW Gold's understanding of the use of different wildlife, fish and plant species by Indigenous group. The table was prepared during the EA as part of the assessment on Current Use of Land and Resources for Traditional Purposes (ERM 2016). The table was prepared prior to the provision of traditional land use information by NFN. No publicly available information was available for MNBC. As such, these groups are not represented in the table, but the absence of data is not intended to represent absence of use.

New information and validation of the information presented below will be undertaken as part of the current context study for the FUP.

Table B-1: Wildlife Species Used by Indigenous Groups

Species	LDN	UFN	SFN	StFN	NWFN	STN	NFN	NTB	TNG
Badger						X			
Bobcat						X		X	
Bear					X				
Brown						X			
Black Bear	X	X	X	X		X		X	X
Grizzly Bear	X	X		X	X	X			X
Beaver	X	X	X	X		X		X	X
Caribou (Woodland)	X	X	X	X	X	X			X
Cougar				X		X		X	X
Coyote	X	X				X		X	
Deer	X	X	X	X	X	X		X	X
Duck	X	X	X	X				X	X
Mallard				X					
Black				X					
Elk			X			X			X
Fisher	X	X			X	X		X	X
Fox	X	X				X		X	X
Frog						X			
Grebe (Horned)	X	X	X						
Goose		X	X	X				X	X
Canada				X					
Groundhog		X				X			
Grouse	X	X	X	X					X
Hare									X
Snowshoe				X				X	
Loons		X							X

Species	LDN	UFN	SFN	StFN	NWFN	STN	NFN	NTB	TNG
Lynx	X	X	X	X		X		X	X
Marten	X			X	X	X		X	
Marmot		X		X					X
Mink	X	X		X		X			X
Muskrat	X	X	X	X					X
Mountain Goat		X		X		X		X	X
Mountain Sheep						X			X
Mule Deer				X		X			X
Moose	X	X	X	X	X	X			X
Otter	X	X				X		X	X
Porcupine			X						X
Ptarmigan	X								X
Rabbit	X	X	X	X		X		X	X
Squirrel	X	X		X		X		X	X
Swans		X		X					X
Weasel	X					X		X	X
Western Toad						X			
Wild Chicken									X
Whitetail Deer						X			
Wolverine	X	X		X		X		X	X
Wolf		X		X	X	X		X	
Timber	X	X							

Table B-2: Fish Species Used by Indigenous Groups

Species	LDN	UFN	SFN	StFN	NWFN	STN	NFN	NTB	TNG
Arctic Grayling			X						
Brook Trout						X			
Bull Trout				X		X			
Burbot/Cod/Ling cod*	X	X	X	X		X		X	
Char			X			X		X	
Chinook Salmon		X		X		X			
Coho Salmon		X				X			
Cutthroat Trout						X			
Dolly Varden		X	X	X	X	X			
Kokanee Salmon*	X	X	X	X	X	X		X	
Lake Trout						X		X	
Northern Pike minnow*				X		X			

Species	LDN	UFN	SFN	StFN	NWFN	STN	NFN	NTB	TNG
Pacific Lamprey Eel						X			
Pink Salmon						X			
Prickly Sculpin						X			
Rainbow Trout*	X			X	X	X		X	
Salmon			X		X	X		X	
Slimy Sculpin*						X			
Sockeye Salmon		X		X		X			
Spotted Trout						X			
Steelhead		X			X	X			
Sturgeon		X	X	X	X	X		X	
Suckers (red long-nosed and white)*						X			
Suckers*	X	X		X		X		X	
Trout	X		X		X	X			
Whitefish*	X	X			X			X	
Minnows including chub, dace*				X		X			
Coarse fish*			X						
Carp		X							

Note: Species marked in with star (*) indicates they were captured in fish LSA and RSA of the Application/EIS for the Current Use of Land and Resources for Traditional Purposes.

Table B-3: Plant Species Used by Indigenous Groups

Species	LDN	UFN	SFN	StFN	NWFN	STN	NFN	NTB	TNG
Arrow-leaved Coltsfoot		X							
Avalanche Lily		X							
Balsam Fir								X	
Balsam Poplar		X				X			
Balsamroot									X
Bear Berry/Black Twinberry		X		X		X			
Beartooth									X
Berries (general)			X						X
Blackberry				X					
Black Currant		X							
Black Tree Lichen/Dog Hair	X					X			
Blueberry	X	X		X		X			X
Alaska		X							
Dwarf		X							

Species	LDN	UFN	SFN	StFN	NWFN	STN	NFN	NTB	TNG
Oval-leafed		X							
Bog Bill-berry		X							
Birch				X		X		X	
Paper		X							
Scrub									X
Bulrush				X					
Bunchberry		X				X			X
Canada Mint (Field Mint)		X							
Carrot/Parsley (family)				X					
Cattail				X					
Cherries (general)									X
Chokecherry				X		X			X
Corn Tubers									X
Cottonwood		X				X		X	X
Cow Parsnip	X	X				X			X
Cranberry				X		X			
Bog Cranberry		X							
Crowberry									X
Currants (black/red/green)				X	X	X			X
Devil's Club		X				X		X	
Dogwood									X
Douglas Fir									X
Fireweed				X	X	X		X	X
Food Plants (general)				X					X
Fungus		X							X
Gooseberry				X		X		X	X
Grouse berry								X	
Hawthorn									X
Hemlock		X							
Highbush Cranberry						X			
Horsetail				X					
Huckleberry	X			X	X	X			X
Black Huckleberry		X							
Hudson Bay Tea/ Labrador Tea		X		X		X		X	X
Indian Hellebore (Poison)		X							
Indian Tea		X				X			

Species	LDN	UFN	SFN	StFN	NWFN	STN	NFN	NTB	TNG
Indian Hellebore						X			
Juniper		X		X		X		X	X
Kinnikinnik	X	X		X		X			X
Lily (general)				X					X
Lily Pad									X
Lichen									X
Marsh Cinquefoil		X							
Medicinal Plants (general)				X					
Moss						X			
Mountain Alder		X		X					
Mountain Ash						X			
Mountain Carrots									X
Mushroom								X	X
Nodding Onion		X							
Pearly Everlasting		X							
Plantain				X					
Pine						X		X	X
Lodgepole Pine	X	X		X					X
Pine Mushroom		X							
Pipsissewa (Western Prince's Pine)		X							
Poison Berry						X			
Poplar						X		X	
Prickly Pear Cactus									X
Prickly Rose		X				X			
Pussy Willow								X	
Raspberry/Raspberry Bush	X	X		X	X	X			X
Red Alder/Mountain Alder						X			
Rhubarb		X				X		X	X
Rice-root (Indian Rice/Mission Bells)		X						X	
Roots (general)									X
Rosebushes		X			X	X			X
Rosehips/Roseberries						X		X	
Sage				X	X				
Saskatoon Berry	X	X		X	X	X			X
Seaweed				X					

Species	LDN	UFN	SFN	StFN	NWFN	STN	NFN	NTB	TNG
Scouring Rush (Horsetail/Goose Grass)		X							
Silverweed									X
Sitka Alder		X				X		X	
Skunkberry						X			
Skunk Cabbage									X
Soapberry	X	X		X	X	X		X	X
Spring Beauty (Mountain Potato)				X					X
Spiny Wood-Fern		X							
Spruce				X		X		X	X
Montane Spruce	X								
White Spruce	X	X							
Englemann Spruce	X	X							
Stinging Nettle		X						X	
Strawberry	X	X				X			X
Swamp Brush									X
Subalpine Fir	X	X		X	X	X			
Sunflower									X
Thimbleberry		X			X				X
Thistle						X			
Tiger Lily	X								
Tamarack				X		X			
Aspen					X				X
Trembling		X		X					
Twin Flower						X			
Viburnum Berry		X							
Wintergreen									
One-sided		X							
Pink or Large		X							
Whitebark Pine		X							
Water Parsnip		X							
Wild Celery	X								X
Wild Onion	X			X		X			X
Wild Rice						X			X
Wild Turnip		X							
Willow				X		X			X
Scouler's		X							

Species	LDN	UFN	SFN	StFN	NWFN	STN	NFN	NTB	TNG
Red Willow				X	X	X			
Willow Herb		X							
Woman's Medicine Plant ¹								X	
Yarrow		X		X		X			
Yellow Hemlock						X			
Yellow Tree Lichen		X		X					

SFN did not have any references to specific plant use in their TLUOS.

APPENDIX C COUNTRY FOOD AND SOCIO-ECONOMIC CONDITIONS INFORMATION DISCUSSION GUIDE EXAMPLE

Appendix C: Country Food and Socio-economic Conditions Information Discussion Guide Example

The following represents an example of the types of questions that may be used in a semi-structured interview or focus group to collect information about country foods harvesting and socio-economic conditions. A range of questions or discussion topics has been identified and the implementation of this guide or refinement of these questions can be developed collaboratively with Indigenous groups. In discussion with Indigenous Groups, BW Gold will refine the list of questions and structure of the data collection in consideration of the context (e.g., virtual setting, number of participants).

This guide may be refined and include tables, such as those exemplified in the *Community Ecosystem Monitoring Interview Questions* (Arctic Borderlands Ecological Knowledge Society, 2016), an example of a monitoring program, shared by UFN and LDN in April 2022.

Discussion topics marked with an asterisk (*) are suggested to be included in data collection for the 2022 CFSEC Report, in the event that focus groups, community meetings or interviews are arranged.

Context Setting

- In the past harvesting season, how much time/how many days did you spend on the land?
- What were your primary activities? Describe your harvesting activities?
- In the past season, how many days were spent:
 - Hunting?
 - Trapping?
 - Fishing?
 - Berry Picking?
- Do you have any general observations about your experience on the land in the last few months?
- What are you current perceptions of country foods?*
- What do you think is the impact of the Project on your country foods and harvesting experience?

Information about Water

Access:

- Where do you go to access water for drinking/consumption?
- What barriers exist to accessing locations for water used for consumption?
- Do you think these barriers will increase as a result of the Project activities or components?*
- Do you think there will be new barriers as a result of the Project?*
- Do you anticipate changes in routes or approaches to accessing water in consideration of Project components and activities?*
- Do you anticipate that any change in access will result in new or additional risks for you while on the land?*
- Have you experienced a change in risks associated with accessing water sources?
- Have you experienced changes in access to the areas you use for water consumption?

Availability:

- Do you anticipate any changes in water availability as a result of the Project?* If yes, where and why?

Quality:

- Do you anticipate any changes in water quality as a result of the Project?* If yes, where and why?
- Have you noticed any change in the appearance of water? Please describe.
- Have you noticed any change in the taste of water? Please describe.

General Observations:

- Do you have any concerns about changes to water access, availability or quality as a result of the Project? Please describe.

Information about Hunting and Trapping

Access:

- Describe where you hunt and/or where are the trails or areas where hunting occurs? (Locations to be noted on a map.)
- How much effort (time/resources such as money) do you spend on accessing harvesting areas, on average per season?
- What barriers exist to accessing hunting locations?
- Do you think these barriers will increase as a result of the Project activities or components?*
- Do you think there will be new barriers as a result of the Project?*
- Do you anticipate changes in routes or approaches to hunting areas in consideration of Project components and activities?*
- Do you anticipate that any change in access will result in new or additional risks for you while harvesting (e.g., are there new river crossings required as a result in changes to access)?*
- Have you experienced a change in risks associated with accessing hunting or trapping areas?
- Have you experienced changes in access to the areas you traditionally access for hunting?
- Where and when were the delays?
- How long were the delays?

Availability:

- What species are hunted as part of your diet?
- For each species, what is the seasonal and/or daily pattern for hunting? Or, in a year, how many of each species is harvested?
- How many harvesting trips (or person hours) are spent per season/year?
- How much of your harvest is contributed to the community harvest/community freezer?
- Were your households' hunting needs met this season?
- Do you anticipate any changes in species availability as a result of the Project?*
- If yes, where and why?
- Have you noticed any change in the number of wildlife / country foods when you are hunting?

- If yes, please describe the changes and any context as to why the changes are occurring.
- Have you experienced any changes in the amount of wildlife/country foods/meat available for you and/or your family, keyoh/keyah, or community? Please describe.

Quality:

- Do you anticipate any changes in species quality as a result of the Project?*
- If yes, where and why?
- Have you noticed any change in the appearance of wildlife or meat that you harvested? Please describe.
- Have you noticed any change in the taste of meat that you harvested? Please describe.
- Have you noticed any change in the taste of meat that you harvested? Please describe.

General Observations:

- Can you share any general observations or trends related to hunting activities and/or wildlife?
- Do you have any concerns about changes to access, availability or quality of harvested wildlife as a result of the Blackwater Project? Please describe.
- Do you have any suggestions for how BW Gold can address any concerns that have been raised?

Information about Fishing

Access:

- Where do you typically go to fish? (Locate on map provided.)
- What species are caught in these locations?
- How much effort (time/resources, such as money) do you spend on accessing fishing areas, on average per season?
- In the project area, are there specific sites that are important to you/your community? (Locate on map provided.)
- What barriers exist to accessing fishing locations?
- Do you think these barriers will increase as a result of the Project activities or components?*
- Do you think there will be new barriers as a result of the Project?*
- Do you anticipate that any change in access will result in new or additional risks for you while fishing (e.g., are there new river crossings required as a result in changes to access)?*
- Have you experienced a change in risks associated with accessing fishing locations?
- Do you anticipate changes in routes or approaches to fishing spots in consideration of Project components and activities?*
- Have you experienced changes in access to the areas you traditionally access for fishing? When, how long was the delay?

Availability:

- Of the fish caught (see above), was the harvest the same, less or more than in previous seasons at those locations?
- Do you anticipate any changes in species availability as a result of the Project?* If yes, where and why?
- Were your households' fishing needs met this season?
- Have you noticed a change in the number of fish you catch in the locations near the Project?
- How much of your harvest is contributed to the community harvest/community freezer?
- How you noticed any challenges for catching sufficient fish for yourself/family/community?

Quality

- Do you anticipate any changes in species quality as a result of the Project?* If yes, where and why?
- Have you noticed any change in the appearance of fish that you caught? Please describe.
- Have you noticed any change in the taste of fish that you caught? Please describe.

General Observations:

- Do you have any concerns about changes to access, availability or quality of fish as a result of the Blackwater Project? Please describe.
- Do you have any suggestions for how BW Gold can address any concerns that have been raised?

Information about Plant Gathering

Access:

- How much effort (time/resources such as money) do you spend on accessing gathering areas, on average per season?
- Are there areas where you gather plants/berries in the vicinity of the Blackwater Project? (Locate on map.)
- In the project area, are there specific plant harvesting/gathering sites that are important to you/your community? (Locate on map.)
- Are there any areas you avoid harvesting? If yes, why? Please describe.
- Have you experienced any delays or changes in access to plant/berry gathering areas?
- Where and when?
- How long was the delay?
- What barriers exist to accessing plant harvesting locations?
- Do you think these barriers will increase as a result of the Project activities or components?*
- Do you think there will be new barriers as a result of the Project?*
- Do you anticipate changes in routes or approaches to plant harvesting locations in consideration of Project components and activities?*
- Do you anticipate that any change in access will result in new or additional risks for you while harvesting plants or berries (e.g., are there new river crossings required as a result in changes to access)?*
- Have you experienced a change in risks associated with accessing plant harvesting areas?

- Are there any plant/berry harvesting areas that have been affected by the Blackwater Project?
(Please locate and describe.)

Availability:

- What plants and berries are harvested for food/nutrition? Where? (Locate on map provided.)
- For each plant/berry, what is the seasonal and/or daily pattern for harvesting?
- Do you anticipate any changes in species availability as a result of the Project?*
- If yes, where and why?
- Have you experienced a change in the amount of plants/berries that you harvest?
- Can you describe if any of this change is attributed to the appearance of plants or concerns about the environment where the plant is growing?

Quality

- Do you anticipate any changes in species quality as a result of the Project?*
- If yes, where and why?
- Have you noticed any change in the appearance of plants that you've harvested (or chosen not to harvest as a result of their appearance)?
- Have you noticed any change in the taste of plants that you harvested? Please describe.

General Observations:

- Do you have any concerns about changes to access, availability or quality of plant/berry gathering as a result of the Blackwater Project? Please describe.
- Do you have any suggestions for how BW Gold can address any concerns that have been raised?

Information about Food Security

- How much of your daily, weekly, monthly diet relies on country foods?
- How much of your food do you buy from the store? What are the types of food you are most likely to buy rather than harvest? Why?
- Does this amount/type of food you purchase change seasonally, and if so, how?
- Do you anticipate changes in consumption levels as a result of perceived effects of the Project to harvested species?*
- If yes, what changes do you anticipate and why?
- Have you changed your country foods consumption as a result of the Project?
- If yes, what changes have been made and why?
- Do you use the community freezer/community harvest?
- Has your level of reliance on community harvested foods changed in the last year?
- When you do not have access to these country foods, what do you consume?
- How often do you consume foods that are substitutes for country foods?
- Are these foods readily available in your community?

- Do you have any concerns about the Blackwater Project with respect to how it interacts with your country foods harvesting activities? Please describe.

Information about Health

- Describe your level of physical activity in relation to country foods harvesting?
- Describe the level of physical activity undertaken in a season in relation to harvesting?*
- Do you anticipate your physical activity levels associated with harvesting to change as a result of the Project?* If yes, please describe how.
- How does harvesting country foods contribute to your emotional wellbeing?
- Do you anticipate any changes to your emotional wellbeing as a result of any changes to country foods access/availability/quality?

Information about Culture and Culture Camps

- Describe how country foods harvesting supports your cultural practices?
- What do you think might change to these activities or processes, as a result of potential changes from the Project?
- Do you anticipate impacts of the Project to culture camps?
- Any changes in the camp location?
- Any changes in the type of activities undertaken at the culture camp due to the Project?
- Any change do levels of participation due to the Project?
- How would these changes affect the transfer of traditional knowledge?

APPENDIX D MONITORING APPROACHES FOR COUNTRY FOODS

Appendix D: Monitoring Approaches for Country Foods

Table D-1 identifies the monitoring approaches from BW Gold monitoring and management plans that will support understanding changes to country foods access, availability and quality. In the case that a monitoring approach has not been identified in a related or supporting monitoring plan, proposed monitoring has been identified and will rely on information provided by Indigenous groups through focus groups and workshops.

Species	Objectives	Indicators	Triggers	Monitoring Method	Frequency	Monitoring Locations (where specified)
Black huckleberry*	To understand contaminants of potential concerns (COPC) concentrations in berries and identify whether there are Project-related changes in the quality of these media.	18 metal COPCs listed in Table 3-1 of the CFMP.	Section 6.3 and Table 6.3-3 of the CFMP.	Media sampling and laboratory analysis.	Late July to mid-August (peak summer) every three years during and following construction.	Sampling during construction and operation is focused outside of the mine site. Figure 4.3-1 of the CFMP (version C.1).
Blueberry*	To understand COPC (metal) concentrations in berries and identify whether there are Project-related changes in the quality of these media.	18 metal COPCs listed in Table 3-1 of the CFMP.	Section 6.3 and Table 6.3-3 of the CFMP.	Media sampling and laboratory analysis.	Late July to mid-August (peak summer) every three years during and following construction.	Sampling during construction and operation is focused outside of the mine site. Figure 4.3-1 of the CFMP (version C.1).
Hudson Bay Tea/Labrador Tea*	To understand COPC (metal) concentrations in plants and identify whether there are Project-related changes in the quality of these media.	18 metal COPCs listed in Table 3-1 of the CFMP.	Section 6.3 and Table 6.3-3 of the CFMP.	Media sampling and laboratory analysis.	Late July to mid-August (peak summer) every three years during and following construction.	Sampling during construction and operation is focused outside of the mine site. Figure 4.3-1 of the CFMP (version C.1).
Mushrooms	To understand changes in access, availability and visual quality, as defined in this FUP.	Table 4-2 of this FUP.	Table 5-1 of the FUP.	Focus group/workshop; Monthly reports from Aboriginal Group Monitors.	Semi-annually.	FUP Monitoring Area.
Poplar bark	To understand changes in access, availability and visual quality, as defined in this FUP.	Table 4-2 of this FUP.	Table 5-1 of the FUP.	Focus group/workshop; Monthly reports from Aboriginal Group Monitors.	Semi-annually.	FUP Monitoring Area.
Soapberry*	To understand COPC (metal) concentrations in berries and identify whether there are Project-related changes in the quality of these media.	18 metal COPCs listed in Table 3-1 of the CFMP.	Section 6.3 and Table 6.3-3 of the CFMP.	Media sampling and laboratory analysis.	Late July to mid-August (peak summer) every three years during and following construction.	Sampling during construction and operation is focused outside of the mine site. Figure 4.3-1 of the CFMP (version C.1).
Kokanee salmon*	To understand COPC (metal) concentrations in fish and identify whether there are Project-related changes in the quality of these media.	18 metal COPCs listed in Table 3-1 of the CFMP.	Section 6.3 and Table 6.3-5 of the CFMP.	Media sampling and laboratory analysis.	Every August prior to construction, and every three years during and following construction.	Sampling during construction and operation is focused outside of the mine site, specifically Tatelkuz and Kuyakuz lakes for adult fish. Figure 4.4-1 of the CFMP.
Rainbow trout*	To understand COPC (metal) concentrations in fish and identify whether there are Project-related changes in the quality of these media.	18 metal COPCs listed in Table 3-1 of the CFMP.	Section 6.3 and Table 6.3-5 of the CFMP.	Media sampling and laboratory analysis.	Every August prior to construction, and every three years during and following construction.	Sampling during construction and operation is focused outside of the mine site. Specifically, stream sites closest to the mine site for juvenile fish and Tatelkuz and Kuyakuz lakes for adult fish. Figure 4.4-1 of the CFMP.

Species	Objectives	Indicators	Triggers	Monitoring Method	Frequency	Monitoring Locations (where specified)
Whitefish*	To understand COPC (metal) concentrations in fish and identify whether there are Project-related changes in the quality of these media.	18 metal COPCs listed in Table 3-1 of the CFMP.	Section 6.3 and Table 6.3-5 of the CFMP.	Media sampling and laboratory analysis.	Every August prior to construction, and every three years during and following construction.	Sampling during construction and operation is focused outside of the mine site, specifically Tatelkuz and Kuyakuz lakes for adult fish.
Beaver	<ul style="list-style-type: none">■ To understand changes in access, availability and visual quality, as defined in this FUP.■ In the case of donated samples, per the CFMP, identify COPCs (metals) in mammal tissue.	<ul style="list-style-type: none">■ Table 4-2 of this FUP.■ In the case of donated species, COPCs listed in Table 3-1 of the CFMP.	Table 5-1 of the FUP.	<ul style="list-style-type: none">■ Focus group/workshop; Monthly reports from Aboriginal Group Monitors.■ In the case of donated species, Media sampling and laboratory analysis.	<ul style="list-style-type: none">■ Semi-annually through FUP monitoring.■ Dependent on the types and numbers of samples donated by local hunters and trappers, and the triggers initiating the sampling.	<ul style="list-style-type: none">■ FUP Monitoring Area.■ Dependent on the types and numbers of samples donated by local hunters and trappers.
Black bear (fat)	<ul style="list-style-type: none">■ To understand changes in access, availability and visual quality, as defined in this FUP.■ In the case of donated samples, per the CFMP, identify COPCs (metals) in mammal tissue.	<ul style="list-style-type: none">■ Table 4-2 of this FUP.■ In the case of donated species, COPCs listed in Table 3-1 of the CFMP.	Table 5-1 of the FUP.	<ul style="list-style-type: none">■ Focus group/workshop; Monthly reports from Aboriginal Group Monitors.■ In the case of donated species, Media sampling and laboratory analysis.	<ul style="list-style-type: none">■ Semi-annually through FUP monitoring.■ Dependent on the types and numbers of samples donated by local hunters and trappers, and the triggers initiating the sampling.	<ul style="list-style-type: none">■ FUP Monitoring Area.■ Dependent on the types and numbers of samples donated by local hunters and trappers.
Grouse*	<p>The following applies to bird species:</p> <ul style="list-style-type: none">■ To determine habitat loss and alteration.■ To detect changes in population dynamics.■ To determine nest success in specified areas.¹⁸	<ul style="list-style-type: none">■ Habitat area in the LSA and annual and cumulative habitat loss.■ Number of birds at each survey point.■ Success of nests within specified areas.	<ul style="list-style-type: none">■ Measurable habitat loss beyond that predicted in the EA.■ Triggers to be determined after first two years of data collection.■ A trend of bird nests in specified areas fledging less frequently.	<ul style="list-style-type: none">■ Remotely sensed imagery and GIS analysis.■ RISC protocol population surveys.■ Monitor nest outcomes at buffered locations.	Annually (August), per WMMP.	<ul style="list-style-type: none">■ Bird point count locations (50) to be established.■ Nest outcomes within setback buffers.
Moose	<ul style="list-style-type: none">■ To Determine potential habitat loss.■ To monitor mortality from moose-vehicle collisions.■ To determine late fall and winter distribution within specified areas.	<ul style="list-style-type: none">■ Habitat area in the LSA and annual and cumulative habitat loss.■ Annual and cumulative totals of moose mortalities from moose-vehicle collisions.■ Current winter distribution and density estimate (and changes through time) of moose within specified areas.	<ul style="list-style-type: none">■ Measurable habitat loss beyond that predicted in the EA.■ Any mortality associated with project activities.■ Change in the extent of moose winter distribution, use of specified areas, and abundance in specified areas.	<ul style="list-style-type: none">■ Remotely sensed imagery and GIS analysis.■ Incident reporting.■ Pellet Counts and Snow Track Surveys.	<ul style="list-style-type: none">■ Winter habitat loss will be calculated annually, per WMMP.■ Reporting will occur incidentally.■ Pellet counts: (WMMP, Section 6.2.2.1), snow track surveys (WMMP, Section 6.2.2.2).	

* Asterisk refers to species that are also included in the CFPM.

¹⁸ The probability of grouse nests being monitored (i.e., located within pre-clearing area) in a given year is very low, but is included as this data would be monitored.