ARTEMIS GOLD INC

Blackwater Mine

Waste (Refuse and Emissions) Management Plan

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Work Instructions

Blackwater Mine – Waste (Refuse and Emissions) Management Plan

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Acronyms and Abbreviations

Indigenous nations	Ulkatcho First Nation, Lhoosk'uz Dené Nation, Nadleh Whut'en First Nation, Stellat'en First Nation, Saik'uz First Nation, and Nazko First Nation as defined in Environmental Assessment Certificate #M-19-01
Artemis	Artemis Gold Inc.
BC	British Columbia
BW Gold	BW Gold LTD.
CEO	Chief Executive Officer
CSR	Contaminated Site Regulation
DS	Decision Statement
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
ELoMC	Environmental Life of Mine Monitoring Committee
EMLI	Energy, Mines and Low Carbon Innovation
EMS	Environmental Management System
ENV	Ministry of Environment and Climate Change Strategy
GM	General Manager
FSR	Forest Service Road
km	kilometre
MCM	Ministry of Mining and Critical Minerals
ME	Manager – Environment
MOE	Ministry of Environment
Mt	Million tonnes
New Gold	New Gold Inc.
POPC	Parameters of potential concern
Project QRP	Project Qualified Registered Professional
SOPs	Standard Operating Procedures
t	Tonnes
TSF	Tailings Storage Facility
WMP	Waste Management Plan
WTA	Waste Transfer Areas

1.0 Mine Overview

1.1.1 Mine and Proponent

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

The Mine, located in central British Columbia (BC), is approximately 112 kilometres (km) southwest of Vanderhoof, 160 km southwest of Prince George, and 446 km northeast of Vancouver, BC. The Mine is currently accessed via the Kluskus Forest Service Road (FSR), the Kluskus-Ootsa FSR, and an exploration access road, which connects to the Kluskus-Ootsa FSR at km 142. The Kluskus FSR joins Highway 16 approximately 10 km west of Vanderhoof.

Major Mine components include a tailings storage facility, ore processing facilities, waste rock, overburden and soil stockpiles, borrow areas and quarries, water management infrastructure, water treatment plants, accommodation camps, and ancillary facilities. The Mine uses a gravity circuit and whole ore leach, as well as conventional drill and blast methods. The gold and silver are recovered into a gold-silver doré product and shipped from the Mine.

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

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

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

1.1.2 Indigenous Communities and Traditional Territories

The Mine is located within the traditional territories of Lhoosk'uz Dené Nation, Ulkatcho First Nation, Skin Tyee Nation, and Tsilhqot'in Nation. The Kluskus and Kluskus-Ootsa FSRs and Mine transmission line cross parts of the traditional territories of Nadleh Whut'en First Nation, Saik'uz First Nation, and Stellat'en First Nation (collectively, the Nechako First Nations), as well as the traditional territories of the Nazko First Nation, Nee Tahi Buhn Band, Cheslatta Carrier Nation, and Yekooche First Nation (Environmental Assessment Office [EAO] 2019a, 2019b).

1.1.3 Permits and Mineral Tenures

Surface and subsurface rights within the Mine area are controlled by the Crown. BW Gold's' mining lease and mineral claims for the Mine are administered under the B.C. *Mineral Tenure Act* and Regulations. *Mines Act* Permit M-246 authorizes the mine plan and reclamation program for the Mine.

The Mine received an EAC (M19-01) on June 21, 2019, under the BC *Environmental Assessment Act* (2002), and a federal Environmental Assessment Decision Statement (DS) on April 15, 2019, under the *Canadian Environmental Assessment Act*, *2012* (2012), approving construction, operation and closure of the Mine, subject to conditions. In August 2020, Artemis acquired the mineral tenures, assets, and rights for the Blackwater Mine that were previously held by New Gold Inc. (New Gold). On August 7, 2020, the EAC was transferred to BW Gold under the BC *Environmental Assessment Act* (2018), and on

March 8, 2023, BW Gold received the Joint Application for *Mines Act/Environmental Management Act* (Joint MA/EMA Application) permits for the Mine.

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

There are no conditions in the Environmental Assessment Certificate (EAC) or federal Decision Statement (DS) that directly address waste management activities within the scope of this Waste Management Plan (WMP). However, Table 9.1-1 of the Construction Environmental Management Plan (EAC #M19-01 Condition 13c) provides waste management mitigation measures and best management practices that will be implemented to mitigate environmental impacts and help keep employees and contractors safe during construction and operations.

*Environmental Management A*ct Authorization PE # 110650:

PE #110650 Section 1.11 authorizes BW Gold to discharge air from the operation of an auxiliary fuel fired, refuse incinerator (reference number E328685). The Authorization allows a maximum discharge of 1,584 standard cubic metres per hour to a maximum of 4,380 hours per year, and discharge must not exceed a total particulate matter concentration of 30 mg/m^3 (standard volume). Authorized waste for incineration includes putrescible camp waste, paper, cardboard, and lumber scraps that cannot be recycled. Invasive plants removed from site may be included in the organic waste stream for incineration.

BW Gold must regularly inspect the authorized works and appurtenances, and to maintain them in good working order, in accordance with the manufacturer's recommended maintenance schedule. Inspections and maintenance records must be kept on site and available to an Ministry of Environment and Climate Change Strategy (ENV) Officer on request.

Section 3 of PE # 110650 specifies the Operating Requirements for incinerator use, including:

- s 3.1 the preparation of the WMP
- s 3.2 Waste Reduction and Management of Recyclable Materials
- s 3.3 Incinerator Operating Plan
- s 3.4 Incinerator Attendant
- s 3.5 Incinerator Operation
- s 3.6 Disposal of Ash
- s 3.7 Containment of Putrescible Waste and Ash
- Section 6 outlines Reporting Requirements, including the preparation of Annual Reports and Evaluation, including:
- s 6.1.k A summary of the data collected for the Incinerator Operating Plan as required in section 3.3
- s 6.1.n A summary of inspection and maintenance activities of the Authorized Works
- s 6.1.o A summary of all non-compliances, details and remedial actions to prevent recurrence (see also Section 6.3 Non-compliance Notification, and 6.4 Non-compliance Reporting)
- s 6.1.p Occurrences or observations of wildlife accessing waste and mitigation measures taken
- s 6.1.q Spill summary of volumes greater than the Spill Reporting Regulations

- s 6.1.r The Annual Status Form required by Section 6.5

Municipal Wastewater Regulation Authorization # 105882:

BW Gold is registered under the *Municipal Wastewater Regulation* (MWR) as authorization #105882 , which permits the discharge of up to 57.5 m^3/day of secondary treated effluent (Class C) to a septic field from the 250-person mining exploration camp, and authorization #110731 which permits the discharge of 207 m^3/day of effluent that meets Class C municipal effluent quality requirements of MWR section 75 Table 3. Operating plans and operations and maintenance manuals pertinent to the MWR are maintained onsite to ensure waste streams associated with the registration comply with the *Environmental Management Act* and the *Municipal Wastewater Regulation.*

Mines Act Permit: M-246

Permit M-246 Part C (1) requires BW Gold to maintain an Environmental Management System (EMS) consisting of Environmental Management Plans (EMPs) and Standard Operating Procedures (SOPs).

The Permittee must ensure the EMS references relevant policies and establishes proactive procedures to provide direction for effective operational management and monitoring on-site.

The WMP is a component plan of the EMS. It is to be reviewed annually, revised as required and made available to the Inspector of Mines on request. Permit M-246 requires mine site employees and contractors to be knowledgeable and accountable to act consistently with the requirements of the EMPs and SOPs forming the EMS. The M-246 Annual Reclamation report guidelines require documentation of hazardous waste management on site during reclamation and closure.

2.0 Management Plan Overview

The intent of BW Gold's WMP is to list and describe the mitigation and monitoring measures to fulfill the requirements of PE-110650, M-19-01, M-246. The primary goals of this WMP are to clearly indicate the roles and responsibilities for employing management and monitoring measures, guide monitoring of waste management, and provide guidance on how adaptive management measures are to be employed.

2.1 Purpose and Objectives

The purpose of the WMP is to meet a requirement under condition 3.1 of Permit 110650 of the *Environmental Management Act*. With completion of the Construction phase, the focus of the plan is now on the Operations, Closure and Post-closure phases.

The WMP does not consider the following discharges as they are addressed in other management plans or separate permits:

- Air contaminant discharge and associated mitigation measures and monitoring, as they are considered in the Air Quality and Fugitive Dust Management Plan.
- Domestic wastewater discharge from the plant site to the Tailings Storage Facility (TSF). This discharge is considered in the Mine Site Water and Discharge Management and Monitoring Plan.
- Domestic wastewater discharge from the existing exploration camp. This discharge is permitted under Municipal Wastewater Regulation Authorization #105882.
- Domestic wastewater discharge associated with the construction laydown area and offices, as this discharge is considered in a separate application under the Sewerage System Regulation.
- Stormwater runoff as this discharge is considered in the Mine Site Water and Discharge Monitoring and Management Plan.
- Hazardous waste, cyanide and fuel management are considered in other plans, including the Fuel Management and Spill Control Plan; Chemicals and Materials Storage, Transfer and Handling Plan; and Cyanide Management Plan.
- Waste rock generated through mining and construction activities are considered under the Mines Act permit M-246 authorizations and supporting management plans.

This WMP considers the following mine facilities at which waste management infrastructure will be utilized as described in this plan: incinerator, operations camp, Plant Site, laydown areas, and Waste Transfer Area. The current mine plan (and this WMP) does not include an onsite solid waste landfill. BW Gold may consider a future landfill under the *Environmental Management Act* to dispose of material produced during operations and closure. The WMP would need to be revised to incorporate permit conditions should a landfill be permitted, particularly with respect to the closure and post-closure waste management strategy.

2.2 Related Documents

The WMP shares common elements with the following plans:

- Incinerator Operating Plan
- Construction Environmental Management Plan
- Wildlife Mitigation and Monitoring Plan
- Spill Control and Emergency Response Plan

- Mine Site Water and Discharge Monitoring and Management Plan

Standard Operating Procedures (SOPs) are managed onsite by the project team and may be subject to frequent revisions to adapt to changing needs at site. However, the SOPs will continue to be aligned with and governed by the mitigations in the management plan.

2.2.1 Applicable Legislation and Regulations

Waste management in BC is regulated mainly under the *Environmental Management Act* (EMA) and its regulations. The EMA governs discharges of waste to air (for example incinerator), ground (for example landfill), and effluent to water (for example tailing storage facility discharge).This Waste Management Plan will continue to be in alignment with conditions specified in the EAC M19-01, *Mines Act* Permit M-246, and EMA (2003) Permit 110650.

Federal legislation which is broadly applicable to the WMP includes:

- *Canadian Environmental Protection Act*, *1999,* SC 1999, c. 33:
  - An Act respecting pollution prevention and the protection of the environment and human health in order to contribute to sustainable development.
- *Impact Assessment Act,* RSC 2019, c. 28:
  - An Act outlining a process to assess the impacts of major projects and establish approvals and conditions for matters under federal jurisdiction.
- *United Nations Declaration on the Rights of Indigenous Peoples Act:*
  - Canada adopted the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), a framework that outlines the minimum standards for the survival, dignity, and well-being of Indigenous peoples worldwide.
- *Fisheries Act* RSC, 1985, c.F-14:
  - The Act provides a framework for a) the proper management and control of fisheries, and b) the conservation and protection of fish and fish habitat.

Provincial legislation applicable to the WMP which is directly linked to or guides the implementation of the WMP includes:

- *Declaration on the Rights of Indigenous Peoples Act*:
  - The Act establishes the framework in BC for consulting with Indigenous People on resource management decisions
- *Environmental Assessment Act* SBC 2018, c. 51.
  - Establishes the legal basis for the EAC and project approval conditions
- *Environmental Management Act* SBC 2003, c. 53*;*
  - The Act provides authority for issuance of permits to discharge waste to the environment (air, solid, or effluent waste) and is supported by specific Regulations relevant to this WMP:
    - Contaminated Sites Regulation;
    - Municipal Wastewater Regulation;
    - Waste Discharge Regulation;
- *Mines Act* RSBC 1996, c. 293 :

  - Provides the Chief Inspector of Mines and Chief Permitting Officer the authority to manage the health, safety and environmental aspects of Mines, primarily through the Health, Safety and Reclamation Code for Mines in BC (2024), and including the requirement for a WMP and the siting of waste management facilities on a mine site.
- Health, Safety and Reclamation Code for Mines in British Columbia (Code; EMLI 2024):
  - Part 2, Section 2.3 (Hazardous Materials and Waste)
  - Part 10, Section 10.5.6 (Spontaneous Combustible Material)
- *Public Health Act* SBC 2008, c. 28*:*
  - Authority for maintaining best practices concerning Industrial Camps health practices including waste management*.*
- Industrial Camps Regulation; and
- *Wildlife Act* RSBC 1996, c. 488*:*
  - Guidance and requirements for avoiding or minimizing wildlife – industrial interactions

2.3 Roles and Responsibilities

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

Table 2-1 provides an overview of the waste management roles and responsibilities at the Mine during implementation of the Waste Management Plan.

BW Gold will employ a qualified person as an ME who will ensure that the EMS requirements are established, implemented and maintained, and that environmental performance is reported to management for review and action. The ME is responsible for retaining the services of qualified persons or QRPs with specific scientific or engineering expertise to provide direction and management advice in their areas of specialization. The ME will be supported by Environmental Monitors that will include Environmental Specialists and Technicians and by external consultants as required.

During closure and post-closure staffing levels will be reduced to align with the level of activity associated with these phases. The Mine Manager will have overall responsibility for Closure and Post-closure activities.

Table 2-1: Roles and Responsibilities

Position	Responsibility
Mine Manager	The Mine Manager, as defined in the *Mines Act* (1996), has overall responsibility for mine operations, including the health and safety of workers and the public, EMS implementation, overall environmental performance and protection, and permit compliance. The Mine Manager may delegate their responsibilities to qualified personnel. The Mine Manager reports to the Chief Executive Officer (CEO).
Manager – Environment (ME)	The ME is responsible for the day-to-day management of the Mine's environmental programs and compliance with environmental permits, as well as for updating the EMS and management plans. The ME or designate will be responsible for reporting non-compliance contractors, the Company, and regulatory agencies, where required. Reports to the Mine Manager.
Departmental Managers	Departmental Managers are responsible for implementation of the EMS relevant to their areas. Departmental Managers report to the Mine Manager
Aboriginal Monitors	Aboriginal Monitors are required under EAC #M19-01 Condition 17 and are responsible for monitoring potential effects from the Mine on Indigenous interests. Aboriginal Monitors are involved in adaptive management and follow-up monitoring programs. Aboriginal Monitors report to the ME.
Employees and Contractors	Employees and contractors are responsible for being aware of permit requirements specific to their roles and responsibilities. Employees and contractors report to Departmental Managers.
Qualified Registered Professionals and Qualified Persons	Qualified registered professionals and qualified persons will be retained to review objectives and conduct various aspects of environmental and social monitoring as specified in environmental and social management plans.

Notes:

EAC = Environmental Assessment Certificate; ME = Manager – Environment; EMS = Environmental Management System; Mine = Blackwater Mine

2.4 Guidelines and Best Management Practices

Guidance relevant to refuse management and applicable to the Mine include:

- Technical Document for Batch Waste Incineration (EC 2010)
- Applicable authorizations required to dispose of various waste streams provided in the Industrial Camp Fact Sheet - Industrial Camps Waste Authorizations and Best Practices (ENV 2018); and
- Garbage disposal guidance provided in Section 22 of the Guidelines for Industrial Camps Regulation (MOH 2017).

In support of Mine requirements, BW Gold may augment or replace incinerators from time to time to remain in compliance with the EMA Permit PE # 110650.

3.0 Adaptive Management Framework

The WMP is a living document that will evolve over time in response to monitoring results and regulatory changes. The plan incorporates adaptive management as follows:

- Plan
  - Identification of potential and actual waste discharges.
  - Identification of waste management strategies.
- Do
  - A schedule for implementation and operation of control measures.
  - Description of record keeping procedures for tracking all wastes (recycled or otherwise disposed) taken offsite.
  - Provision of proper containers for segregation of waste to safeguard against human exposure to waste materials and prevent wildlife attractants and encounters.
  - Training procedures.
- Monitor
  - Execution of monitoring programs to ensure appropriate waste levels are not exceeded.
  - Inspection of waste management areas and facilities.
  - Implementation of WMP.
- Adjust
  - The Environment Department reviews the effectiveness of management measures. The responsibility to review the effectiveness of the WMP may also fall to a health and safety representative or a shop manager/steward, as required. The responsible person will be expected to read and understand the requirements outlined in the WMP and is expected to have prior experience with construction/mining waste management.
  - Updates made to WMP as required.

4.0 Training and Education

Employees and contractors will receive training in waste management and wildlife management on their arrival onsite through Site Orientation. The purpose of this training is to provide all site personnel with a basic level of environmental awareness and an understanding of their obligations regarding compliance with regulatory requirements, commitments, and best practices. At a minimum, the Site Orientation will include the following topics with respect to waste management:

- An overview of the Mine's waste management approach;
- Employee responsibilities with respect to proper waste management;
- Promote workplace cleanliness by reinforcing the expectation to keep areas free of uncontained refuse and placing litter, including cigarette butts, into appropriate waste containers;
- An awareness of wildlife attractants; and
- The importance of segregating plastics from putrescible wastes destined for incineration to comply with the site recycling requirements.

Signage is an important part of waste management education. BW Gold has installed and will maintain signage to help direct waste management implementation strategies (e.g., garbage, recycling, and putrescible waste streams) at appropriate receptacles and waste transfer areas as per the Waste Management SOP.

Site supervisors will be provided with a copy of the WMP and will receive additional instruction with respect to the requirements that are outlined in the form of operational standard operating procedures (SOPs). Targeted instruction related to waste management will be provided to individuals and/or groups of workers assuming a specific authority or responsibility related to waste handling, storage, and disposal, if applicable. This instruction will be delivered prior to conducting work and if required update SOPs and ensure site departments have access to required documents.

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

5.0 Waste Management Approach

The Mine will employ a structured and disciplined waste management approach. The quantities (volumes, weight, units) of waste material will be documented and is an important component of informing the mine site's reporting. Management of waste will apply a waste hierarchy procedure as follows:

- Avoid/Reduce – take action to reduce or avoid waste generation;
- Reuse/Recycle – reuse or recycle wastes where practical; and
- Treat/Dispose – treat or dispose of waste in an environmentally responsible manner that meets regulatory requirements.

5.1 Avoid /Reduce

Actions will be undertaken to avoid waste generation, or where this is infeasible, reduce waste generation as practicable.

Mine procurement of materials and supplies is rigorously managed to avoid ordering of un-needed or surplus materials which then risk entering the waste stream. Optimal use of materials and supplies contributes to reduction in waste streams, the need for additional waste storage containment and transfer facilities, and cost of shipping waste offsite for disposal.

5.2 Reuse /Recycle

- Actions will be undertaken to re-purpose or recycle waste as follows:
- Scrap iron and steel will be placed in designated and marked bins.
- Scrap copper will be segregated if practicable and stockpiled separately, as it is of greater value than steel and iron. Copper wire and brass scrap will be placed in designated bins marked scrap copper.
- Mixed recyclables include glass, tins, aluminum cans and plastics. Segregation to the degree possible at source by means of placing specially marked bins inside to prevent mixed recyclables from becoming wildlife attractants is planned throughout the camp, offices, and operational areas with subsequent transfer to larger designated bins. Aluminum cans are recycled through bottle and beverage recycling depots. Scrap tins go through metal recycling bins. Additional procedures for plastics and glass are being examined. Soiled cardboard that cannot be recycled will be disposed of as food waste, by means of the onsite permitted incinerator, or strictly controlled open burning (assuming permits are obtained, and conditions are favourable). Offsite disposal will also be an option if incineration is not possible due to permitted volume limits.
- Different forms of plastics remain unseparated from each other on site and are instead placed together. After being transferred off-site by the recycling contractor, plastics are separated by the contractor.. Additional procedures are being examined. Incineration of plastic and other recyclable material (defined in Authorization #110650) are prohibited and will be achieved by separating plastics from putrescible wastes destined for incineration. Waste may contain food residues despite best efforts in rinsing, thus these bins will be stored inside buildings or in secured bins to prevent wildlife access. These bins will be monitored for the presence of wildlife and the recycling policy for plastics with food residue will be reviewed and adjusted in the event of wildlife interactions.
- Tires can be re-purposed on site. Excess tires which cannot be re-purposed onsite are to be stored neatly in a designated area prior to offsite shipping/recycling.

- Vehicle wet batteries (lead acid) are considered hazardous and regulated under the Transportation of Dangerous Goods Regulations. As such, they will be stored on containment pallet(s) or in designated containers and held for pickup by a licensed contractor.
- General, domestic use battery types (alkaline, NiCad, Lithium-ion, etc.) will be segregated at source by means of placing in specifically marked cardboard boxes to be recycled.
- Printer or toner cartridges will be placed in designated and marked containers in various office locations.
- Light bulbs and fluorescent tubes will be placed in designated and marked containers in various office locations.
- Mobile phones and electronic equipment (e-waste) will be placed in designated and marked containers for recycling.
- Packaging materials will be segregated (metal or plastic strapping, cardboard, bubble or plastic sheet wrap, Styrofoam, wood) and placed in designated bins and directed to landfills. Wood bins are on site, clean cardboard is recycled and disposed of when not. Selectively separated materials (i.e. clean wood and cardboard) may be approved for incineration and/or through open burning (PE 110650).
- Mixed construction/packaging materials are disposed of through general construction waste bins and authorized waste company.
- Metal drums that cannot be reused (e.g., to store used fuel filters) will be removed from site by a licensed transporter and received at an approved waste management facility.
- Kitchen grease/oil is collected in closed top drums or storage vessel which will be stored in a manner that is inaccessible to wildlife prior to offsite shipping.
- Some recyclables may be backhauled offsite in outgoing delivery vehicles and donated to a local charity as recipients are identified. BW Gold sends recyclables to a recycling depot from which funds generated are distributed among the community.

5.3 Treat /Dispose

Actions will be undertaken to treat and/or dispose of waste onsite, or shipment to designated offsite recycling or disposal locations:

Refer to Section 8 and Table 8.1-1 and 8.1-2 for a listing of industrial and domestic mine discharges during Operations and the intended disposal method or methods.

5.4 Mine Facilities

Mine facilities will include designated temporary waste collection and storage areas, located near areas where waste is produced including the plant site, laydown areas, camps, and other areas.
Specific locations will be identified by the Departmental Managers, as necessary for the various Operation phases with input and approval of the ME.

Appendix B illustrates the general location mine waste facilities with potential to be wildlife attractants.

5.5 Waste Transfer Areas

Waste transfer areas (WTA) will be established to manage material destined for on-site incineration, recycling, and for offsite disposal until a qualified contractor(s) is scheduled to transport waste material to the appropriate offsite facility(ies). Contractor pickup frequency will vary depending on quantity of waste.

During Operations, WTAs will be established to serve operational needs for kitchen waste and recyclables, and hazardous and non-hazardous waste. Each WTA will be designed to adequately and safely store a sufficient quantity of waste over a prescribed time period.

Hazardous waste disposal practices are not relevant to this WMP as their management is described in the Chemical and Materials Storage, Transfer and Handling Plan.

Kitchen waste and recyclables will be held at camp(s) in bear-proof secure containment to prevent attraction of wildlife.

Waste sorting guidelines and SOPs related to waste flow (generation points, waste collection/handling, operation of waste sorting and processing facilities) are to be developed in accordance with the WMP.

Final WTAs locations are described in applicable sections of the Waste Management SOP.

6.0 Discharges during Operations

6.1 Refuse

Discharges associated with refuse are presented in Table 6.1-1. Under the *Environmental Management Act*, "*refuse" means discarded or abandoned materials, substances or objects*. It includes domestic and industrial non-hazardous waste. Table 6.1-1 address construction projects during Operations.

Table 6.1-1: Refuse Discharge Sources during Construction Projects and Operations

	Construction	Operations
Refuse	• Domestic non-hazardous waste (including food waste and packaging) originating from all Operation facilities. • Industrial waste resulting from construction and maintenance of Operation infrastructure and equipment/vehicle maintenance.	• Domestic non-hazardous waste originating from all Operation facilities. • Industrial waste resulting from construction and maintenance of Operation infrastructure, process plant operation, water and wastewater treatment, and equipment/vehicle maintenance.

6.1.1 Industrial Waste

Debris and unused material from work areas will be removed upon completion of work to designated areas described below. Combustible (non-putrescible) wastes such as clean, untreated wood waste may be incinerated or burned through strictly controlled open burning (as per Permit PE 110650)., or transferred to an offsite facility, consistent with provincial authorizations. Pallets will be stockpiled and reused wherever possible. Pallets that cannot be reused may be incinerated or burned through strictly controlled open burning (as per Permit PE 110650). If burning is prohibited during extreme fire years, for example, combustible materials will be sent to an offsite landfill (stockpiling onsite is not permitted in accordance with *Environmental Management Act* Permit PE 106530).

Non-combustible solid wastes are those that cannot readily burn and those that are not suitably disposed of through burning (e.g., conveyor belts and tires). These materials will be stored in designated and marked areas/bins located throughout the site. Wastes such as scrap metal, and unsalvageable equipment will be sorted in steel recycle bins for either onsite re-use or offsite recycling / disposal.

Bulk wastes that cannot be recycled or incinerated will be hauled to an approved offsite disposal facility. This waste may consist of treated wood, rubber, non-recyclable scrap metal and machinery parts (cleaned of any petroleum residues), building construction debris, and plastics. Table 6.1-2 identifies options for disposal of these materials.

6.1.2 Domestic Waste

Domestic, putrescible kitchen wastes will be incinerated, subject to Authorization #110650. Domestic waste that cannot be incinerated will be hauled to an approved offsite disposal facility. Plastics will be separated at source where possible and not incinerated to minimize dioxin and furan emissions and to ensure compliance with the Canada Wide Standard for dioxins/furans. Ash disposal will be in accordance with Authorization #110650.

Table 6.1-2: Waste Categories and Disposal Methods

Waste Category	Waste Products	Destination/Fate[1]
Food Waste	Food waste and food packaging	Incinerated or landfill
	Kitchen grease	Incinerated or landfill
	Juice boxes	Recycled
	Bottles	Recycled
	Cans	Recycled
Non-Food Non-Hazardous Waste	Wood	Reused or incinerated/open burned/ transported offsite for processing
	Office waste (combustible/non-recyclable)	Sorted, packed, incinerated or transported offsite for processing or landfilling
	Cardboard (including corrugated cardboard)	Reuse/Recycle or incinerated/Open Burned/Offsite or landfill
	Plastics	Recycled or landfill
	Rubber, Conveyor Belts, Tires	Reused/recycled or landfill
	Plywood	Restocked/reused or incinerated/open burned/transported offsite for processing
	Incinerated waste	Landfill
Hazardous Waste	Not relevant to the WMP	Refer to Chemical and Materials Storage, Transfer and Handling Plan
Metal	Scrap metal	Offsite recycling or disposal
	Electronic waste	Packed, transported offsite, recycled

[1] At the date of this version of the WMP there is no onsite landfill permitted, although an onsite landfill may be permitted during Operations in the future.

6.2 Contaminated Soil and Snow Management

During Operation and Closure, there is potential for spills of hydrocarbons, solvents, lubricants and/or glycol. Spill response is addressed in the Spill Response Plan (Fuel Management and Spill Control Plan). Depending on the size of the spill, excavation may require mechanized equipment.

Hydrocarbon-contaminated soils recovered during Operations will be transported offsite. This will also be the process for removal of contaminated soils upon completion of Operations should contaminated soils be present at that time, and in accordance with the Reclamation and Closure Plan. Treatment of hydrocarbon-contaminated soils through the mill during Operations is not authorized.

Hydrocarbon contaminated snow will be recovered, and either processed through the truck wash with hydrocarbons recovered via the oil-water separator or alternatively trucked to an offsite suitable disposal facility. Treatment of hydrocarbon-contaminated snow through the mill during Operations is not authorized.

Records will be maintained of all spills, including remediation actions, such that the final Reclamation and Closure Plan will address any final clean-up concerns.

Monitoring associated with potential contaminated sites will be addressed in the post-closure monitoring plan in the approved final Reclamation and Closure Plan.

7.0 Decommissioning or Remedial Activities

Pursuant to Section 3, Part 1 of the *Contaminated Site Regulation* (CSR), an owner of real property described in section 40 (2) (b) of the *Environmental Management Act* must provide a site profile not less than 10 days before the time the owner dismantles a building or structure, or otherwise decommissions a site which was used for an industrial or commercial purpose or activity listed in Schedule 2 of the regulation. Mining and milling of non-ferrous metals is included in Schedule 2; as such it is anticipated that completion and submission of a site profile will be required as part of Closure activities.

During the Closure phase, a site investigation (Stage 1 preliminary site investigation and if necessary, Stage 2 detailed site investigation; BC MOE 2016a, 2016b) will be completed to support the site profile to identify any areas of environmental concern where concentrations of parameters are greater than the standards prescribed under the CSR (BC MOE 2009). The CSR identifies standards for soil, groundwater, and surface water quality for various categories of land use and different biological receptors (i.e., Schedule 3.1, Schedule 3.2, and Schedule 3.4). The applicable standards are based on two of the proposed end land and water use(s) for the Mine:

Objective 2 Self-sustaining vegetation that will progress to plant communities similar to pre-disturbance ecosystems as supported by the results of the ecohydrological modelling.

Objective 5 Water quality and flow that support aquatic life and fish habitat downstream from the mine site and reclamation objectives.

Key components and infrastructure that could be sources of parameters of potential concern (POPC) [1] include:

- Open pit and dewatering system;
- Explosives manufacturing facility;
- Process plant and associated facilities (mill, reagent, adsorption, primary crusher, cone crusher and screen, and gold room);
- Tailings storage facility, spillways, and seepage collection system, including the environmental control dam;
- Waste stockpiles;
- Low grade ore stockpile, including diversion channel, low permeability foundation, and seepage collection system;
- Contact water management infrastructure;
- Water treatment plants, ponds, pumps and piping;
- Borrow areas and quarries;
- Sewage treatment system, incinerator (existing), and solid waste facilities;
- Truck and equipment repair shop; and
- Haul and service roads and the mine access road.

If concentrations of parameters of potential concern are found to be higher than the applicable BC CSR standards (or are higher than background concentrations, when background is higher than the applicable BC CSR standard), the parameter will be identified as a POPC. Additional site reclamation, remediation (e.g., removal of contaminated environmental media, onsite or *in situ* treatment), and/or human health

[1] BC ENV Contaminated Sites Division often uses the terminology “potential contaminants of concern (PCOC)”, while the conceptual site model in Section 5.2 of the Joint Application uses the terminology “parameters of potential concern (POPC)” which is used by BC ENV Environmental Protection Division. These terms have the same meaning and, for consistency with the CSM in Section 5.2, POPC is used here.

and ecological risk assessment may be required to further characterize or address the areas of environmental concern. The Annual Reclamation Report will report on activities in support of achieving Objective 2 and Objective 5 during Closure and Post-Closure.

8.0 Monitoring

Waste monitoring includes the visual inspection of the main components of the waste management system and the measurement and recording of all wastes (recycled or otherwise disposed) taken offsite including: type and quantities of waste transported; location and name of disposal or recycling facility; and the date that each was hauled offsite. Wastes shipped offsite will be recorded using an offsite disposal log or equivalent. Inert solid wastes will be stored in bins with secured lids to avoid windblown debris and animal attraction.

Monthly visual inspections of waste management facilities will be conducted by the Environment department to oversee proper operation and adequate environmental/health and safety controls are in place, and to confirm overall conformance with the requirements of the WMP and companion SOPs and Waste Sorting Guidelines. Compliance inspection forms will be used to document the findings and required actions. These completed forms will be developed as an internal operational monitoring tool to promote continuous improvement in environmental performance and stewardship.

Waste inspections will follow quality procedures during Operations, and corrective actions will be applied if opportunities for improvement or non-conformances are reported. Corrective actions will be specific to the waste stream but could include additional training and education, or an increase in monitoring frequency as part of the adaptive management response.

9.0 Reporting and Record Keeping

9.1 Reporting

9.1.1 *Environmental Management Act*

Environmental Management Act permits for mine projects require annual reports to be submitted to the Ministry of Environment and Parks by 31 March annually. Annual reports are public documents and include a summary of environmental incidents, all monitoring under permits, an assessment of the data by a qualified professional, and recommendations as appropriate. Separate reports or sections of the annual report are expected for air, refuse and water/receiving environment (PE 110650 Section 8).

Reporting requirements will follow Technical Guidance 4 (BC MOE 2016c) and any amendments or updates thereto.

The Waste Management Plan will be reviewed annually in accordance with EMA Permit 110650 and any updates to the Plan will be proposed in the Annual Reclamation Report.

9.1.2 Annual Reclamation Report

Mines Act Permit M-246 and the Code require the submission of an Annual Reclamation Report by 31 March annually. The report will detail waste management activities on the mine site. Data will be entered in a standardized format and program that will allow for comparison between years. Monitoring data will be stored for the life of mine. The Energy, Mines and Low Carbon Innovation (EMLI) guide to the preparation of Annual Reclamation Reports lists the types of information required to be summarized for specific monitoring programs in the report. Results and monitoring activities will be reported throughout mine life and during post-closure, until further monitoring and management is not required, as determined by the Ministry of Mining and Critical Minerals (MCM) and ENV.

The Annual Reclamation Report will be submitted to MCM and provided to Indigenous nations on or before March 31 each year.

9.2 Record Keeping

The Environment Department is responsible for data management and reporting related to waste management. The data management system will include conducting inspections and monitoring and providing these results to appropriate parties as required. The ME will also report key results of waste management monitoring and related environmental, health and safety incidents to the Enviromental Life of Mine Committee (ELoMC) and Indigenous nations during routine meetings.

Monitoring data will have quality control checks completed upon receipt of results. Data will be entered into a standard format that allows for data analysis and reporting. Monitoring data will be stored for the life of the mine and will be made available for review upon request.

Waste volumes leaving the site are tracked by BW Gold Warehouse and Logistics Department based on invoices provided by waste bin providers.

10.0 Evaluation and Adaptive Management

The WMP will be reviewed annually by the Environment Department and QRP to assess its effectiveness and evaluate waste management strategies. The strategy employed by BW Gold will be regular monitoring as described in Section 8, supported by operational change and adoption of other mitigating measures as warranted. BW Gold will be proactive in its approach to waste management, identifying needs and responses in advance of new or modified activities which may result in altered waste streams.

Housekeeping and operational measures will be instituted as described in this plan. Work procedures will be continuously adapted to target measures that: Avoid/Reduce, Reuse/Recycle, and Treat/Dispose. Regular scheduled inspections of waste management facilities along with non-compliance reporting system described in Section 8 will oversee continuous improvement and adaption of waste management strategies throughout the mine life.

BW Gold will conduct and document management reviews of the WMP on a regular basis. Such reviews will ensure the integration of monitoring results with other aspects of the Operation (e.g., other management plans) and that necessary adjustments are implemented as required.

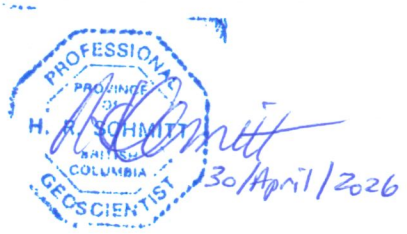
The timing of plan updates may be informed by changes to other relevant management plans, the types of waste generated on site, monitoring results, and regulatory changes.

11.0 Plan Revision

The WMP is a “living” document and it will be reviewed annually as required by Permit PE 110650. Changes to the WMP, including additions or updates to site specific prescriptions, mitigation measures or monitoring programs, will be driven largely by revisions to discipline-specific management plans and adaptive management responses. Proposed changes will be documented via the provision of a change log document including rationale for changes, which will be provided at the same time (where possible) or following resubmission of the WMP. Revised versions of the WMP will be dated, version controlled, QRP-signed and filed with MCM through Mine Space, Aboriginal Groups via email and posted to BW Gold’s website. Upon submissions of updated Management plans, reviewers will be invited to share and direct any comments, questions or concerns on the WMP updates through the ELoMC. Regular presentations of implementation of management plans including the WMP will also be provided to reviewers per the ELoMC annual schedule of topics/development of monthly meeting agendas.

12.0 Qualified Registered Professionals

This management plan has been reviewed by the following qualified registered professionals:

Reviewer Role	Name	Signature	Date
Reviewed by:	Rolf Schmitt, P.Geo. Technical Director EGBC Licence No. 19824 ERM Permit to Practice No.: 1001271		30 April 2026

13.0 References

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

Legislation

Canadian Environmental Protection Act, 1999, SC 1999, c. 33.

Contaminated Sites Regulation, BC Reg. 6/2021.

Declaration on the Rights of Indigenous Peoples Act,

Environmental Assessment Act, SBC 2018, c. 51.

Environmental Management Act, SBC 2003, c. 53.

Fisheries Act, RSC, 1985, c.F-14

Impact Assessment Act, RSC 2019, c. 28.

Industrial Camps Regulation, BC Reg. 70/2012.

Mines Act, RSBC 1996, c. 293.

Public Health Act, SBC 2008, c. 28.

Waste Discharge Regulation, BC Reg. 320/2004.

Wildlife Act, RSBC 1996, c. 488.

Secondary Sources

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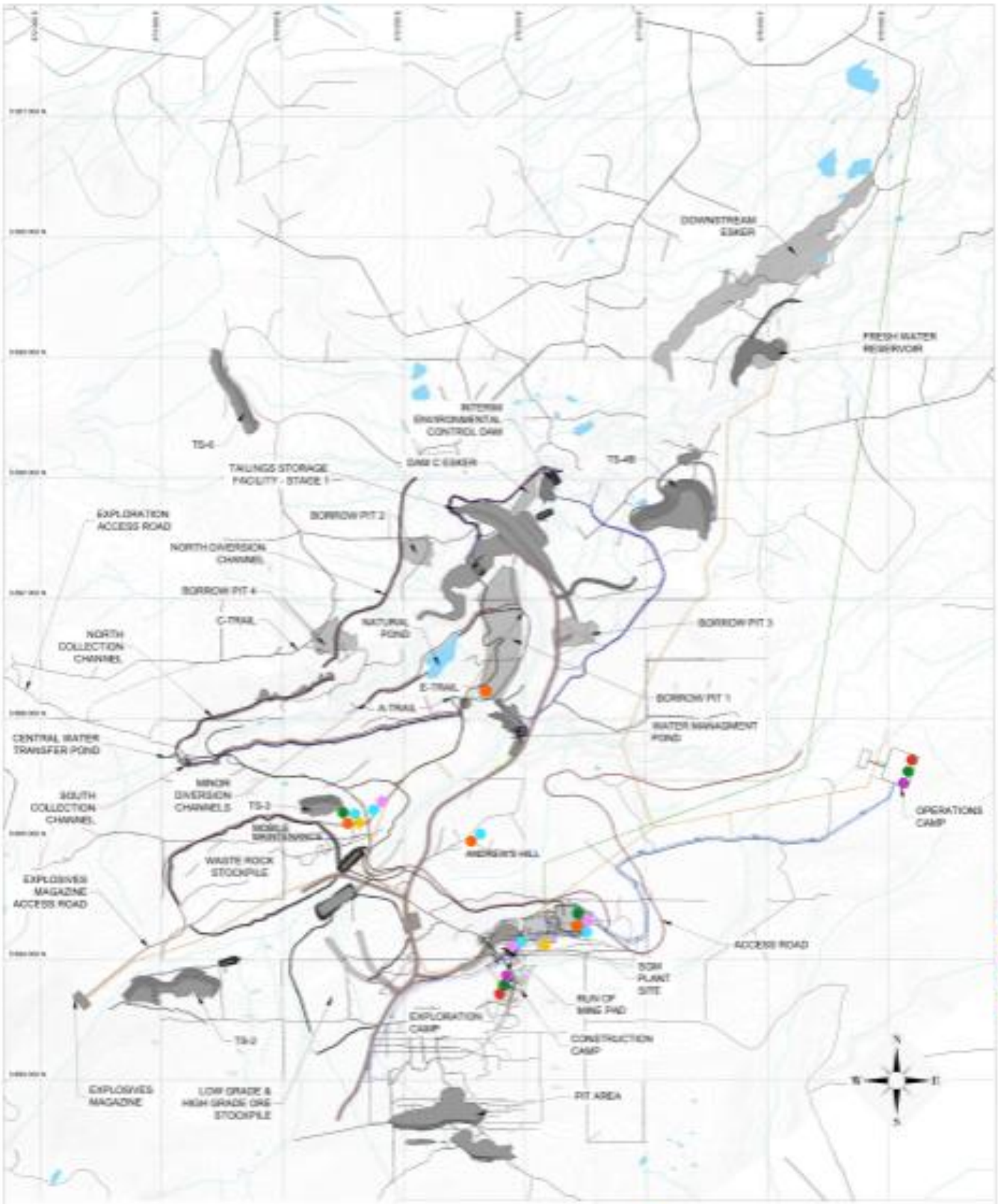
BC MOH. 2017. *BC Guidelines for Industrial Camps Regulation*. Prepared by Health Protection Branch, Ministry of Health. https://www2.gov.bc.ca/assets/gov/health/keeping-bc-healthy-safe/industrial-camps/bc_guidelines_for_industrial_camps_regulation.pdf*.*

CEA Agency. 2019. *Decision Statement Issued under Section 54 of the Canadian Environmental Assessment Act, 2012* to New Gold Inc. c/o Ryan Todd, Director, Blackwater Project Sunlife Plaza Suite 610, 1100 Melville Street Vancouver, British Columbia V6E 4A6 for the Blackwater Gold Project.

EC. 2010. *Technical Document for Batch Waste Incineration.*

Appendix A Mine Site Waste Transfer Areas Plan


DOWNSTREAM ESKER
FRESH WATER RESERVOIR
INTERIM ENVIRONMENTAL CONTROL DAM
TS-6
DAM C ESKER
TS-4B
TAILINGS STORAGE FACILITY - STAGE 1
EXPLORATION ACCESS ROAD
BORROW PIT 2
NORTH DIVERSION CHANNEL
BORROW PIT 4
C-TRAIL
NATURAL POND
NORTH COLLECTION CHANNEL
BORROW PIT 3
E-TRAIL
A-TRAIL
BORROW PIT 1
WATER MANAGEMENT POND
CENTRAL WATER TRANSFER POND
MINOR DIVERSION CHANNELS
SOUTH COLLECTION CHANNEL
TS-3
MOBILE MAINTENANCE
OPERATIONS CAMP
ANDESITE HILL
WASTE ROCK STOCKPILE
EXPLOSIVES MAGAZINE ACCESS ROAD
ACCESS ROAD
SOM PLANT SITE
RUN OF MINE PAD
EXPLORATION CAMP
CONSTRUCTION CAMP
TS-2
EXPLOSIVES MAGAZINE
LOW GRADE & HIGH GRADE ORE STOCKPILE
PIT AREA
N
W
E
S
LEGEND
Scrap Metal Bin
General Construction Waste Bin
Hazardous Waste
Bottle Recycling
Domestic Waste
Cardboard Recycling
Wood Waste
Lakes
Rivers & Streams
Light Vehicle Access Roads
Exploration Trails
Major interval: 25m, Minor interval: 5m
ARTEMIS GOLD INC
Blackwater Mine
General Overview Y-1
McElhanney
Drawing Number
BWST1-0000-CIV-GAD-0001_02
Scale: 1:10,000
100 0 100 200 300 400 500

BRITISH COLUMBIA | Ministry of Environment and Climate Change Strategy

Declaration of Competency

The Ministry of Environment and Climate Change Strategy relies on the work, advice, recommendations and in some cases decision making of qualified professionals[1], under government's professional reliance regime. With this comes an assumption that professionals who undertake work in relation to ministry legislation, regulations and codes of practice have the knowledge, experience and objectivity necessary to fulfill this role.

1. Name of Qualified Professional: Rolf Schmitt

   Title: Technical Consulting Director - Permitting and Geoscience

2. Are you a registered member of a professional association in B.C.? ☑ Yes ☐ No

   Name of Association: Engineers and Geoscientists BC Registration #: 19824

3. Brief description of professional services:

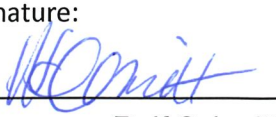
   Directed and oversaw the annual review and update of the Blackwater Gold Mine Waste Management Plan.

This declaration of competency is collected under section 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of increasing government transparency and ensuring professional ethics and accountability. By signing and submitting this statement you consent to its publication and its disclosure outside of Canada. This consent is valid from the date submitted and cannot be revoked. If you have any questions about the collection, use or disclosure of your personal information please contact the Ministry of Environment and Climate Change Strategy Headquarters Office at 1-800-663-7867.

Declaration

I am a qualified professional with the knowledge, skills and experience to provide expert information, advice and/or recommendations in relation to the specific work described above.

Signature:

X 

Print Name: Rolf Schmitt

Witnessed by:

X 

Print Name: Lorraine Muckian

Date signed: April 30, 2026

[1] *Qualified Professional, in relation to a duty or function under ministry legislation, means an individual who*

- *a) is registered in British Columbia with a professional association, is acting under that organization's code of ethics, and is subject to disciplinary action by that association, and*
- b) *through suitable education, experience, accreditation and knowledge, may reasonably be relied on to provide advice within his or her area of expertise, which area of expertise is applicable to the duty or function.*

BRITISH COLUMBIA | Ministry of Environment and Climate Change Strategy

Conflict of Interest Disclosure Statement

A qualified professional [1] providing services to either the Ministry of Environment and Climate Change Strategy ("ministry"), or to a regulated person for the purpose of obtaining an authorization from the ministry, or pursuant to a requirement imposed under the *Environmental Management Act,* the *Integrated Pest Management Act* or the *Park Act* has a real or perceived conflict of interest when the qualified professional, or their relatives, close associates or personal friends have a financial or other interest in the outcome of the work being performed.

A real or perceived conflict of interest occurs when a qualified professional has

a) an ownership interest in the regulated person's business;

b) an opportunity to influence a decision that leads to financial benefits from the regulated person or their business other than a standard fee for service (e.g. bonuses, stock options, other profit sharing arrangements);

c) a personal or professional interest in a specific outcome;

d) the promise of a long term or ongoing business relationship with the regulated person, that is contingent upon a specific outcome of work;

e) a spouse or other family member who will benefit from a specific outcome; or

f) any other interest that could be perceived as a threat to the independence or objectivity of the qualified professional in performing a duty or function.

Qualified professionals who work under ministry legislation must take care in the conduct of their work that potential conflicts of interest within their control are avoided or mitigated. Precise rules in conflict of interest are not possible and professionals must rely on guidance of their professional associations, their common sense, conscience and sense of personal integrity.

Declaration

I Rolf Schmitt, as a member of Engineers and Geoscientists BC
(Print First and Last Name) (Print Name of Professional Association)
declare

Select one of the following:

☑ Absence from conflict of interest

Other than the standard fee I will receive for my professional services, I have no financial or other interest in the outcome of this Blackwater Gold Mine – Waste Management Plan.
I further declare that should a conflict of interest arise in the future during the course of this work, I will fully disclose the circumstances in writing and without delay to Breanne Hill, erring on the side of caution.
(Print Ministry Contact Name)

BRITISH COLUMBIA | Ministry of Environment and Climate Change Strategy

☐ Real or perceived conflict of interest

Description and nature of conflict(s):

_____

_____

_____

I will maintain my objectivity, conducting my work in accordance with my Code of Ethics and standards of practice.

In addition, I will take the following steps to mitigate the real or perceived conflict(s) I have disclosed, to ensure the public interest remains paramount:

_____

_____

_____

Further, I acknowledge that this disclosure may be interpreted as a threat to my independence and will be considered by the statutory decision maker accordingly.

This conflict of interest disclosure statement is collected under section 26(c) of the *Freedom of Information and Protection of Privacy Act* for the purposes of increasing government transparency and ensuring professional ethics and accountability. By signing and submitting this statement you consent to its publication and its disclosure outside of Canada. This consent is valid from the date submitted and cannot be revoked. If you have any questions about the collection, use or disclosure of your personal information please contact the Ministry of Environment and Climate Change Strategy Headquarters Office at 1-800-663-7867.

Signature:

X _____

Print name: Rolf Schmitt

Witnessed by:

X _____

Print name: Lorraine Muckian

Date: April 30, 2026

[1]*Qualified Professional, in relation to a duty or function under ministry legislation, means an individual who*

a) is registered in British Columbia with a professional association, is acting under that organization's code of ethics, and is subject to disciplinary action by that association, and

b) *through suitable education, experience, accreditation and knowledge, may reasonably be relied on to provide advice within his or her area of expertise, which area of expertise is applicable to the duty or function.*