



Blackwater
Mine



Air Quality and Fugitive Dust Management Plan

June 2026

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Work Instructions

Air Quality and Fugitive Dust Management Plan

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Acronyms and Abbreviations

µm	Microns
AAQO	Ambient Air Quality Objective
AMCP	Accidents and Malfunctions Administration and Communication Plan
Application or Joint MA/EMA Application	Joint <i>Mines Act / Environmental Management Act</i> Permits Application
AQFDMP	Air Quality and Fugitive Dust Management Plan
AQO	Air Quality Objective
Artemis	Artemis Gold Inc.
BC	British Columbia
BMP	Best Management Practices
BW Gold or Proponent	BW Gold Ltd.
CAAQs	Canadian Ambient Air Quality Standards
CCME	Canadian Council of Ministers of the Environment
CEAA	Canadian Environmental Assessment Agency
CEO	Chief Executive Officer
CFM	Community Feedback Mechanism
CFMP	Country Foods Monitoring Plan
CM	Construction Manager
CO	Carbon monoxide
COO	Chief Operating Officer
CPD	Certified Project Description
DS	Decision Statement
EAC or Certificate	Environmental Assessment Certificate
EAO	Environmental Assessment Office
EC	Environment Canada
ECCC	Environment and Climate Change Canada
ECD	Environmental Control Dam
ELoMC	Environmental Life of Mine Committee
EMA	<i>Environmental Management Act</i>
EMLI	Ministry of Energy, Mines and Low Carbon Innovation

EMP	Environmental Management Plan
EMPR	Ministry of Energy, Mines and Petroleum Resources
ENV	Ministry of Environment and Climate Change Strategy
EPCM	Engineering, Procurement and Construction Management
FSR	Forest Service Road
FUP	Follow-up Program
GM	General Manager
h	Hour
ha	Hectares
HC	Health Canada
HHRA	Human Health Risk Assessment
HVAC	Heating, ventilation and air conditioning
IAAC	Impact Assessment Agency of Canada
Indigenous groups or Aboriginal Peoples	Ulkatcho First Nation, Lhoosk'uz Dené Nation, Nadleh Whut'en First Nation, Stellat'en First Nation, Saik'uz First Nation, Nazko First Nation, Skin Tyee Nation, T̓silhqot'in Nation, Métis Nation British Columbia, and Nee-Tahi-Buhn Band (as defined in the Project's federal Decision Statement)
Indigenous nations	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Stellat'en First Nation, Saik'uz First Nation, and Nazko First Nation (as defined in the Blackwater Mine's Environmental Assessment Certificate #M19-01)
km	Kilometre
KP	Knight Piésold Ltd.
LGO	Low grade ore
LoM	Life of Mine
MAR	Mine Access Road
masl	Metres above sea level
MCM	Ministry of Mining and Critical Minerals
ME	Manager - Environment
MOE	Ministry of Environment
MOH	Ministry of Health
MP	Management plan
Mt	Million tonnes
Mtpa	Million tonnes per annum

NAAQOs	National Ambient Air Quality Objectives
New Gold	New Gold Inc.
NHA	Northern Health Authority
NOx	Nitrogen oxides
OVB	Overburden
PASS	Passive Air Sampling System
PM	Particulate matter
PMA	Permitted Mine Area
POC	Parameter of concern
POPC	Parameter of potential concern
Project	Blackwater Gold Project
QA/QC	Quality control/quality assurance
QRP	Qualified Registered Professional
ROW	Right of Way
SO₂	Sulphur dioxide
SOP	Standard operating procedure
t	Tonne
Tatelkus Lake 28	Tatelkus Lake Indian Reserve 28
the Mine	The Blackwater Mine
TRP	Trigger Response Plan
TSF	Tailings Storage Facility
VP	Vice President
WMMP	Wildlife Management and Monitoring Plan

1.0 Mine Overview

1.1 Blackwater Gold Mine

BW Gold Ltd. (BW Gold) has developed the Blackwater Mine (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 (Figure 1.1-1). The Mine is currently accessed via the Kluskus Forest Service Road (FSR), the Kluskus-Ootsa FSR, and an exploration access road, which connects to the Kluskus-Ootsa FSR at km 142. The Kluskus FSR joins Highway 16 approximately 10 km west of Vanderhoof.

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

Electrical power is supplied by an approximately 135 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 million tonnes per annum (Mtpa) until the end of the 23-year life of mine (LoM).

1.2 Physical Location and Access

The Mine falls within NTS map sheet 93F/02, centred at 5,893,000 mN and 375,400 mE (UTM Zone 10 NAD83). The mine site is centred at 53°11'22.872" N and 124°52'0.437" W.

Figure 1.1-1 identifies the Mine location and the access route from Vanderhoof in relation to nearby communities.

1.3 Proponent

BW Gold is a wholly owned subsidiary of Artemis Gold Inc. (Artemis), a publicly traded company listed on the TSX Venture Exchange (TSX-V: ARTG; <https://www.artemisgoldinc.com>). Artemis and BW Gold are incorporated in BC (#71616 9511 and #73237 6876 respectively).

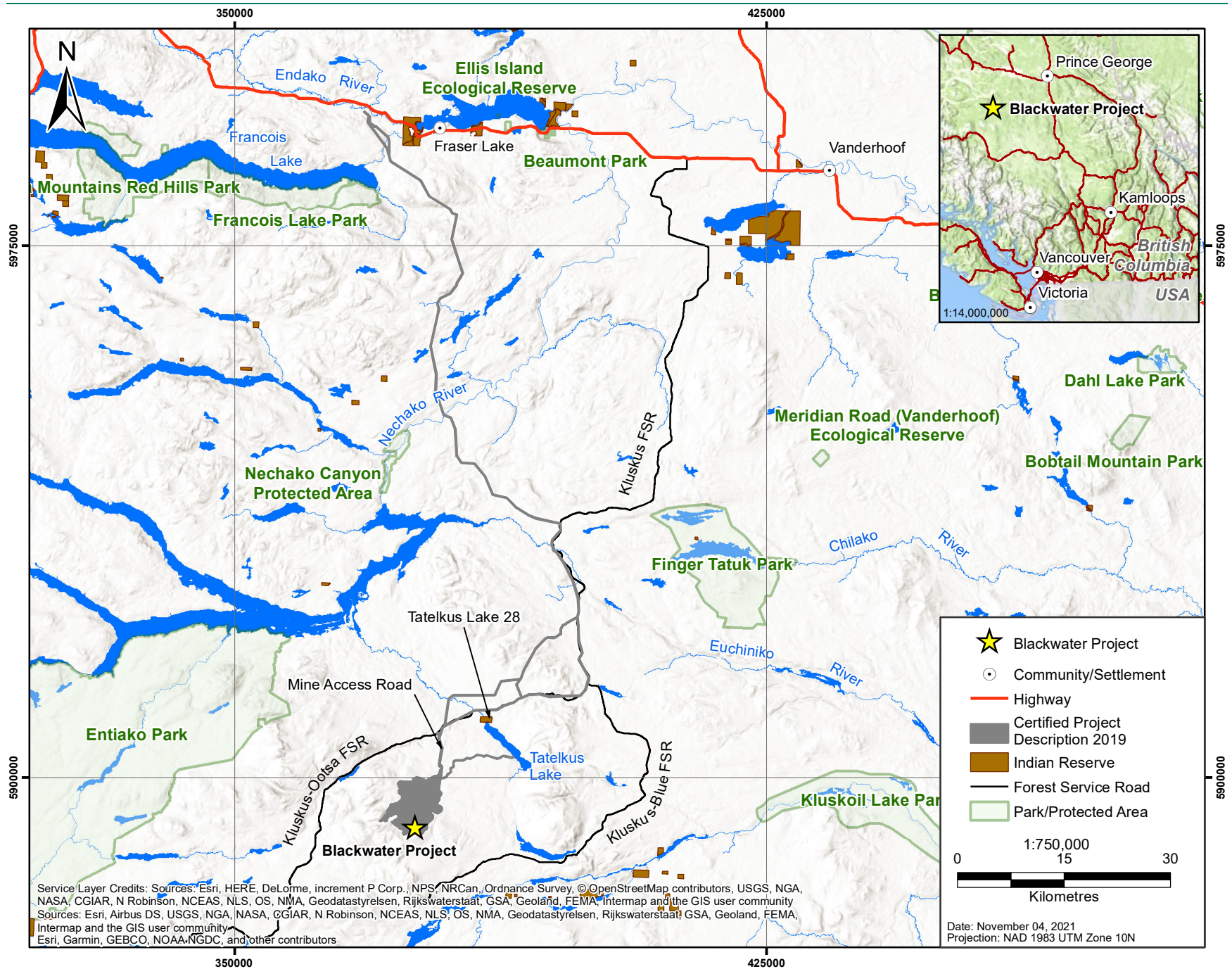


Figure 1.1-1: Blackwater Project Location

The BW Gold corporate office is in Vancouver, BC:

Physical Mailing Address: Suite 3083—595 Burrard Street, Vancouver BC V7L 1L3
Telephone: (604) 558-1107
General Email: info@artemisgoldinc.com

The Blackwater Mine community office is in Vanderhoof, BC:

Physical Mailing Address: 139—1st Street, P.O. Box 440
Mailing Address: P.O. Box 440, Vanderhoof BC V0J 3A0
Telephone: (250) 567-3276
General Email: office.blackwater@artemisgoldinc.com

1.4 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 (BC Environmental Assessment Office [EAO] 2019a, 2019b).

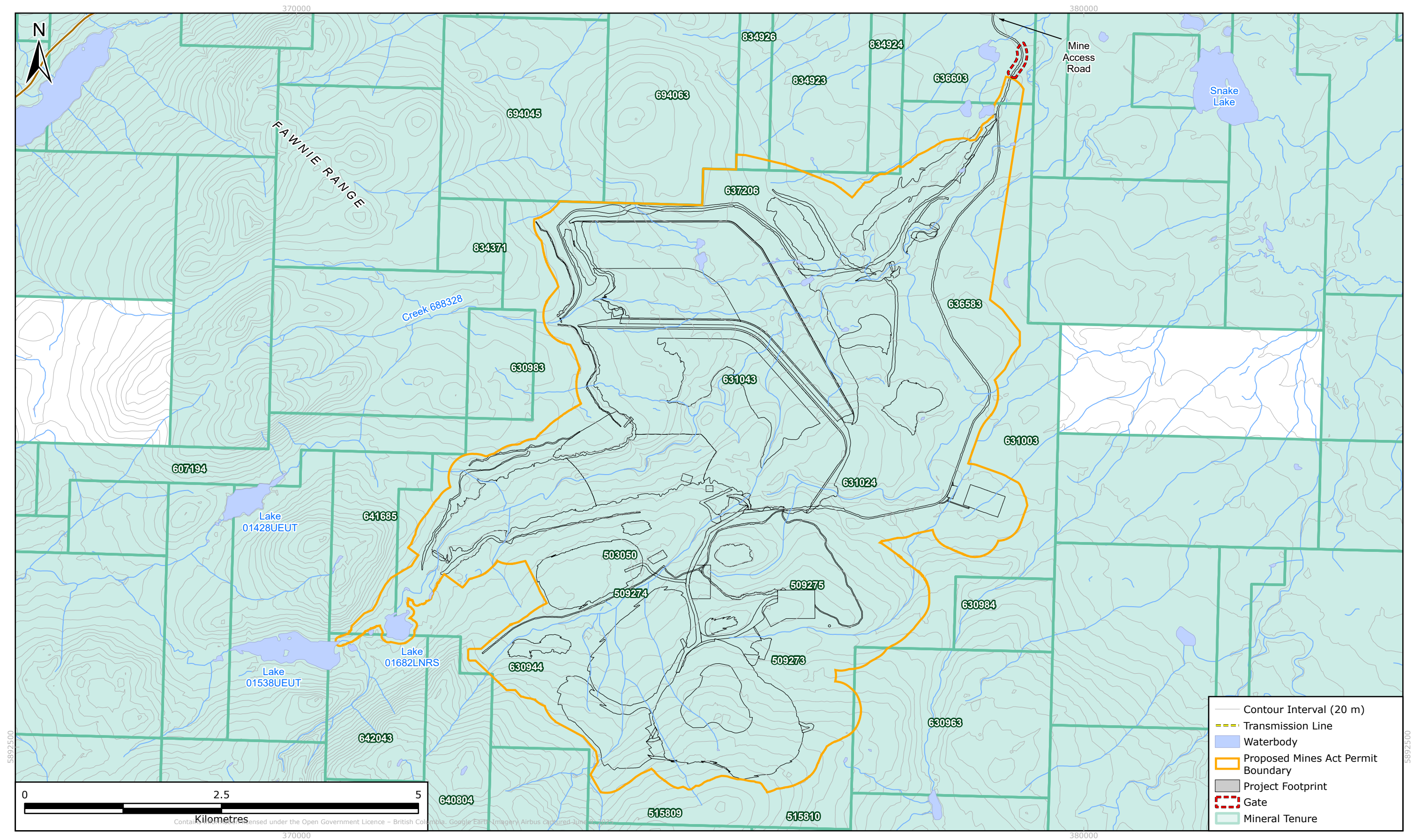
1.5 Permits and Mineral Tenures

Surface and subsurface rights over the Mine area are controlled by the Crown. BW Gold holds a 100% recorded interest in 328 mineral claims covering an area of 148,688 hectares (ha) distributed among the Blackwater, Capoose, Auro, Key, Parlane, and RJK claim blocks (Artemis 2020). The Mine site is located within the Blackwater claim block. Figure 1.5-1 identifies the mineral tenures within the proposed *Mines Act* permit boundary.

The Mine received an EAC (M19-01) on June 21, 2019, under the BC *Environmental Assessment Act* (2002), and an Environmental Assessment Decision Statement (DS) on April 15, 2019, under the *Canadian Environmental Assessment Act, 2012* (2012), approving the Mine with conditions under New Gold Inc. (New Gold). In August 2020, Artemis acquired the mineral tenures, assets, and rights in the Blackwater Mine that were previously held by New Gold. On August 7, 2020, the EAC was transferred to BW Gold under the BC *Environmental Assessment Act* (2018), and on March 8, 2023, BW Gold received the Joint Application for *Mines Act* / *Environmental Management Act* Permits 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) Effluent Discharge Permit 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 Air Discharge Permit 110650 authorizing discharge of air contaminants to the atmosphere and EMA Effluent Discharge Permit 110652 authorizing discharge of effluent to surface and groundwater from the Mine. Permits are updated as needed, based on changing regulations, conditions, and requirements.

FIGURE 1.5-1 BLACKWATER MINERAL TENURES WITHIN PROPOSED *MINES ACT* PERMIT BOUNDARY



2.0 Management Plan Overview

2.1 Purpose and Objectives

The intent of the Air Quality and Fugitive Dust Management Plan (AQFDMP) is to identify measures to minimize the effects of the Mine's air emissions on human health and the natural environment. The AQFDMP identifies the Mine's fugitive emission sources and mitigation measures aimed at effectively controlling fugitive emissions. However, air quality and fugitive dust information is shared with other programs and can be used as an input to human health risk assessment.

The purpose of the AQFDMP is to meet the following conditions of the BW Gold Mine regulatory approvals:

- Environmental Assessment Certificate (EAC) #M19-01 Conditions 1, 2, 3, 4, and 20;
- Canadian Environmental Assessment Agency (CEAA) Decision Statement (DS) Conditions 6.1, 6.3, 6.12, and 6.15;
- *Environmental Management Act* Permit PA-110650 (April 22, 2026) Condition 4.2; and
- *Mines Act* Permit M-246 (April 8, 2026) Condition 10.

The objectives of the AQFDMP are to:

- Identify potential sources and activities which may generate air emissions and fugitive dust;
- Characterize and quantify fugitive dust emission sources;
- Establish framework to minimize dust generation through the implementation of site-specific Best Management Practices (BMPs);
- Identify mitigation measures (and contingencies) to reduce the potential effects of air emissions on human health and the natural environment;
- Implement monitoring program to evaluate the effectiveness of mitigation measures are effective and air quality objectives are being achieved;
- Establish and apply trigger-action-response framework; and
- Adaptive management to implement additional or modified mitigation measures where monitoring results indicate that triggers or objectives are not being achieved.

As described, this AQFDMP satisfies multiple regulatory instruments/agencies. Therefore, throughout the document and in concordance tables (listed below), the applicable instruments and agencies have been identified, and it is our understanding that regulatory agencies (including inspectors and the Independent Environmental Monitor) will apply focus to the components of the plan applicable to their instruments.

Concordance tables identify where the requirements in:

- EAC Conditions are met and provided in Appendix A;
- DS Conditions are met and are provided in Appendix B; and
- Technical Guidance on Developing a Fugitive Dust Management Plan for Mines in BC, referred to as the Guidance herein after (BC Ministry of Energy, Mines and Low Carbon Innovation [EMLI] and Ministry of Environment and Climate Change Strategy [ENV] 2023) are met and are provided in Appendix C.

The concordance tables have been developed for the purposes of compliance determination for each agency (e.g., ENV, EMLI, Impact Assessment Agency of Canada [IAAC], and EAO) understanding where the specific authorization requirements are documented.

2.2 Exclusions

Consistent with the Guidance (BC EMLI and ENV 2023), the AQFDMP does not address occupational health and safety requirements pertaining to workplace exposures to dust. Worker health and safety at mine sites is regulated by the Health, Safety and Reclamation Code for Mines in British Columbia (EMLI 2024). The Mine’s Occupational Health and Safety Program is provided under a separate cover.

Offsite infrastructure, such as portions of the FSR, that are not included in the project as defined by the Certified Project Description (CPD), in the in the EAC, the Designated Project Area in the Federal DS, the Permitted Mine Area (PMA) under the M-246, and the approved features shown in the site plan A/B of PA-110650, are excluded from the scope of the AQFDMP.

2.3 Roles and Responsibilities

BW Gold has the obligation of ensuring all commitments are met and that all relevant commitments are made known to mine personnel and site contractors during all phases of the Mine life. Employees contribute to this responsibility and some of the key roles are listed in Table 2.3-1. Note that during Closure and Post-Closure, staffing levels, will be reduced to align the level of activity associated with these phases and therefore some positions may be eliminated.

Table 2.3-1: Blackwater Gold Roles and Responsibilities

Role	Responsibilities
Mine Manager	The Mine Manager, as defined in the <i>Mines Act</i> (1996), has overall responsibility for mine operations, including the health and safety of workers and the public, EMS implementation, overall environmental performance and protection, and permit compliance. The Mine Manager may delegate their responsibilities to qualified personnel. The Mine Manager reports to the Chief Executive Officer.
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.

Role	Responsibilities
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.
Area Superintendent	The Area Superintendent or delegate (i.e., an operations or construction superintendent responsible for work areas with unpaved roads, such as Mine Operations, Infrastructure, or Earthworks Superintendents) is responsible for initiating corrective actions when Response Plan trigger thresholds are exceeded within their areas of responsibility. This includes directing and ensuring implementation of appropriate mitigation measures for fugitive dust associated with unpaved roads, surface earthworks, and other dust-generating activities.
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.

2.4 Related Documents

The following documents have connections to the AQFDMP.

- Country Foods Monitoring Plan (CFMP) and the Wildlife Mitigation and Monitoring Plan (WMMP)
 - EAC #M19-01 Condition 20 requires the AQFDMP to indicate how this plan informs the Country Foods Monitoring Plan (CFMP) and the Wildlife Mitigation and Monitoring Plan (WMMP).
 - The CFMP and WMMP will be evaluated for updates and revisions if corrective actions to reduce contaminant concentrations to avoid adverse health effects to receptors are implemented, based on exceedances of contaminants of potential concern (COPC) and corresponding concentrations (triggers) based on monitoring data from implementing the AQFDMP, when compared to BC objectives (Entia 2021).
 - Fugitive dust deposition monitoring is not recommended by the Ministry of Environment and Climate Change Strategy (ENV) for the purposes of wildlife and human health protection (ENV 2020) and is not included in the AQFDMP. However, as required by EAC Condition 41, analysis of dust for metal concentrations will be included in the CFMP and data collected under the CFMP can be used to inform the WMMP.
 - Monitoring of trace element (metals) uptake in vegetation and soils is considered in the Reclamation and Closure Plan and the CFMP. Plant tissue can be affected by the deposition of dust containing metals generated by Mine activities. Plants can also accumulate metals from the

soil through uptake of metals through the root. Monitoring under the CFMP will determine whether concentrations of metals have changed in soil or in vegetation tissue because of Mine activities. The results of trace metals monitoring and potential implications for wildlife based on results from monitoring under the CFMP will be addressed in the WMMP.

- Results of the AQFDMP for monitoring of particulate matter (Section 6.1.3) will inform the CFMP, as this monitoring is required by EAC Condition 41 for the CFMP.
- Trigger Response Plan (TRP), referred to as Trigger Action Response Plan (TARP) in the Guidance
 - Within the AQFDMP, the TRP provides a structured framework that links monitoring results to predefined mitigation actions, enabling timely and consistent management of fugitive dust emissions. This includes specific triggers, actions to be taken, and reporting protocols.
- Accidents and Malfunctions Administration and Communication Plan
 - AMCP outlines requirements for notification, reporting, and communication with regulators, Indigenous Groups, and the public in the event of accidents, malfunctions, or exceedances that may result in adverse environmental effects. Where monitoring under the AQFDMP identifies exceedances of applicable triggers or thresholds, notification and reporting will be carried out in accordance with the AMCP.

2.4.1 Training and Awareness

Employees and contractors will receive awareness-level training in fugitive dust management and air quality on their arrival through the 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. A refresher training will be provided to employees and contractors on an annual basis. Refresher training may take the form of periodic re-training through tailgate and safety meetings.

2.5 Engagement and Consultation

This plan was developed in consultation with ENV, the Ministry of Energy, Mines and Petroleum Resources (EMPR, now Ministry of Mining and Critical Minerals [MCM]), Northern Health Authority (NHA), and Aboriginal Groups / Indigenous Groups and was approved for implementation by the EAO on February 18, 2022.

This version is being submitted as per Condition 4.2.2 of PA-110650, and is being provided to ENV, MCM, NHA, Aboriginal Groups / Indigenous Groups, the EAO, and the Environmental Life of Mine Committee (ELoMC). Any comments received will be addressed as directed by ENV or will be responded to and the plan updated during the next review period (i.e., by March 31, 2027), and updated, as applicable, by April 30, 2027.

2.5.1 Community Feedback Mechanism

Pursuant to DS Condition 6.3, BW Gold has established the [Community Feedback Mechanism](https://www.artemisgoldinc.com/blackwater-community/community-feedback-mechanism/) (CFM) (<https://www.artemisgoldinc.com/blackwater-community/community-feedback-mechanism/>) (Artemis Gold 2026a) for receiving complaints related to exposure to dust from “Designated Project” (as described in section 2 of the environmental assessment report prepared by the CEAA (CEAA 2019)) during construction, operation and decommissioning.

Also pursuant to DS Condition 6.3, as well as M-246 Condition C.10.(a)(iv) which is applicable to the PMA, the CFM establishes procedures for responding to and addressing complaints, as described in the “Complaints Resolution Process” in Section 3.3 of the Community Effects Monitoring and Management Plan ([Blackwater Goldmine - Public Plans & Reports](#)) (Artemis Gold 2026b).

3.0 Air Emission Sources

3.1 Overview of Air Emission Sources and Facility

The Mine has a combination of both non-fugitive and fugitive sources. Non-fugitive sources at the Mine are controlled, point-source emissions that are discharged to the atmosphere through defined system such as stacks and vents. For the Mine, non-fugitive sources include dust emissions through dust collectors, mine fleet exhaust, backup diesel generators and diesel-fired putrescible waste incinerator.

Fugitive sources are emissions that are not released through a defined discharge point. Fugitive dust is the primary source of air emissions at the Mine and is generated through activities that disturb, handle, or transport materials, as well as through wind erosion of exposed surfaces. The Mine includes key components such as the open pit, processing plant, TSF, stockpiles, borrow and aggregate areas, and associated site infrastructure, all of which have the potential to generate fugitive dust. These emissions occur throughout the mining and processing sequence, including material extraction from the open pit, hauling and processing at the plant site, and deposition of tailings in the TSF, as well as during material handling at stockpiles and construction-related activities across the Mine site. The general arrangement of the proposed mine site at Year +23 (full mine buildout) is shown in Figure 3.1-1.

3.2 Identification of Fugitive Dust Emission Sources

Activities associated with air quality and fugitive dust emission sources occur across multiple Mine phases, and the nature and magnitude of fugitive dust generation varies over the life of the Mine due to changes in the extent of surface disturbance, operational intensity, and the type of activities occurring during each phase.

- **Construction:** Dust generation is primarily associated with activities that disturb previously undisturbed areas, including land clearing, earthworks, and infrastructure development.
- **Operations:** Dust generation is sustained through ongoing mining and material handling activities at the open pit, processing plant, Tailings Storage Facility (TSF), and stockpiles.
- **Closure / Post-Closure:** Operational activities are reduced, resulting in a general decrease in dust generation. However, fugitive dust may continue to be generated from wind erosion of exposed surfaces until these areas are stabilized or reclaimed.

Dust generation is influenced by environmental and site-specific conditions such as wind speed and direction, precipitation, temperature, and material moisture content. Dust generation generally increases during dry, windy, and frozen conditions and decreases during periods of precipitation or when materials are moist. Site-specific meteorological conditions indicate that prevailing winds are predominantly from the west and southwest, with seasonal variation in wind speed and direction influencing the potential for fugitive dust generation and transport. These patterns are illustrated in Figure 3.2-1 (Blackwater Low Station Wind Rose) and Figure 3.2-2 (Blackwater High Station Wind Rose).

FIGURE 3.1-1 MINE SITE GENERAL ARRANGEMENT (YEAR +23)

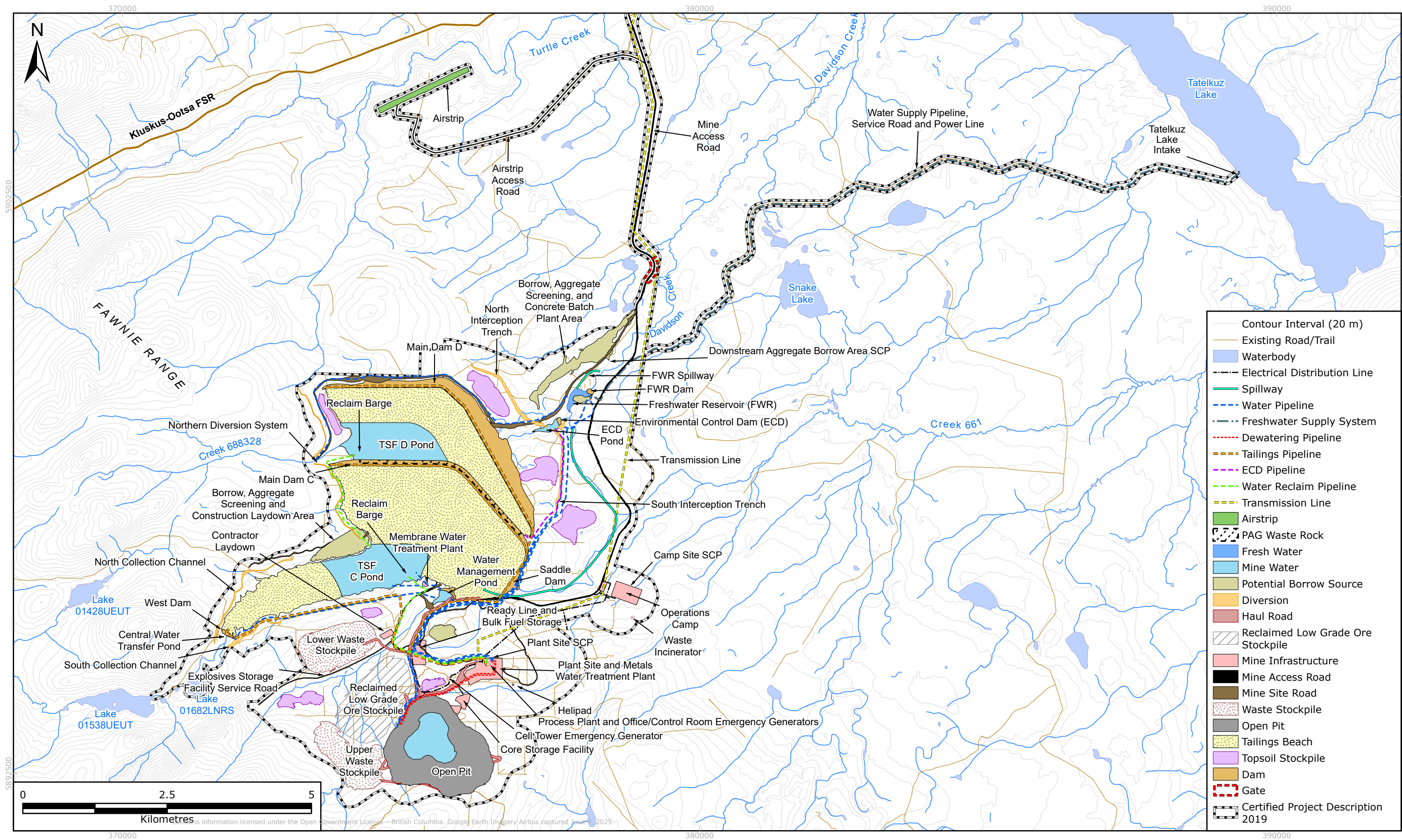
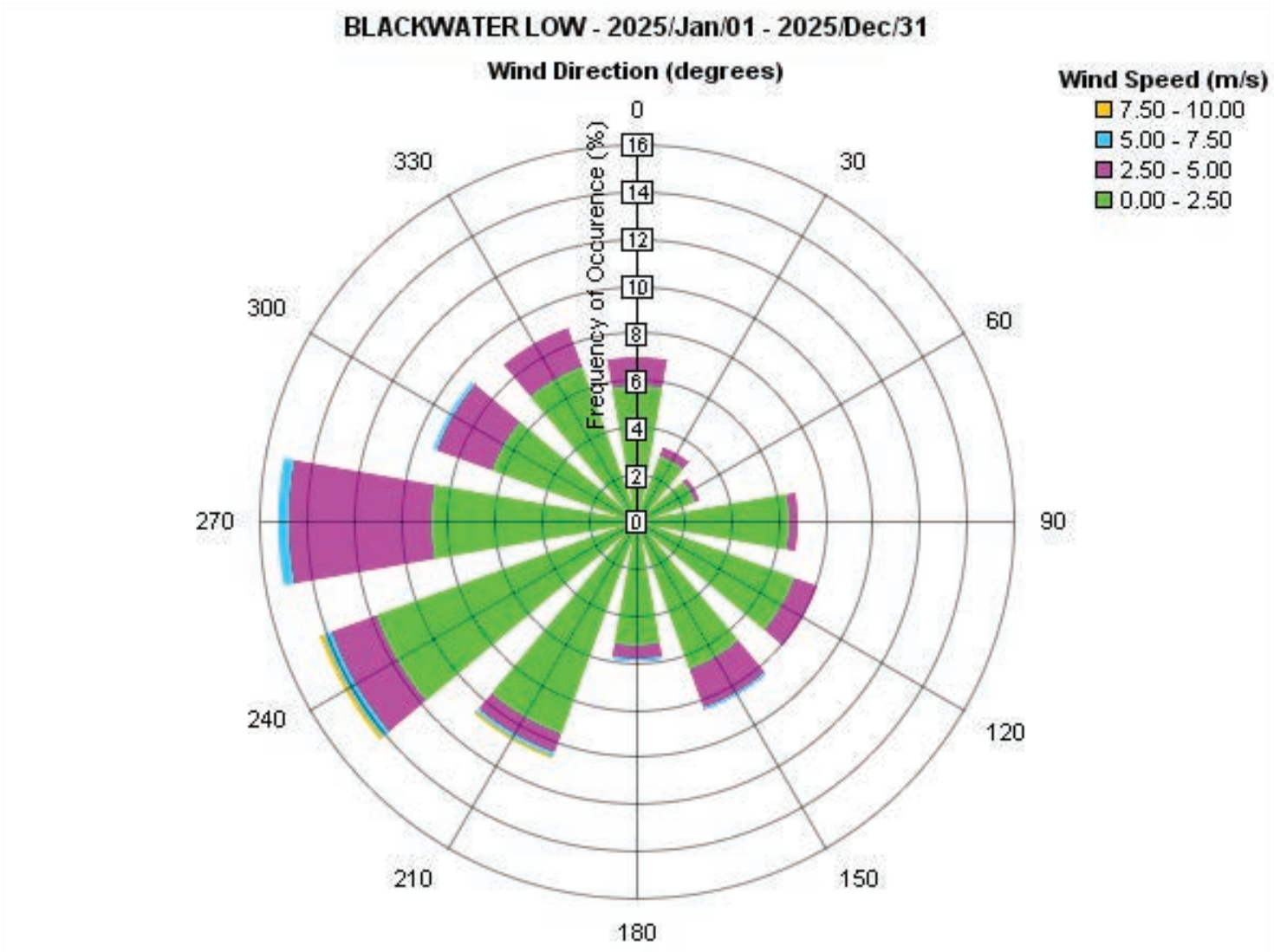


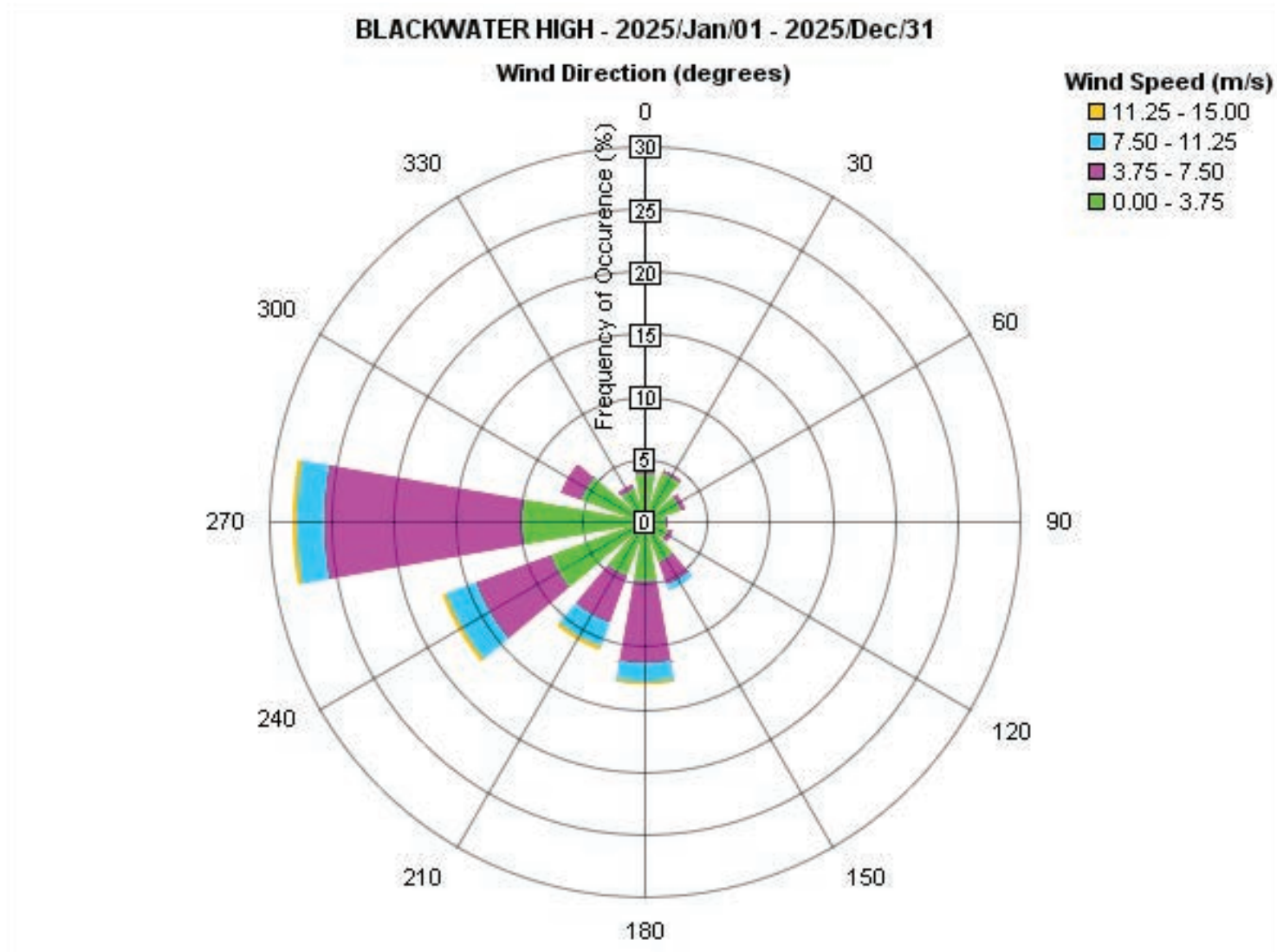
FIGURE 3.2-1 BLACKWATER LOW STATION WIND ROSE



Source: Knight Piésold Consulting (2026)

- NOTES:
1. THE PREVAILING WIND DIRECTION IS THE ONE WITH THE LONGEST SPOKE (HIGHEST PERCENTAGE).

FIGURE 3.2-2 BLACKWATER HIGH STATION WIND ROSE



Source: Knight Piésold Consulting (2026)

- NOTES:
1. THE PREVAILING WIND DIRECTION IS THE ONE WITH THE LONGEST SPOKE (HIGHEST PERCENTAGE).

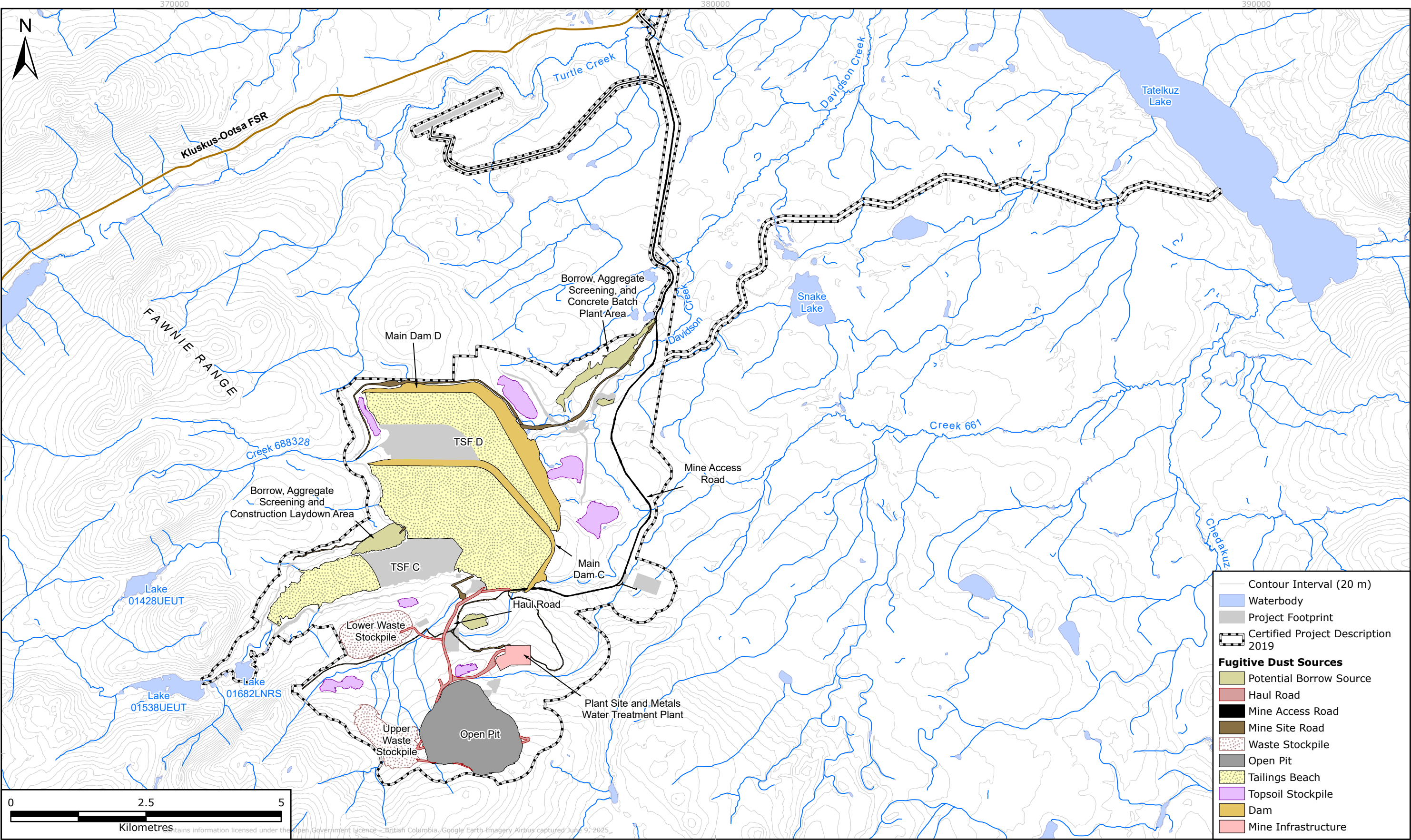
3.3 Detailed List of Air Emission Sources

As per EMA PA-110650 Section 4.2.4 (a) identification and detailed description of all dust-emitting sources are specified. Table 3.3-1 provides a detailed list and description of emission sources and descriptions. Locations of emission sources are shown on Figure 3.3-1 (Project Components with Potential to Generate Fugitive Dust).

Table 3.3-1: Air Emissions Sources by Mine Component

Source of Emission	Description
Unpaved Roads	Located across the Mine (Figure 3.3-1), during above 0 degrees Celsius use of unpaved surfaces including access (e.g., Mine Access Road, a 2 km section of the existing Kluskus-Ootsa Forest Service Road, Airstrip Access Road), mine site roads and roads within the transmission line right-of-way (ROW) used for maintenance of the transmission line. Fugitive dust is generated from aggregate.
Surface Earthworks	Located across the Mine (Figure 3.3-1), land clearing and earthworks (e.g., grading, dumping, land forming, soil stockpile rehandling) generate fugitive dust from soil, overburden (OVB), and aggregate during above 0°C conditions.
Production Drilling	Located in the open pit (Figure 3.2-2), drilling of blast holes generates fugitive dust from ore, waste rock, and overburden. Occurs under all conditions.
Production Blasting	Located in the open pit (Figure 3.3-1), detonation of explosives generates fugitive dust from ore and waste rock. Occurs under all conditions.
Material Handling and Transfer Locations	Material handling/re-handling locations including the open pit, borrow areas, transient stockpiles, concrete batch plant stockpile, Lower and Upper Waste stockpiles, LGO and topsoil stockpiles (Figure 3.3-1).
Transient Stockpiles	Located throughout the Mine site (Figure 3.3-1), temporary stockpiles and material transfer via aggregate screens and conveyors generate fugitive dust from aggregate and ore.
Concrete Batch Plant	Located at the plant site (Figure 3.3-1), material handling during batching generates fugitive dust from cement and aggregate. Active during construction and intermittent use thereafter.
LGO Stockpile	Located at the Mine site (Figure 3.3-1), wind erosion, material handling and rehandling generate fugitive dust from ore.
Topsoil Stockpiles	Located at the Mine site (Figure 3.3-1), wind erosion, material handling generate fugitive dust from topsoil.
Plant Site	Located at the processing plant. Generate dust emissions by mechanical crushing, screening, conveying, ore processing activities, wind erosions, and material handling Most sources are equipped with mitigation measures already built in, such as the use of dust collectors and scrubbers.
Primary Crusher Dust Collector	
Conveyors	
Screening Equipment	
Dust Collectors	
Secondary and Tertiary Crushers	
Dust Collector	
Crushed Ore Stockpile	
Lime Silo Dust Collector	
Lime Silo Wet Scrubber	
Cyanide Prep Area Dust Collector	
Copper Sulphate Mix Tank	
Dust Collector	
Fire Assay Sample Prep	
Dust Collector	
Fire Assay Lab Dust Collector / Furnace Exhaust	
Reclaim Tunnel	
TSF Beach	Located at the TSF, wind erosion, generates fugitive dust from overburden, waste rock, aggregate, and tailings. Dust generation increases during low material submersion, windy, dry, hot days or extremely cold weather.
Open Burn Pit(s)	An open burn pit is utilized to burn Wood Waste and Associated Products.. The open burn pit will operate up to 48 hours per burn. Open burning will be located >1 km from camp accommodations and >200 m from buildings as well as any onsite water bodies.
Vehicles	Tailpipe exhaust emissions from mobile equipment and vehicles throughout the Mine contributes to SO ₂ , NO ₂ , CO, PM ₁₀ and PM _{2.5} emissions.
Loads in Transit in Open Beds	Emissions of fugitive dust through material handling.

FIGURE 3.3-1 PROJECT COMPONENTS WITH POTENTIAL TO GENERATE FUGITIVE DUST



4.0 Best Management Practices and Mitigation Measures

Site-specific mitigation measures, including Best Management Practices (BMPs), associated with emission sources are listed in Table 4-1.

Contingency measures for fugitive dust have been identified in the event that mitigation measures are not effective and are included in the Trigger Response Plan. Contingency measures address the following requirements:

- M-246 Condition C.10(iv): *Contingency plans to address circumstances where prescribed dust control measures are ineffective or inoperable for any reason; and*
- PA-110650 Condition 4.3.4(d): *Contingency measures to be implemented if primary mitigation measures are ineffective or no longer suitable.*

4.1 Air Episode Management Plan for Open Burning

To address PA-110650 Condition 4.2.4(d): *Air Episode Management Plan for open burning, that includes triggers for episode management and corresponding response actions.* Table 4.1-1 presents triggers and actions. The air episode will be deemed to have ceased once trigger conditions no longer exist.

Table 4-1: Site-Specific Best Management Practices and Mitigation Measures

Source	Best Management Practices (BMPs) ^a	Mitigation Measures ^b
Unpaved Roads	- Speed limits will be established based on road design class, with the maximum speed limit of 50 km/h on all Mine roads. Speed limits are clearly marked through signage and enforced by site security. All Mine personnel are expected to adhere to speed limits at all times. - Area Superintendents (or delegates) are expected to complete visual observations of dust (to monitor the effectiveness of BMPs and inform the implementation of mitigation measures) under the following conditions: - The ground is not snow covered; - Wind speed is greater than 11 m/s; - Daytime high temperatures are greater than 20°C; and - Less than 0.25 mm of precipitation in the preceding 24 hours. - Area Superintendents (or delegates) will direct grader maintenance with road crush, as needed. - Regular compaction is achieved on unpaved roads with regular use by mine traffic. - Area Superintendents (or delegates) will direct maintenance using coarse aggregate on roads with low silt content to reduce silt loading, as needed.	- Watering of unpaved roads will be directed by Area Superintendents (or delegates) based on dust visual monitoring under the following conditions: - When roads are not subject to freezing conditions creating safety concerns; and - Where dust suppressant (e.g., calcium chloride) application has not occurred. - The frequency of water truck utilization is dependent on a number of factors. Generally, road watering occurs on a continuous basis if the two conditions above are satisfied, and one or more of the following conditions is met: - The ground is not snow covered; - Wind speed is greater than 11 m/s; - Daytime high temperatures are greater than 20°C; - Less than 0.25 mm of precipitation in the preceding 24 hours; and - When visual dust observations indicate minor and localized plume size is exceeded (e.g., dust plumes exceed 2 m in height). - Area Superintendents (or delegates) will direct dust suppressant (i.e., calcium chloride) application after spring melt, as approved by the Mine Manager. The timing of application will be based on regional weather conditions and would generally occur in June. - Reduce speeds on the mine roads of high traffic if weather conditions cause fugitive dust emissions and dust cannot be controlled by alternative mitigations. Reduced speeds implemented will be dependent on real-time site conditions and directed by Area Superintendents (or delegates) to the extent practicable to mitigate fugitive dust.
Surface Earthworks	- Surface disturbance is limited to areas required based on project needs and/or construction schedule. - Area Superintendents (or delegates) are expected to complete visual observations of dust (to monitor the effectiveness of BMPs and inform the implementation of mitigation measures) under the following conditions: - The ground is not snow covered; - Wind speed is greater than 11 m/s; - Daytime high temperatures are greater than 20°C; and - Less than 0.25 mm of precipitation in the preceding 24 hours.	- Application of water will be directed by Area Superintendents (or delegates) based on dust visual monitoring under the following conditions: - When temperatures are greater than 0°C; and - Where dust suppressant (e.g., calcium chloride) application has not occurred.
Production Drilling	n/a	Personnel involved in drilling use water misters during drilling activities in very dry conditions (e.g., less than 0.25 mm/day of precipitation in the previous week).
Production Blasting	n/a	n/a
Material Handling and Transfer Locations	n/a	When material is subject to dust generating conditions (e.g., wind gusts), minimize drop height from shovels to haul trucks.
Transient Stockpiles (e.g., Associated with Surface Earthworks, Borrow Areas, etc.)	n/a	Mobile crushing units will be equipped with spray bars. Spray bars will be used as required, and only when temperatures are greater than 0°C.

Source	Best Management Practices (BMPs) ^a	Mitigation Measures ^b
Concrete Batch Plant	n/a	- When material is subject to dust generating conditions (e.g., wind gusts and low moisture material), minimize drop height. - Utilize water trucks as required.
LGO	n/a	Utilize water trucks as required.
Topsoil Stockpiles	Seed stockpiles once they have met design capacity are sloped to final grade and at an appropriate time of year for seeding to reduce erosion risk	When material is subject to dust generating conditions (e.g., wind gusts and low moisture material), minimize drop height from excavators to haul trucks.
Plant Site	- Emission control and dust suppression systems will be operated and maintained in accordance with the manufacturer's specifications. - BW Gold will comply with the manufacturers recommended schedule for inspecting and maintaining control equipment.	n/a
Primary Crusher Dust Collector	The Authorized Works associated with this discharge are a baghouse dust collector including blowers, ducting, stack, and related appurtenances.	Misting/Atomizing nozzles for the Primary Crusher dust pocket. During periods of air temperatures below 0°C, reagents can be used to limit the formation of frost balls.
Conveyors	The Authorized Works associated with this discharge (i.e., fugitive dust) are spray bars, conveyor covers, sprinkler systems, and related appurtenances.	
Screening Equipment Dust Collectors	The Authorized Works associated with this discharge are a baghouse dust collector including fans, ducting, stack, and related appurtenances.	
Secondary and Tertiary Crushers Dust Collector	The Authorized Works associated with this discharge are a baghouse dust collector including blowers, ducting, stack, and related appurtenances.	
Crushed Ore Stockpile	The Authorized Works associated with this discharge (i.e., fugitive dust) are spray bars, conveyor covers, sprinkler systems, and related appurtenances.	
Lime Silo Dust Collector	The Authorized Works associated with this discharge are a cartridge style dust collector, ducting, stack, and related appurtenances.	
Lime Silo Wet Scrubber	The Authorized Works associated with this discharge are a wet scrubber, ducting, and related appurtenances.	
Cyanide Prep Area	The Authorized Works associated with this discharge are a stack and related appurtenances.	
Copper Sulphate Mix Tank	The Authorized Works associated with this discharge are a stack and related appurtenances.	
Fire Assay Sample Prep Dust Collector	The Authorized Works associated with this discharge are a dust collector with HEPA (high efficiency particulate air) filters, ducting, stack, and related appurtenances.	
Fire Assay Lab Dust Collector / Furnace Exhaust	The Authorized Works associated with this discharge are two furnaces, a dust collector, a scrubber, ducting, stack, and related appurtenances.	
Reclaim Tunnel	The Authorized Works associated with this discharge (i.e., fugitive dust) are conveyor covers.	
Incinerator	Best Management Practices will be available when an incinerator is selected for the project.	Mitigation will be available when an incinerator is selected for the project.
Open Burn Pit(s)	- Avoid mixing soil into burn material to the extent practicable (e.g., store waste to reduce contact with soil and allow wet soil to dry from roots/logs before burning). - Periodically push material at the edge of the burn into the centre of the burn to promote rapid combustion to reduce smoke emission generation.	Follow the Air Episode Management Plan for Open Burning (see Section 5.1).

Source	Best Management Practices (BMPs) ^a	Mitigation Measures ^b
Vehicles	• Maintain equipment in good working condition according to manufacturer’s recommendations. • Reducing idling (no-idling policy will be implemented, except for situations such as extenuating circumstances during the winter where cold starts and stopping could wear on mining equipment or the vehicle is being used as refuge for lunch or breaks on hot summer days). • Use Tier IV engines for mine haul truck fleet. • Manage vehicle and equipment emissions by conducting regular vehicle, machinery and equipment maintenance, and inspections.	• Reduce idling (no-idling policy will be implemented, except for situations such as extenuating circumstances during the winter where cold starts and stopping could wear on mining equipment or the vehicle is being used as refuge for lunch or breaks on hot summer days).
Loads in Transit in Open Beds	• Install removable tarps to cover truck loads of fine material if possible. • Use tackifiers, if necessary, to limit fugitive dust from loads of fine material.	n/a

Notes:
n/a = not applicable
^a Best Management Practices (BMPs) include routine practices and engineering controls that are regularly implemented onsite to prevent dust generation under normal operating conditions.
^b Mitigation measures include practices that can be readily implemented in the event that BMPs are insufficient to adequately reduce dust generation.

Table 4.1-1: Triggers for Open Burning Air Episode Management and Corresponding Response Actions

Triggers	Response
An inversion forms trapping smoke near the ground surface.	• Wood Waste and Associated Products are not added to the burn pile and burning residue is extinguished in order to stop the generation and release of smoke as soon as is practical.
Local winds make the dispersion of the smoke inadequate (e.g., low ventilation index and/or low wind of under 2 m/s).	• Wood Waste and Associated Products are not added to the burn pile and burning residue is extinguished in order to stop the generation and release of smoke as soon as is practical.
A smoke advisory due to wildfire is issued.	• Wood Waste and Associated Products are not added to the burn pile and burning residue is extinguished in order to stop the generation and release of smoke as soon as is practical.
Smoke migrates towards offsite, wildlife habitats, water bodies, camp accommodation or buildings where works are present (suggest adding a couple of the closest sensitive receptors (e.g., camp accommodation approximately 3.5 km southeast of the designated open burn location).	• Wood Waste and Associated Products are not added to the burn pile and burning residue is extinguished in order to stop the generation and release of smoke as soon as is practical. • Immediate cessation of burning during adverse conditions until conditions improve.
Complaints due to open burning activities.	• Wood Waste and Associated Products are not added to the burn pile and burning residue is extinguished in order to stop the generation and release of smoke as soon as is practical. • Immediate cessation of burning during adverse conditions until conditions improve.
Extreme high wind speed with potential of fire hazard (e.g., 8.5 m/s).	• Reduce non-essential burning and monitoring wind speed. Keep burn piles smaller and easier to extinguish if sudden increase in wind speed occurs. • Postpone all non-essential burning until conditions improve.

5.0 Adaptive Management

Adaptive management is a Plan–Do–Monitor–Adjust cycle that uses monitoring data to refine mitigation measures and ensure environmental performance improves over time.

- Based on predicted effects, define mitigation measures and monitoring programs.
- Implement mitigation and management actions and collect data to assess their effectiveness.
- Review data, determine mitigation effectiveness and modify existing measures or implement new mitigation, as applicable. Adjustments to monitoring programs may also be identified.

Therefore, the AQFDMP is a living document that will evolve over time.

5.1 Monitoring

The ambient air monitoring program consists of the four main components listed below, which are described in the following subsections:

- Meteorological;
- Visual Monitoring (Fugitive Dust);
- Ambient Air Quality (Particulate matter (PM₁₀, and PM_{2.5}), SO₂, NO₂, CO); and
- Point Source Monitoring (total particulate matter (TPM)).

5.1.1 Meteorological Stations

A meteorological monitoring program has been established to satisfy all applicable conditions in the Mine's PA-110650 Permit.

The Mine maintains two 10-m meteorological stations referred to as the Blackwater Low, and Blackwater High, with wind roses from the stations shown, in Figure 3.2-1 and Figure 3.2-2, respectively. Equipment to measure the parameters listed below will be used. Equipment make and model are provided but these may updated with equipment with the capacity/capability to meeting conditions in the PA-110650 permit.

- **Air Temperature:** The Campbell Scientific CR1000 datalogger provides centralized acquisition, processing, and storage of analog and digital signals.
- **Relative Humidity:** The Vaisala HUMICAP HMP155 measures relative humidity.
- **Precipitation:** The OTT Pluvio2 is a weighing precipitation gauge that determines cumulative precipitation and intensity.
- **Wind Speed and Direction:** The RM Young 05103AP-10 measures wind speed via a helicoid propeller and wind direction via a precision vane.
- **Barometric Pressure:** The Vaisala BAROCAP PTB110 barometer uses a capacitive silicon BAROCAP sensor to measure absolute atmospheric pressure.
- **Snow Depth:** The Campbell Scientific SR50A determines snow depth.
- **Net Radiation:** The Kipp & Zonen NR-LITE2 measures net radiation.
- **Solar Radiation:** The Kipp & Zonen SP-LITE2 Pyranometer measures global solar irradiance.

Meteorological and Particulate Matter (PM) data are often used together to interpret the causes of higher fugitive dust levels. A Qualified Professional determined the locations of the meteorological stations and reviewed them against CSA R101:22 Class 2 station siting and instrumentation standards. Table 5.1-1 provides information on the locations, parameters measured, and the available period of data.

Table 5.1-1: Blackwater Mine Meteorological Stations

Station Name (EMS No.)	Latitude (deg N)	Longitude (deg W)	Meteorological Parameters Monitored	Data Period Available
Low (E331132)	53.2998	124.8003	Air temperature, relative humidity, precipitation, wind speed and direction, barometric pressure, snow depth, net radiation, solar radiation	August 2011 to present
High 2 (E331133)	53.1811	124.8462	Air temperature, relative humidity, precipitation, wind speed and direction, barometric pressure, snow depth, net radiation, solar radiation	June 2026 to present
High 1 (EM40043)	53.179903	124.846585	Air temperature, relative humidity, precipitation, wind speed and direction, barometric pressure, snow depth, net radiation, solar radiation	July 2012 to June 2026

5.1.2 Visual Monitoring

Dust visual monitoring is conducted by Area Superintendents (or delegates) via the Fugitive Dust Observation Log QR Code to assess conditions and inform implementation of fugitive dust mitigation measures.

Visual monitoring of dust from fugitive dust emission sources is conducted under the following conditions:

- The ground is not snow covered;
- Wind speed is greater than 11 m/s;
- Daytime high temperatures are greater than 20°C; and
- Less than 0.25 mm of precipitation in the preceding 24 hours.

5.1.3 Ambient Particulate Matter Monitoring

An ambient particulate matter monitoring has been established to satisfy the applicable conditions in the Mine's PA-110650 Permit.

The Mine maintains a Thermo Scientific Partisol-FRM Model 2025i-D PM sampler at the location shown in (Figure 5.1-1) and described in Table 5.1-2. This is located at the Operations Mine Camp which is the closest sensitive receptor.

Table 5.1-2: Blackwater Mine Partisol Monitor Location

Latitude (deg N)	Longitude (deg W)	Location ID	Parameters Monitored (ug/m ³)	Monitoring Frequency
53.195229	124.814170	EM40042	PM _{2.5} and PM ₁₀	May 1 to October 31— Collection every third day November 1 to April 30— Collection every sixth day

Meteorological and Particulate Matter (PM) data are often used together to interpret the causes of fugitive dust. A Qualified Professional determined the locations of the meteorological stations, as discussed in section 7.7.1, as well as the location of the Partisol monitor. Assessment of the Partisol monitor location was conducted in accordance with the siting criteria outlined in Part B: Air and Air Emissions Testing of the British Columbia Field Sampling Manual (BCFSM) published by the BC Ministry of Environment and Climate Change Strategy (BC ENV 2020).

5.1.4 Ambient Nitrogen Dioxide and Sulfur Dioxide Monitoring

An ambient Nitrogen Dioxide and Sulfur Dioxide monitoring program has been established to satisfy the applicable conditions in the Mine's PA-110650 Permit well as DS Condition #6.12.

The Mine maintains Radiello samplers provided by ALS for passive monitoring of nitrogen dioxide (NO₂) and sulfur dioxide (SO₂) at the Partisol monitoring station (UTM Zone 10, 378940 m Easting and 5895516 m Northing) shown in Figure 5.1-1. Table 5.1-3 provides the location ID, parameters monitored, and frequency.

Table 5.1-3: Blackwater Mine Radiello Samplers

Location ID	Parameters Monitored	Units	Monitoring Frequency
EM40106	NO ₂ and SO ₂	ppb	Monthly

Laboratory results are reviewed for sample integrity issues and erroneous data. Field notes, chains of custody, comments from the laboratory, and professional judgement will also be considered during the review process. Invalid data will be omitted from final analyzed datasets.

FIGURE 5.1-1 AIR QUALITY MONITORING LOCATIONS AS OF JUNE 30, 2026



5.1.5 Ambient Carbon Monoxide Monitoring

An ambient carbon monoxide monitoring program has been established to satisfy the applicable conditions in the Mine's PA-110650 Permit as well as DS Condition #6.12.

The Passive CO field sampling follows a methodology like the passive SO₂ and NO₂. CO is monitored near the Partisol location, along side the passive NO₂ and SO₂ monitors. The CO samples are deployed for a two-week period and then swapped out with new samples. Passive CO concentrations are monitored continuously throughout the year. Collected samples are sent to Passam Ag, an accredited laboratory with the Swiss Confederation. Table 5.1-4 provides the location ID, parameters monitored, and frequency.

Table 5.1-4: Blackwater Mine Passive Samplers

Location ID	Parameters Monitored	Units	Monitoring Frequency
EM40107	CO	ug/m ³	Monthly

5.1.6 Point Source Discharge Monitoring

Point source monitoring, has been established to satisfy the applicable conditions in the Mine's PA-110650 Permit as well as (Table 5.1-5).

As described in Permit #110650, point source monitoring must be conducted by a certified stack sampler following the *British Columbia Field Sampling Manual Part B*.

Table 5.1-5: Blackwater Mine Point Sources

Source	EMS No.	Parameters
Primary Crusher Dust Collector	E328676	Total particulate matter mass emission rate and flow rate
Secondary and Tertiary Crusher Dust Collector	E328677	
Screens Dust Collector (prior to Tertiary Crusher)	E328679	
Lime Silo Dust Collector	E328681	
Lime Silo Wet Scrubber	E328682	
Cyanide Prep Area Dust Collector	E328683	
Copper Sulphate Mix Tank Dust Collector	E328684	
Fire Assay Sample Prep Area Dust Collector	E328686	
Fire Assay Lab Dust Collector	E328687	
Incinerator ^a	E328685	

Note:

^a Incinerator has not been installed and therefore stack testing does not apply.

5.2 Adaptive Management Criteria

The following regulatory instruments covered in this AQFDMP require a trigger response plan (TRP):

- M-246 C.10(a)(iii)—The Permittee must ensure the Fugitive Dust Management Plan includes a TARP that addresses specific environmental and site conditions that could result in generation of dust and includes proactive reporting out procedures in the event that dust control measures are ineffective or inoperable for any reason. The Permittee must ensure that the Fugitive Dust Management Plan is reviewed annually and updated as procedures are modified to reflect site-specific considerations.
- PA-110650 4.3—Air quality trigger response plan for authorized non-point source associated with fugitive dust. A Qualified person must conduct a review every three years.

A stand-alone TRP addresses the requirements of the M-246 and PA-110650. The TRP will be reviewed annually to address requirements under M-246 and once every three years to address requirements in the PA-110650.

The remainder of Section 6.2, including subsections, addresses requirements of the EAC and DS, which require air quality monitoring and adaptive management in relation to the predictions of the Environmental Assessment, as described below.

5.2.1 Qualitative and Quantitative Criteria for Adaptive Management of Ambient Air Quality

EAC Condition 3 requires that monitoring includes the monitoring of mitigation measures or monitoring to determine the effectiveness of mitigation measures. The *Canadian Environmental Protection Act, 1999* establishes National Ambient Air Quality Objectives (NAAQOs) which transitioned in 2013 to the Canadian Ambient Air Quality Standards (CAAQS) to protect human health and the environment. BC has established Ambient Air Quality Objectives (AAQOs) pursuant to the *Environmental Management Act*. Federal and BC air quality objectives are provided in Table 5.2-1.

Table 5.2-1: Federal and British Columbia Ambient Air Quality Objectives

Contaminant	Units	Averaging Period	Objectives/Standards	
			CAAQS ^(a,d)	British Columbia AAQO ^(b,c)
TPM	µg/m ³	24-Hour	-	120
		Annual	-	60 ^(e)
PM ₁₀	µg/m ³	24-Hour	-	50
PM _{2.5}	µg/m ³	24-Hour	27 ^(f)	25 ^(g)
		Annual	8.8 ^(h)	8 ⁽ⁱ⁾
SO ₂	ppb	1-Hour	65 ^(j)	65 ^(k)
		Annual	4.0 ^(l)	4 ^(l)

Contaminant	Units	Averaging Period	Objectives/Standards	
			CAAQS ^(a,d)	British Columbia AAQO ^(b,c)
NO ₂	ppb	1-Hour	42 ^(m)	60 ⁽ⁿ⁾
		Annual	12.0 ^(o)	17 ^(p)
CO	ppb	1-Hour	-	13,000
		8-Hour	-	5,000

Sources:

^(a) CCME (2025).

^(b) BC ENV (2026).

Notes:

“-” signifies that no air quality objective is available.

^(c) *BC Ambient Air Quality Objectives.*

^(d) *Canadian Ambient Air Quality Standards.*

^(e) *Based on geometric mean.*

^(f) *Achievement based on the 3-year average of the annual 98th percentile of the daily 24-hour average concentrations.*

^(g) *Achievement based on annual 98th percentile of daily average, over one year.*

^(h) *Achievement based on the 3-year average of the annual average of the daily 24-hour average concentrations.*

⁽ⁱ⁾ *Achievement based on annual average, over one year. There is also a planning goal of 6 µg/m³.*

^(j) *Achievement based on the 3-year average of the annual 99th percentile of the daily maximum 1-hour average concentrations.*

^(k) *Achievement based on annual 99th percentile of D1HM, averaged over three consecutive years.*

^(l) *Achievement based on the average over a single calendar year of all 1-hour average concentrations.*

^(m) *Achievement based on the 3-year average of the annual 98th percentile of the daily maximum 1-hour average concentrations.*

⁽ⁿ⁾ *Achievement based on the annual 98th percentile of D1HM, averaged over three consecutive years.*

^(o) *Achievement based on the annual average over a single calendar year of all 1-hour average concentrations.*

^(p) *Achievement based on the annual average of 1-hour average concentrations, over one year.*

To determine if altered and/or new mitigation measures are required, on an annual basis, a Qualified Professional will compare the results of the monitoring program (Sections 5.1.3, 5.1.4, 5.1.5) to the relevant air quality objectives shown in Table 5.1-1, and historical results if there is an indication of trend of increase in concentrations. The QP will report the findings, as described in Section 5.3.2. If the QP recommends altered and/or new mitigation measures that cannot be implemented within 3 months from submission of the report to the EAO or otherwise stated by QP then a written report will be submitted to the EAO describing the process for and timing for the altered and/or new mitigation measures.

To detect when a numeric trigger has occurred, refer to Section 5.1.3 Ambient Particulate Matter Monitoring, 6.1.4 Ambient Nitrogen Dioxide and Sulfur Dioxide Monitoring, 5.1.5 Ambient Carbon Monoxide Monitoring and Table 5.2-1.

- DS Condition 6.12 requires a Follow-up Program (FUP) to compare results of the air quality monitoring program (NO₂, SO₂, PM_{2.5}, PM₁₀, dust, and CO) with predictions made in the Environmental Assessment and determine the effectiveness of mitigation measures.

- DS 2.5.4 and 2.5.5—Level of changes in concentrations [NO₂, SO₂, PM_{2.5}, PM₁₀, dust (as measured by PM_{2.5} and PM₁₀), and CO] relative to baseline that requires modified or additional mitigation, including technically and economically feasible mitigation.
 - To determine if modified or additional mitigation measures are required, on an annual basis, a Qualified Professional will compare the results of the monitoring program (Sections 5.1.3, 5.1.4, and 5.1.5) to the predicted concentrations of criteria air contaminants shown in Table 5.1-1. The QP will report the findings annually, as described in Section 5.3.2.
 - Potential modified or additional mitigation will be considered by a Qualified Professional, as required, when comparing the results of the monitoring program to the predicted concentrations of criteria air contaminants. BWG will work with the QP to determine mitigation based on the nature, scale, and potential environmental impacts. The planning of mitigation measures for upset conditions is inherently less straightforward than for predicted conditions and therefore requires a degree of flexibility.

5.2.2 Qualitative and Quantitative Criteria for Adaptive Management of Human Health Effects

Air is one input in a broad assessment human health risk assessment (HHRA), and as required by EAC Condition 20f, this section identifies the air quality criteria air contaminants (CACs) that were inputs to the HHRA contaminants of potential concern (COPC) and corresponding criteria that would cause the Holder to take corrective action.

A list of COPC (referred to as Pollutant of Concerns [POCs] in the HHRA) was identified in HHRA (Entia 2021). A screening was conducted in the HHRA to define COPC for the assessment. Predicted concentrations of NO₂, SO₂, PM_{2.5}, PM₁₀, and CO are compared to the relevant AAQOs, and the predicted concentrations are lower than the relevant AAQOs. As a result, there was no COPC through air exposure that was screened into the assessment due to the low predicted concentrations. Through continuation of monitoring as identified in Sections 5.1.3, 5.1.4, and 5.1.5 (NO₂, SO₂, PM_{2.5}, PM₁₀, and CO) and comparing monitoring results against Table 5.2-1, a screening level determination can be made if there are potential risks to adverse human health effects.

Metal in dust deposition through soil, surface water, groundwater and country foods were screened in as COPCs in the HHRA (Entia 2021). Monitoring of metals in dust is through CFMP program and potential human health risk through dust deposition will be considered as part of CFMP.

As a complete assessment of potential human health effects includes more than ambient air quality, this AQFDMP can only include potential criteria for quantitative and qualitative criteria related to air quality. If the monitoring results show exceedance over the relevant AAQOs, BW Gold will review the cause of the exceedance and determine if the exceedance is related to Mine operations, or other contributing factors. BW Gold will review CFMP monitoring results along with air quality results if AAQOs are exceeded. If risks to adverse human health effects are identified during the review, an update to the human health risk assessment may be conducted, or additional monitoring may be suggested to review the effects.

If the exceedances are due to a Mine upset related to accidents and malfunctions, an Accidents and Malfunctions Administration and Communication Plan (AMCP) will be used for notification, reporting and communication with regulators, Indigenous Groups, and the public.

5.3 Reporting

5.3.1 Event Reporting

Section 6.3.1 address EAC Condition 20 h) *how the Holder will notify the EAO, ENV, EMPR, NHA, Aboriginal Groups, IEM, and the public in the event that contaminant concentration triggers identified in paragraph f) are exceeded. The notification must include both a technical report and a plain language summary of the technical report.*

In the event that concentrations of NO₂, SO₂, PM_{2.5}, PM₁₀, dust (as measured by PM_{2.5} and PM₁₀), and CO triggers identified in Table 5.2-1 are exceeded, BW Gold will review the results to identify the contributing factors (from Mine operation or other activities in the area). If the exceedances are from Mine operations, BW Gold will review the monitoring results alongside with CFMP monitoring results. If it is confirmed that there is adverse human health effects, BW Gold will notify EAO, ENV, EMPR, NHA, Aboriginal Groups, IEM, and the public.

If the exceedances are due to a Mine upset related to accidents and malfunctions, an Accidents and Malfunctions Administration and Communication Plan (AMCP) will be used for notification, reporting and communication with regulators, Indigenous Groups, and the public.

5.3.2 Annual Reporting

BW Gold will comply with the annual reporting requirements under the FDS, EAC, M-246 and PA-110650 as they apply to this AQFDMP. Information related to the AQFDMP will be part of the annual reports listed below:

- The annual report under PA-110650, which will fulfil the conditions related to the AQFDMP Review Report;
- The annual report required under M-246, which will include documentation of the annual review and any recommended changes or updates; and
- EAC Condition 5 self-assessment report, and the DS annual report (per condition 2.11.1), which will include a summary of activities undertaken to fulfill the applicable conditions in the reporting year.

5.3.3 Record Keeping

The Environment department will be responsible for ensuring dust events are logged, including details of the onsite activities, meteorological conditions, and the management actions taken. The Environment department will also be responsible for ensuring that analysis and mitigation for any fine PM event is completed in a timely manner. Records will be maintained for:

- Public comment
- Meteorological stations
- Dust visual observations
- Particulate matter monitoring
- NO₂, SO₂, and CO monitoring
- Burn log

Monitoring data will be entered into an electronic database and, if applicable, have quality control checks completed upon receipt of results. Data will be entered in standard format that allows for data reporting and analyses. Data and data comparisons will be stored in a single file format for each type of survey or monitoring activity.

5.4 Plan Revision

The AQFDMP is a living document to which periodic updates are expected. As per Section 2.5 Engagement and Consultation, the AQFDMP was developed in consultation with EMPR (Now MCM), NHA, ENV, and Aboriginal / Indigenous Groups and was approved for implementation by the EAO on February 18. Therefore, consultation on the **revisions** to the approved plan will be conducted with the following parties:

- EMPR (Now MCM)
- NHA
- ENV
- Aboriginal/Indigenous Groups

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

6.0 Qualified Professionals

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

A handwritten signature in blue ink that reads "Tina Liu". The signature is fluid and cursive, with the first name "Tina" and last name "Liu" clearly distinguishable.

Tina Liu, MASc, PEng (EGBC)

Principal Technical Consultant

ERM Permit to Practice No.: 1001271

BC ENV Conflict of Interest and Declaration of Competency Forms are provided in Appendix D.

7.0 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 (as amended).

Environmental Assessment Act, SBC 2018, c 51.

Environmental Management Act, SBC 2003, c 53 (as amended).

Mines Act, RSBC 1996, c 293 (as amended).

Secondary

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

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

Condition #	Description	Action/Location in the Plan
1.	Document Review and Implementation Where a condition of this Certificate requires the Holder to provide a plan, program or other document, the Holder must provide the plan, program or other document to the EAO and Aboriginal Groups in the timeframe referenced in such condition, unless otherwise approved by the EAO. The EAO may, within 60 days of receiving a copy of such plan, program or other document, advise that: 1. the Holder may proceed to implement the plan, program or other document with or without revisions; or 2. a revised plan, program, or other document must be provided for approval of the EAO prior to a specified activity or milestone. If the EAO advises pursuant to paragraphs (a) or (b) that changes are required to a plan, program, or other document, then the Holder must follow the instructions of the EAO in that regard. If the EAO does not advise on paragraphs (a) or (b) within 60 days of the EAO receiving a plan, program, or other document, the Holder may proceed to implement the plan, program or other document. The Holder may, or the EAO may require the Holder to, revise any plan, program or other document if the Holder or the EAO determines that the implementation of the plan, program or other document is not: 1. meeting one or more objectives of the plan, program or other document set out in the relevant condition of this Certificate; 2. having the effects contemplated or intended, as set out in the plan, program or other document itself; 3. consistent with the Certificate; or 4. consistent with changes in industry best practices or technology.	Draft AQFDMP provided to Aboriginal Groups in August 2021 for review and comment.

Condition #	Description	Action/Location in the Plan
2.	Plan Development Where a condition of this Certificate requires the Holder to develop a plan, program or other document, any such plan, program or other document must, at a minimum, include the following information: a. purpose and objectives of the plan, program or other document; b. roles and responsibilities of the Holder and Employees; c. names and, if applicable, professional certifications and professional stamps/seals, of those responsible for the preparation of the plan, program, or other document; d. schedule for implementing the plan, program or other document throughout the relevant Project phases; e. means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness; f. schedules and methods for the submission of reporting to specific agencies, Aboriginal Groups and the public and the required form and content of those reports; and g. process and timing for updating and revising the plan, program or other document, including any consultation with agencies and Aboriginal Groups that would occur in connection with such updates and revisions.	Section 2.1 Section 2.3, Table 2.3-1 Signed by qualified professional Section 1 – the AQFDMP will be implemented during construction, operations and closure Section 5.1, Section 5.2 Section 5.3 Section 5.4
3.	Adaptive Management Where a condition of this Certificate requires the Holder to develop a plan, program or other document that includes monitoring, including monitoring of mitigation measures or monitoring to determine the effectiveness of the mitigation measures, the Holder must include adaptive management in that plan. The objective of the adaptive management is to address the circumstances that will require the Holder to implement alternate or additional mitigation measures to address effects of the Project if the monitoring shows that those effects: a. are not mitigated to the extent contemplated in the Application; b. are not predicted in the Application; or c. have exceeded the triggers identified in paragraph g) of this condition.	Section 5

Condition #	Description	Action/Location in the Plan
	The adaptive management in the plan must include at least the following:	
	a. the monitoring program that will be used including methods, location, frequency, timing and duration of the monitoring;	
	b. the baseline information that will be used, or collected where existing baseline information is insufficient, to support the monitoring program;	n/a (the baseline information is sufficient and monitoring data will continue to be collected over the LoM)
	c. the scope, content and frequency of reporting of the monitoring results;	Section 5.3
	d. the identification of qualitative and quantitative triggers, which, when observed through monitoring required under paragraph d), will require the Holder to alter existing, or develop new, mitigation measures to avoid, reduce, and/or remediate effects;	Section 5.2
	e. the methods that will be applied to detect when a numeric trigger, or type or level of change referred to in paragraph g), has occurred.	Section 5.2
	f. a description of the process for and timing to alter existing mitigation measures or develop new mitigation measures to reduce or avoid effects;	Section 5.2
	g. identification of the new and/or altered mitigation measures that will be applied when any of the changes identified in paragraphs a) to c) occur, or the process by which those will be established and updated over the relevant timeframe for the specific condition;	Identification of new or altered mitigation measures will be determined based on monitoring results, as described in Section 5.2
	h. the monitoring program that will be used to determine if the altered or new mitigation measures and/or remediation activities are effectively mitigating or remediating the effects and or avoiding potential effects; and	Monitoring results will be used to determine if mitigation measures are effective or need to be modified, as described in Section 5.2. The monitoring program is described in Section 5.1.
	i. the scope, content and frequency of reporting on the implementation of altered or new mitigation measures.	Section 5.3

Condition #	Description	Action/Location in the Plan
	If there are any requirements or mitigation measures required in the plan, program or other document for which adaptive management, or elements of adaptive management listed in paragraphs d) to l) are assessed to be not appropriate or applicable, the plan must include identification of those requirements and measures, and the rationale for that assessment.	Described in Section 5.2. This will be assessed in future plan updates when required.
4.	Consultation Where a condition of this Certificate requires the Holder consult a particular party or parties regarding the content of a plan, program or other document, the Holder must, to the satisfaction of the EAO: 1. provide written notice to each such party that: i) includes a copy of the plan, program or other document; ii) invites the party to provide its views on the content of such plan, program or other document; and iii) indicates: 1.1 if a timeframe for providing such views to the Holder is specified in the relevant condition of this Certificate, that the party may provide such views to the Holder within such time frame; or 1.2 if a timeframe for providing such views to the Holder is not specified in the relevant condition of this Certificate, specifies a reasonable period during which the party may submit such views to the Holder; 2. undertake a full and impartial consideration of any views and other information provided by a party in accordance with the timelines specified in a notice given pursuant to paragraph (a);	Draft AQFDMP provided to Aboriginal Groups in August 2021 for review and comment. While BW Gold sets general timeframes for review and comments via written notice, BW Gold and Aboriginal Groups engage in ongoing communication to establish flexible timeframes agreed to by all parties. Comments from Aboriginal Groups and corresponding BW Gold responses are maintained in a tracking table. BW Gold comprehensively and impartially reviews received comments received within agreed upon timeframes on a regular basis.

Condition #	Description	Action/Location in the Plan
	3. provide a written explanation to each such party that provided comments in accordance with a notice given pursuant to paragraph (a) as to: 3.1 how the views and information provided by such party to the Holder have been considered and addressed in a revised version of the plan, program or other document; or 3.2 why such views and information have not been addressed in a revised version of the plan, program or other document;	Responses BW Gold provides in the tracking table include explanations on how comments from Aboriginal Groups have been addressed in a revised version of the AQMP. In cases where such comments have not been addressed in the revised version, BW Gold similarly explains its rationale for doing so.
	4. maintain a record of consultation with each such party regarding the plan, program or other document; and	BW Gold is maintaining consultation records
	5. provide a copy of such consultation record to the EAO, the relevant party, or both, promptly upon the written request of the EAO or such party. The copy of such consultation record must be provided to the EAO, relevant party, or both, no later than 15 days after the Holder receives the request for a copy of the consultation record, unless otherwise authorized by the EAO.	Potential future requirement.
20.	The Holder must retain a Qualified Professional to develop an Air Quality and Dust Management Plan. The plan must be developed in consultation with ENV, EMPR, NHA and Aboriginal Groups. The plan must include at least the following: a. the means by which the mitigation measures identified in the Mitigations Table required under Condition 43 for the valued component Air Quality will be implemented; b. the means by which guidance contained in EMPR's and ENV's guidance: Developing a Fugitive Dust Management Plan for Industrial Projects (May 2018, or as updated or replaced from time to time) is addressed; c. the identification and detailed descriptions of dust-emitting sources from the Project; d. the identification of environmental receptors to be monitored; e. a compliance monitoring program, including the locations of monitoring stations and equipment that will be used to conduct the monitoring;	Section 6 Appendix C Section 3 Section 5.1 Section 5.1

Condition #	Description	Action/Location in the Plan
	f. the contaminants of potential concern (COPC) and corresponding concentrations (triggers) that would cause the Holder to take corrective action to reduce contaminant concentrations to avoid adverse health effects to receptors identified in paragraph d);	Section 5.2.2
	g. how this plan will inform the Wildlife Management and Monitoring Plan (Condition 23), and Country Foods Monitoring Plan (Condition 41); and	Section 2.4
	h. how the Holder will notify the EAO, ENV, EMPR, NHA, Aboriginal Groups, IEM, and the public in the event that contaminant concentration triggers identified in paragraph f) are exceeded. The notification must include both a technical report and a plain language summary of the technical report.	Section 5.3
	The Holder must provide the draft plan that was developed in consultation with ENV, EMPR, NHA, and Aboriginal Groups to ENV, EMPR, NHA, Aboriginal Groups and the EAO for review a minimum of 60 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.	To be submitted 60 days prior to planned commencement.
	The plan and any amendments thereto, must be implemented to the satisfaction of a Qualified Professional throughout Construction, Operations, and Closure and to the satisfaction of the EAO.	Future requirement.

Appendix B Concordance with Canadian Environmental Assessment Agency Decision Statement (April 2019)

Appendix B Concordance with Canadian Environmental Assessment Agency Decision Statement (April 2019)

Condition #	Description	Location in Plan
2.1 (General Conditions)	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action (including community and Indigenous traditional knowledge), are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.	Section 1;; Section 5; Section 6
2.2 (General Conditions)	The Proponent shall, when mitigation is a requirement of a condition set out in this Decision Statement, give preference to avoiding the adverse environmental effect of the Designated Project over minimizing the adverse environmental effect of the Designated Project. If unable to avoid the adverse environmental effect, the Proponent shall give preference to minimizing the adverse environmental effect of the Designated Project over compensating for the adverse environmental effect of the Designated Project. If unable to minimize the adverse environmental effect, the Proponent shall compensate for the adverse environmental effect of the Designated Project.	Section 4; Section 5
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; 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; 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; 2.3.4 strive to reach consensus with Indigenous groups; and 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.	In Progress; Section 5.4

Condition #	Description	Location in Plan
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; 2.4.2 the type of information and the period of time to be provided when seeking input; 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 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.	In Progress
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: 2.5.4 the level 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.	Section 5.2

Condition #	Description	Location in Plan
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; 2.11.2 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; 2.11.4 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.	Section 5.3
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 5.3
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.	Section 5.3
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.	In Progress
6.1	The Proponent shall mitigate, during all phases of the Designated Project, emissions of fugitive dust from the Designated Project, including dust associated with vehicles on project roads.	Section 4 1

Condition #	Description	Location in Plan
6.3	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a protocol for receiving complaints related to the exposure to noise and dust from the Designated Project. The Proponent shall respond to any noise or dust complaint(s) within 48 hours of the complaint being received and shall implement corrective actions to reduce exposure to noise or dust in a timely manner. The Proponent shall implement the protocol during construction, operation and decommissioning.	Section 2.5
6.12	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 health of Indigenous Peoples as a result of changes to air quality and determine the effectiveness of mitigation measures. As part of the implementation of the follow-up program, the Proponent shall monitor nitrogen dioxide (NO ₂), sulfur dioxide (SO ₂), fine particulate matter (PM _{2.5}), particulate matter (PM ₁₀), dust, and carbon monoxide (CO) in air. The Proponent shall implement the follow-up program during all phases of the Designated Project and shall apply conditions 2.9 and 2.10 when implementing the follow-up program.	Section 5.2
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 5.2

Appendix C Concordance Table with Developing a Fugitive Dust Management Plan for Mines in BC (BC EMLI and ENV 2023)

Appendix C Concordance Table with Developing a Fugitive Dust Management Plan for Mines in BC (BC EMLI and ENV 2023)

Section	Description	Location in the Plan
1. Introduction	This section provides contextual background information on the project, project overview, and regulatory framework.	Section 1
1.1 Proponent Information	Provide an overview including the name, organization and structure of the operating company.	Section 1.3
1.2 Permitting	Identify the permit for which this document is being developed and other relevant licences, authorizations and regulations which impact on this document.	Section 1.5
1.3 Purpose, Objectives and Scope	Describe the purpose and/or objectives that this plan will address.	Section 2.1
1.4 Authorship and Submission Record	A record of the development and submission of the plan should be included.	Work Instructions
2. Facility Description and Setting [<i>general overview</i>] and 2.1 Site Ownership and Physical Location	Provide information on the site ownership, all relevant tenures/permit boundaries, and the project location in relation to local communities and other sensitive receptors.	Section 1
2.2 Descriptive Overview of the Facility	Provide a brief overview of the site and activities that could result in fugitive dust.	Section 3
2.3 Process Flow Diagram or Description of the Facility	Provide a process flow diagram and/or use descriptions to indicate the process, operations and equipment that have the potential to emit fugitive dust.	Section 3
3. Facility Description and Setting [<i>for dust</i>]	List and characterize potential sources and/or activities which may generate fugitive dust. This includes climatic conditions which cause dust.	Section 3
3.1 Source List Review	The FDMP must include a procedure to ensure the source list is reviewed on a regular schedule to reflect current conditions.	Section 5.4

Section	Description	Location in the Plan
3.2 Source List Update Procedure	Outline the procedure to take when updating or removing existing sources or adding new sources to the list.	Section 5.4
3.3 Fugitive Dust Source List	The fugitive dust source list must include the following: • unique identification number or designation for each source; • location of the source within the facility (or reference ID on the included site map); • potential source of fugitive dust; • factors influencing generation of dust (e.g., wind, operational activities); and • identification of the dust-generating material (e.g., aggregate, clean coal, road dust).	Section 3
4. Identification of Potential Effects of Fugitive Dust	The potential effects of dust both on and off the site should be identified, including risk assessment.	Section 5.2
5. Fugitive Dust Management	The FDMP must contain a description of how fugitive dust will be managed onsite.	Section 4
5.1 Site Specific Mitigation Measures	The FDMP is most effective when it is developed to be a site-specific, operational plan. In order to achieve this objective, site specific mitigation measures (including best management practices) must be prescribed to address activities that have been identified.	Section 4
5.2 Site Maps	The site map will clearly identify the locations of all fugitive dust emission sources and site features discussed in the facility description.	Figure 3.3-1
6. Plan Implementation	This section should include descriptions of how the site-specific mitigation measures will be implemented, a procedure that describes how implementation of the plan is monitored and assessed, details of personnel responsible for monitoring relevant scheduling of activities, trigger action response planning, and record keeping.	Section 2, Section 4 and Section 5
6.1 Roles and Responsibilities	Describe the roles and responsibilities for implementation of, and compliance with, the plan. The plan must clearly identify all site personnel roles and responsibilities including contractors and Qualified Professionals.	Section 2.3
6.2 Training	The plan should identify training and frequency of training of site personnel identified in the 'Roles and Responsibilities' section to ensure that they are aware of their responsibilities under the plan.	Section 2.4.1

Section	Description	Location in the Plan
6.3 Monitoring and Maintenance	Monitoring activities may include tracking of public complaints, visual inspection of facilities by site personnel, and quantitative monitoring of the environment, such as passive particulate deposition (dustfall) or active suspended particulate (TSP, PM ₁₀ or PM _{2.5}) sampling on and off site, to evaluate the effectiveness of dust control practices and to quantify levels of fugitive dust and its composition leaving the site.	Section 2.5.1 and Section 5.1
6.4 Monitoring and Maintenance [sic] <i>Note that there is an error in the source document and the Section heading based on the previous version of the guidance document should be:</i> Trigger Action Response Plan (TARP)	Provide a response plan including specific triggers, actions to be taken, and reporting protocols. The trigger action response plan (TARP) should include: • identify the frequency of visual, qualitative, and quantitative monitoring, the monitoring methods to be used, and where monitoring will occur; • identify how and by whom it is determined that a response is necessary; • identify specific measurable and reportable triggers linked to a response/ implementation of the mitigation measures identified in Section 6; and, • identify what information/condition/situation prompts maintenance of current mitigation strategies, when it is considered “appropriate” to use alternative means of mitigation and what forms of alternative mitigation strategies will be used.	Section 5
6.5 Schedule	Provide a schedule identifying commitments such as training, implementation of site-specific mitigation measures, monitoring, inspections, and reporting will be conducted.	Section 5
6.6 Record Keeping	Include information on record keeping, including a complaint tracking tool and a record of dust events and responses.	Section 5.3
7. Adaptive Management	The management plan is a living document that should be reviewed as site conditions change and following evaluation of monitoring and sampling data. An adaptive management approach should be used to evaluate the effectiveness and direct continual improvement of the plan. This section should include a commitment to have a QP regularly (at least annually) review the fugitive dust management methods being employed on site and to assess whether they are being undertaken in accordance with the most recent management plan.	Section 5

Section	Description	Location in the Plan
9. Reporting	Outline the structure and timing of reporting, taking into account the annual reporting requirements of regulatory agencies, updates to indigenous groups and the public, and reporting related to the TARP. Describe the reporting process, who will complete the reporting, how often, what will be included in the report, and who the reports will be submitted to. Annual Reports should include information pertaining to: • confirmation that the FDMP is being implemented as written; • the monitoring results; • the effectiveness of mitigation measures; • the number of dusting events that occurred; • any complaints received and the actions taken to address complaints and; • any deficiencies identified in the FDMP and corrective actions taken. Reports are to be prepared and signed by a Qualified Professional(s).	Section 5.3

Appendix D BC ENV Conflict of Interest and Declaration of Competency Forms

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 Tina Liu Print First and Last Name, as a member of EGBC 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 Mine Air Quality and Fugitive Dust 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 Insert Ministry Contact Name, erring on the side of caution.

☐ 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: Tina Liu _____

Date: 06-30-2026 _____

Witnessed by: 
X _____

Print name: Kimberly San _____

¹Qualified 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.

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 professionals¹, 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 Tina Liu
Title Principal Technical Consultant
2. Are you a registered member of a professional association in B.C.? ☒ Yes ☐ No
Name of Association: EGBC Registration # 164928
3. Brief description of professional services:
Review of client updated Air Quality and Fugitive Dust 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: Tina Liu

Witnessed by:

X 

Print Name: Kimberly San

Date signed: 06/30/2026

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