



## Blackwater Gold Project

### Aboriginal Group Monitor and Monitoring Plan (General)

December 2021

*Aboriginal Group Monitor and Monitoring Plans have been developed for LDN and UFN, CSFNs, and NFN. Common elements are included in this document.*

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## ACRONYMS AND ABBREVIATIONS

|   |   |
|---|---|
| Aboriginal Groups or Indigenous nations | Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stelat'en First Nation and Nazko First Nation (as defined in the Project's Environmental Assessment Certificate M#19-01) |
| AGMMP                                   | Aboriginal Group Monitor and Monitoring Plan  |
| ACHRMP                                  | Archaeological and Cultural Heritage Resource Management Plan   |
| APEGBC                                  | Association of Professional Engineers and Geoscientists of British Columbia   |
| Artemis                                 | Artemis Gold Inc.   |
| AGMMP                                   | Aboriginal Group Monitor and Monitoring Plan  |
| BC                                      | British Columbia  |
| Blackwater or the Project               | Blackwater Gold Project   |
| BW Gold                                 | BW Gold LTD.  |
| C&E                                     | Compliance and Enforcement  |
| C&M                                     | Care and maintenance  |
| CEO                                     | Chief Executive Officer   |
| CM                                      | Construction Manager  |
| COO                                     | Chief Operating Officer   |
| CSFN                                    | Carrier Sekani First Nations  |
| DS                                      | Decision Statement  |
| EAC or Certificate                      | Environmental Assessment Certificate  |
| EAO                                     | Environmental Assessment Office   |
| EM                                      | Environmental Manager   |
| EMC                                     | Environmental Monitoring Committee  |
| EMS                                     | Environmental Management System   |
| EPCM                                    | Engineering, Procurement and Construction Management  |
| FSR                                     | Forest Service Road   |
| GM                                      | General Manager   |
| IEM                                     | Independent Environmental Monitor   |
| km                                      | kilometre   |



|          |  |
|----------|--|
| LDN      | Lhoosk'uz Dené Nation  |
| Mtpa     | million tonnes per annum                                       |
| New Gold | New Gold Inc.  |
| NFN      | Nazko First Nation   |
| NWFN     | Nadleh Whut'en First Nation                                    |
| PPE      | Personal protective equipment                                  |
| t        | tonnes   |
| SFN      | Saik'uz First Nation   |
| StFN     | Stellat'en First Nation  |
| ToE      | Terms of Engagement  |
| TSF      | Tailings Storage Facility                                      |
| UFN      | Ulkatcho First Nation  |
| UNDRIP   | United Nations Declaration on the Rights of Indigenous Peoples |
| VP       | Vice President   |
| WMMP     | Wildlife Mitigation and Monitoring Plan                        |

## 1. PROJECT OVERVIEW

The Blackwater Gold Project (the Project) is a gold and silver open pit mine located in central British Columbia (BC), approximately 112 kilometres (km) southwest of Vanderhoof, 160 km southwest of Prince George, and 446 km northeast of Vancouver, British Columbia (BC). The Project site is presently accessed via the Kluskus Forest Service Road (FSR), the Kluskus-Ootsa FSR and an exploration access road, which connects to the Kluskus-Ootsa FSR at km 142. The Kluskus FSR joins Highway 16 approximately 10 km west of Vanderhoof. A new, approximately 16 km road will be built to replace the existing exploration access road, which will be decommissioned. The new planned access is at km 124.5. Driving time from Vanderhoof to the mine site is about 2.5 hours.

Major mine components include a tailings storage facility (TSF), ore processing facilities, waste rock, overburden and soil stockpiles, borrow areas and quarries, water management infrastructure, water treatment plants, accommodation camps and ancillary facilities. The gold and silver will be recovered into a gold-silver doré product and shipped by air and/or transported by road. Electrical power will be supplied by a new approximately 135 km, 230 kilovolt (kV) overland transmission line that will connect to the BC Hydro grid at the Glenannan substation located near the Endako mine, 65 km west of Vanderhoof.

The Blackwater mine site is located within the traditional territories of Lhoosk'uz Dené Nation (LDN), Ulkatcho First Nation (UFN), Skin Tyee Nation and Tsilhqot'in Nation. The Kluskus and Kluskus-Ootsa FSRs and Project transmission line cross the traditional territories of Nadleh Whut'en First Nation (NWFN), Saik'uz First Nation (SFN), and Stellat'en First Nation (StFN; collectively, the Carrier Sekani First Nations [CSFNs]) as well as the traditional territories of the Nazko First Nation (NFN), Nee-Tahi-Buhn Band, Cheslatta Carrier Nation and Yekooche First Nation (BC EAO 2019a, 2019b).

Project construction is anticipated to take two years. Mine development will be phased with an initial milling capacity of 15,000 tonnes per day (t/d) or 5.5 million tonnes per annum (Mtpa) for the first five years of operation. After the first five years, the milling capacity will increase to 33,000 t/d (or 12 Mtpa) for the next five-years, and to 55,000 t/d (or 20 Mtpa) in Year 11 until the end of the 23 year mine life. The closure phase is 24 to approximately 45 years, subject to the Open Pit has filled and the TSF is allowed to passively discharge to Davidson Creek, and the Post-closure phase is 46+ years.

New Gold Inc. (New Gold) received Environmental Assessment Certificate #M19-01 (EAC) on June 21, 2019 under the 2002 *Environmental Assessment Act* (BC EAO 2019c) and a Decision Statement (DS) on April 15, 2019 under the *Canadian Environmental Assessment Act, 2012* (CEA Agency 2019). In August 2020, Artemis Gold Inc. (Artemis) acquired the mineral tenures, assets and rights in the Blackwater Project that were previously held by New Gold Inc. On August 7, 2020, the Certificate was transferred to BW Gold LTD. (BW Gold), a wholly-owned subsidiary of Artemis, under the 2018 *Environmental Assessment Act*. The Impact Assessment Agency of Canada notified BW Gold on September 25, 2020 to verify that written notice had been provided within 30 days of the change of proponent as required in Condition 2.16 of the DS, and that a process had been initiated to amend the DS.

## 2. PURPOSE AND OBJECTIVES

The purpose of the Aboriginal Group Monitor and Monitoring Plan (AGMMP) is to describe BW Gold's approach to identify, recruit and retain Aboriginal Monitors.

The plan objectives are to:

- Identify the scope of the Monitor's activities related to monitoring for potential effects of the Project on that Aboriginal Group's Aboriginal Interests, which include asserted or determined Aboriginal rights, including title or treaty rights.
- Provide terms of engagement (ToE) for Aboriginal Monitors that focus on the potential effects from the Project on Aboriginal Group's Aboriginal Interests.

The AGMMP applies to all Aboriginal Groups.<sup>1</sup> Separate ToE have been developed for LDN and UFN, CSFNs, and NFN, and tailored to reflect the scope of their monitoring based on potential effects of the Project on Aboriginal Interests. The ToE are appended to Aboriginal Group-specific versions of the AGMMP. The Monitors are intended to be integrated with BW Gold's environmental team and fulfill a role consistent with that of an Environmental Monitor, with additional focus on values raised by Aboriginal Groups as described in their ToE. The Monitors and the EM will work to coordinate and streamline monitoring and reporting to achieve efficiency and avoid duplicative monitoring, where practicable.

The AGMMP is required by EAC Condition 16.

### 2.1 Linkages to Other Management and Monitoring Plans

Aboriginal Monitors will participate in environmental monitoring associated with a number of management and monitoring plans, which are summarized in Appendix C. The scope of monitoring by Aboriginal Monitors will be determined in consultation with each Aboriginal Group based on the potential effects of the Project on Aboriginal Interests. Plans not captured in Appendix C but relevant to AGMMP include:

- EAC Condition 12 (Independent Environmental Monitor), which provides ToE for retaining independent environmental monitors throughout construction, operations, closure and post-closure; and
- EAC Condition 16 (Aboriginal Engagement Plan), which identifies how BW Gold will engage with each Aboriginal Group on the development and implementation of the requirements of the Certificate, and updates to Certificate plans, programs or other documents.

Additionally, there are environmental and cultural heritage resource plans related to the AGMMP as the monitors will be involved in the implementation of these plans. The relevant plans are listed in a table that is appended to the ToE that have been developed for LDN and UFN, CSFNs, and NFN.

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<sup>1</sup> Aboriginal Groups, as defined in the Project's Environmental Assessment Certificate M#19-01 include: Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stelat'en First Nation and Nazko First Nation.

### 3. ROLES AND RESPONSIBILITIES

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

Table 3-1 provides an overview of general environmental management responsibilities during all phases of the mine life for key positions that will be involved in environmental management. Other positions not specifically listed in Table 3-1 but who will provide supporting roles include independent environmental monitors, Independent Tailings Review Board, TSF qualified person, and other qualified persons and professionals. Details on the roles and responsibilities of Aboriginal Monitors will be determined during discussions on the ToE in Appendix D.

**Table 3-1: Blackwater Gold Roles and Responsibilities**

| Position  | Responsibility  |
|---|---|
| Chief Executive Officer (CEO)                           | The CEO is responsible for overall Project governance. Reports to Board.  |
| Chief Operating Officer (COO)                           | The COO is responsible for engineering and Project development and coordinates with the Mine Manager to ensure overall Project objectives are being managed. Reports to CEO.  |
| General Manager (GM) Development                        | The GM is responsible for managing project permitting, the Project's administration services and external entities, and delivering systems and programs that ensure Artemis's values are embraced and supported, Putting People First, Outstanding Corporate Citizenship, High Performance Culture and Rigorous Project Management and Financial Discipline. Reports to COO.  |
| Vice President (VP) Environment & Social Responsibility | The VP Environment & Social Responsibility is responsible for championing the Environmental Policy Statement and EMS, establishing environmental performance targets and overseeing permitting. Reports to COO.   |
| Mine Manager  | The Mine Manager, as defined in the <i>Mines Act</i> , has overall responsibility for mine operations, including the health and safety of workers and the public, Environmental Management System (EMS) implementation, overall environmental performance and protection, and permit compliance. The Mine Manager may delegate their responsibilities to qualified personnel. Reports to GM.  |
| Construction Manager (CM)                               | The CM is accountable for ensuring environmental and regulatory commitments/ and obligations are being met during the construction phase. Reports to GM.  |
| Environmental Manager (EM)                              | The EM is responsible for the day-to-day management of the Project's environmental programs and compliance with environmental permits, updating EMS and MPs. The EM or designate will be responsible for reporting non-compliance to the CM, and Engineering, Procurement and Construction Management (EPCM) contractor, other contractors, the Company and regulatory agencies, where required. Supports the CM and reports to Mine Manager. |
| Departmental Managers                                   | Departmental managers are responsible for implementation of the EMS relevant to their areas. Report to Mine Manager.  |
| Indigenous Relations Manager                            | Indigenous Relations Manager is responsible for Indigenous engagement throughout the life of mine. Also responsible for day-to-day management and communications with Indigenous groups. Reports to VP, Environment & Social Responsibility.  |



| Position                                     | Responsibility   |
|--|--|
| Community Relations Advisor                  | Community Relations Advisor is responsible for managing the Community Liaison Committee and Community Feedback Mechanism. Reports to Indigenous Relations Manager  |
| Environmental Monitors                       | Environmental Monitors (includes Environmental Specialists and Technicians) are responsible for tracking and reporting on environmental permit obligations through field-based monitoring programs. Report to EM.  |
| Aboriginal Monitors                          | Aboriginal Monitors are required by EAC #M19-01 Condition 17 and will be responsible for monitoring the Project's potential effects on Aboriginal interests. Aboriginal Monitors will be involved in adaptive management and follow-up monitoring programs. Report to EM and will also have lines of communication to the Indigenous Relations Manager and their Aboriginal Group. |
| Employees and Contractors                    | Employees are responsible for being aware of permit requirements specific to their roles and responsibilities. Report to Departmental Managers.  |
| Qualified Professionals or Qualified Persons | Qualified professionals and qualified persons will be retained to review objectives and conduct various aspects of the Project's environmental and social monitoring as specified in EMPs and social management plans.   |

BW Gold will employ a qualified person as an EM who will ensure that throughout the Construction phase the EMS requirements are established, implemented and maintained, and that environmental performance is reported to management for review and action. The EM is responsible for retaining the services of qualified persons or qualified professionals with specific scientific or engineering expertise to provide direction and management advice in their areas of specialization. The EM will be supported by Environmental Monitors that will include Environmental Specialists and Technicians and a consulting team of subject matter experts in the fields of environmental science and engineering.

During the Construction phase, the EPCM contractor and sub contractors, will report to the BW Gold CM. The EPCM contractor will be responsible for ensuring that impacts are minimized, and environmental obligations are met during the construction phase. For non-EPCM contractors, who will perform some of the minor works on site, the same reporting structure, requirements, and responsibilities will be established as outlined above. BW Gold will maintain overall responsibility for management of the construction and operation of the mine site, and will therefore be responsible for establishing employment and contract agreements, communicating environmental requirements, and conducting periodic reviews of performance against stated requirements.

The CM is accountable for ensuring that environmental and regulatory commitments/obligations are being met during the construction phase. The EM will be responsible for ensuring that construction activities are proceeding in accordance with the objectives of the EMS and associated MPs. The EM or designate will be responsible for reporting non-compliance to the CM, and EPCM contractor, other contractors, the Company and regulatory agencies, where required. The EM or designate will have the authority to stop any construction activity that is deemed to pose a risk to the environment; work will only proceed when the identified risk has been addressed and concerns rectified.

Environmental management during operation of the Project will be integrated under the direction of the EM, who will liaise closely with Departmental managers and will report directly to the Mine Manager. The EM will be supported by the VP Environment and Social Responsibility in order to provide an effective and integrated approach to environmental management and ensure adherence to corporate environmental standards. The EM will be accountable for implementing the approved MPs and reviewing them periodically for effectiveness. Departmental Managers (e.g., mining, milling, and plant/site services) will be directly responsible for implementation of the EMS and MPs and standard operating procedures

relevant to their areas. All employees and contractors are responsible for daily implementation of the practices and policies contained in the EMS.

During closure and post-closure staffing levels will be reduced to align with the level of activity associated with these phases. Prior to initiating closure activities, BW Gold will revisit environmental and health and safety roles and responsibilities to ensure the site is adequately resourced to meet permit monitoring and reporting. The Mine Manager will maintain overall responsibility for management of Closure and Post-closure activities.

Pursuant to Condition 19 of the Project's EAC #M19-01, BW Gold has established an Environmental Monitoring Committee (EMC) to facilitate information sharing and provide advice on the development and operation of the Project, and the implementation of EAC conditions, in a coordinated and collaborative manner. Committee members include representatives of the Environmental Assessment Office (EAO), UFN, LDN, NWFN, StFN, SFN, NFN, Ministry of Energy, Mines and Low Carbon Innovation, ENV and Ministry of Forests, Lands, Natural Resource Operations and Rural Development.

## 4. COMPLIANCE OBLIGATIONS, GUIDELINES, AND BEST MANAGEMENT PRACTICES

### 4.1 Legislation

Federal legislation applicable to the AGMP includes.

- *Impact Assessment Act*, and
- *United Nations Declaration on the Rights of Indigenous Peoples Act*.

Provincial legislation applicable to the AGMP includes.

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

### 4.2 Environmental Assessment Office and Federal Decision Statement Conditions

The AGMMP is required by EAC Condition 17. Condition 3 (Adaptive Management) does not apply to the AGMMP as Condition 17 does not require monitoring or the implementation of mitigation measures. A concordance table identifying where the EAC Condition 17 requirements are located in the plan is provided in Appendix A.

There are no federal DS conditions requiring Aboriginal Monitors.

### 4.3 Existing Permits

Aboriginal Monitors will be involved in monitoring during the Early Works.

### 4.4 Guidelines and Best Management Practices

There is no specific guidance related to Aboriginal Monitors or monitoring. The EAO's Compliance and Enforcement Policy and Procedures (Version 1.1; EAO 2020) describe their compliance and enforcement policy and procedures and how the EAO works with independent environmental monitors (IEMs) and Indigenous groups. It is expected that input provided by Aboriginal Groups on the AGMMP throughout its implementation will inform best practices.

## 5. CONTEXT

### 5.1 Overview of Project Interactions with Aboriginal Groups

Table 5-1 summarizes the Project components and activities that will potentially interact with the Aboriginal Groups' Traditional Territories (Appendix B) and provides the context for the potential effects of the Project on Aboriginal Interests.

**Table 5-1: Project Components and Activities and Potential Interaction with Aboriginal Group Traditional Territories**

| Project Components and Activities                                | LDN | UFN | SFN | StFN | NWFN | NFN |
|--|-----|-----|-----|------|------|-----|
| Mine site components and associated activities                   | ●   | ●   |     |      |      |     |
| Airstrip and airstrip access road                                | ●   | ●   |     |      |      |     |
| Freshwater supply system, water supply pipeline and service road | ●   |     | ●   |      |      |     |
| Tatelkuz Lake water withdrawal                                   | ●   |     | ●   |      |      |     |
| Mine discharges (air, treated effluent)                          | ●   | ●   | ●   | ●    | ●    |     |
| Component footprints causing changes to water flows              | ●   | ●   | ●   |      |      |     |
| Mine Access Road   | ●   | ●   |     |      |      |     |
| Project use of Kluskus FSR                                       | ●   |     | ●   |      | ●    | ●   |
| Project use of Kluskus-Ootsa FSR                                 | ●   | ●   | ●   |      |      | ●   |
| Transmission Line (construction and maintenance)                 | ●   | ●   | ●   | ●    | ●    |     |

### 5.2 Aboriginal Values and Monitoring Protocols

Each Aboriginal Group is responsible for providing direction to their monitor on the values of importance for monitoring. This may be done through verbal and written communications, and reviewed annually. This direction will provide the foundation for the development of an annual conceptual monitoring plan (described in the ToE in Appendix D) by the Aboriginal Monitor, which will be shared with their Aboriginal Group and BW Gold. BW Gold will utilize this understanding of Aboriginal values of importance in training and engagement with employees and contractors, and update those programs accordingly.

BW Gold's understanding of values of importance to each Aboriginal Group for monitoring is set out in the ToE (Appendix D).



## 6. IDENTIFICATION AND RETENTION OF ABORIGINAL MONITORS

### 6.1 Identifying an Aboriginal Monitor

BW Gold will work with Aboriginal Groups to identify their Aboriginal Monitor by providing a job description. The monitor must be approved by the Aboriginal Group and BW Gold, unless otherwise authorized by EAO.

Any Aboriginal Group may notify BW Gold and EAO in writing if they wish to have the same monitor as another Aboriginal Group act as their monitor, rather than each having separate monitors. In this case, the Aboriginal Group will provide, in writing, the time-period or Project phase over which the shared monitor would be in place. In this case, BW Gold will communicate and confirm with the Aboriginal Groups who are sharing a monitor regarding administrative aspects of the role.

### 6.2 Aboriginal Monitor Job Description

BW Gold will develop a job description for the Aboriginal Monitor role. The job description will be used by BW Gold for those monitors retained directly by BW Gold or those contracted through the Aboriginal Group. The job description will include, at a minimum an overview of the Project, the Aboriginal Monitor role and responsibilities and expectations for the role based on the ToE. The job description will also reflect BW Gold's policies, procedures, site access requirements and will provide information on desired experience and qualifications, hours or work, shift rotation and other information consistent with a job description. Ideally potential candidates should have experience in environmental or cultural resource protection, in accordance with the responsibilities outlined in the ToE.

The job description will also outline conditions for working at a mine that must be met in accordance with the *Mines Act*. In accordance with the Act, the Mine Manager is responsible for project activities, including site access. The Mine Manager has overall responsibility for mine operations, including the health and safety of workers and the public. The Mine Manager has the authority to assess the fitness for work of all people accessing the site, including Aboriginal Monitors, and will consider their qualifications to undertake the work, based on their knowledge, training and experience and capability of identifying any potential or actual danger to health and safety in the workplace. Fitness for work will be a requirement for site access and the Aboriginal Monitor role more generally. The Mine Manager will decide whether an Aboriginal Monitor meets the requirements of the job description and can fulfill the role.

All Aboriginal Monitors will abide by BW Gold policies while conducting monitoring activities. These requirements will be set out in the Monitor's employment agreement or contractual agreement, as appropriate.

### 6.3 Retaining Monitors

To initiate discussions on monitor retention, BW Gold will provide the job description (section 6.2) to the Aboriginal Group at least 30 days prior to commencing construction within the Aboriginal Group's Traditional Territory. The job description will be provided by email unless otherwise requested by the Aboriginal Group.

Thirty days prior to commencing construction within an Aboriginal Group's Traditional Territory, BW Gold will inquire as to whether the Aboriginal Group prefers that the Aboriginal monitor be retained by BW Gold or by the Aboriginal Group. If at any time an Aboriginal Group decides to change their preference for retaining a monitor, a minimum of 90 days notice is required to allow time for BW Gold to make other arrangements. A change of retention preference notice must be made in writing by the Aboriginal Group to BW Gold.

In the event of a termination or resignation (either of an employee or contract Aboriginal Monitor), there may be a period in which there is no Aboriginal Monitor from the applicable Aboriginal Group. In this case, BW Gold will provide the job description to the Aboriginal Group within 7 days of the termination or resignation to commence the recruiting process. Changes to the job description will be discussed with Aboriginal Groups prior to finalizing the job description.

BW Gold will not be out of compliance with the retention aspects of EAC Condition 17 provided it has followed the process set out in this plan for retaining monitors. Aboriginal Monitors will be retained through the Construction, Operations and Closure phases of the mine.

### **6.3.1 Monitors Retained by BW Gold**

For Aboriginal Monitors retained by BW Gold, BW Gold will work with each Aboriginal Group to recruit the monitor. BW Gold will provide the job description to the Aboriginal Group and ask the Aboriginal Group to identify potential monitors and to provide their CVs. BW Gold will consider the advice of the Aboriginal Group in advertising for the role.

BW Gold will be responsible for interviewing the candidates and retaining suitable monitors. BW Gold will invite an Aboriginal Group representative to participate in the interview. BW Gold will have the discretion to determine suitability of potential candidates for the role and retain final decision on hiring. If a Monitor retained by BW Gold needs to be replaced, BW Gold will work with the Aboriginal Group to identify and recruit a new monitor following the process set out above. If no suitable monitor candidates are identified by the Aboriginal Group, BW Gold will follow up with the Aboriginal Group on a monthly basis to check to see if any new candidates are available until such time as a monitor from that Aboriginal Group is found or is no longer needed, or is directed in writing otherwise by the Aboriginal Group.

Applicants for the Aboriginal Monitor position will have to pass pre-employment screening testing in order to be appointed to the position, which includes alcohol and drugs, medical and fitness testing, as well as a criminal background check. The pre-employment screening is a regular part of the BW Gold recruitment process. BW Gold intends to implement a vaccination policy. If this policy takes place prior to an Aboriginal Monitor starting, they will have to be in compliance with BW Gold's vaccination policy, as well as all other applicable policies and procedures.

### **6.3.2 Monitors Retained by Aboriginal Groups**

For Monitors retained by an Aboriginal Group, BW Gold will provide the job description to the Aboriginal Group to assist in retaining a suitable candidate. It is the responsibility of the Aboriginal Group to ensure that the monitor is available and capable of participating in monitoring activities in accordance with the job description. Aboriginal Groups will be required to enter into a contract with BW Gold to provide a Monitor, and the contract may include requirements for pre-employment screening testing, vaccination, insurance among other elements.

The Aboriginal Group will be responsible for notifying BW Gold if there are any changes to the appointed Aboriginal Monitor.

## **6.4 Funding for Aboriginal Monitors**

BW Gold is responsible for funding Aboriginal Monitors, by either employing the Aboriginal Monitor directly or by providing funding to the Aboriginal Group to retain a Monitor.

In discussion with each Aboriginal Group, BW Gold will determine the approach to payment which may involve either payment directly to the Monitor (e.g., in the case of a Monitor being retained by BW Gold

[Section 6.3.1]), or reimbursing the Aboriginal Group upon the provision of invoices (e.g., in the case of an Aboriginal Group retaining their Monitor directly [Section 6.3.2]).

The compensation of Monitors will be equitable regardless if retained by BW Gold (Section 6.3.1) or an Aboriginal Group (Section 6.3.2). Notwithstanding, an Aboriginal Monitor retained by BW Gold may also be offered standard benefits provided to all employees (e.g., health insurance benefits). Where BW Gold retains the Monitor, the Monitor will be compensated directly in accordance with an employment agreement. Where an Aboriginal Group retains the Monitor, BW Gold will enter into a contractual agreement with the Aboriginal Group for retention of the Monitor.

In the case that BW Gold retains the Monitor, funding will be provided on a bi-weekly basis or as per the employment agreement, and in the case that the Aboriginal group retains the Monitor, funding will be provided on a monthly basis upon BW receipt and approval of an invoice from the Aboriginal Group in accordance with the approved contract. Where the Aboriginal Group retains the Monitor, it will be the Aboriginal Group's responsibility to pay the Monitor.

The amount of funding will be set out in either the employment agreement or the contractual agreement as appropriate and will be reflective of market conditions at the time of hire. The amount of funding (i.e., hourly rate) will be reviewed and updated as needed to reflect market conditions on an annual basis.

BW Gold is not required to fund the Monitor role during periods where there is no one willing or able to carry out the duties of a Monitor on behalf of that particular Aboriginal Group.

## 6.5 Communications with Aboriginal Monitors

BW Gold will confirm with Aboriginal Group(s) every four months to confirm the Monitor has been available and capable of carrying out the activities pursuant to the ToE. This confirmation is complementary to the Monthly Monitoring Plans (discussed in the ToE) in which the Aboriginal Monitor will identify their monthly monitoring schedule, anticipated training needs and equipment. This communication will focus on reporting to the Aboriginal Group that the Aboriginal Monitor:

- is aware of and has scheduled monitoring activities;
- has appropriate skills and capabilities to participate in monitoring and Project activities; and
- has appropriate equipment to participate in monitoring and Project activities.

As needed, BW Gold will work with the Aboriginal Group and Aboriginal Monitor to address scheduling, skills and equipment needs identified during this regular communication.

## **7. REPORTING STRUCTURE AND INCORPORATION OF INPUT FROM ABORIGINAL MONITORS**

The Project's roles and responsibilities and reporting is describes in Table 3-1. Aboriginal Monitors will report to the EM, and will also have lines of communication to the Indigenous Relations Manager and their Aboriginal Group.

Observations and monitoring results and other input from Aboriginal Monitors will be communicated directly to the EM. The EM will review and relay the information, as needed, to different departments or parts of the operation, as appropriate. As needed, meetings will be convened to discuss input from Aboriginal Monitors where there is discordant views or to refine the implementation. Meeting participants would include the BW Gold EM and Indigenous Relations Manager and 2 Aboriginal Group representatives.

The results of the monitoring and observations provided to the EM will be summarized by the Aboriginal Monitors, for BW Gold and the Aboriginal groups in monthly monitor reports (Appendix C).



## 8. COORDINATION OF ABORIGINAL MONITORS WITH THE EAO COMPLIANCE AND ENFORCEMENT

In accordance with the 2018 *Environmental Assessment Act*, EAO conducts inspections, complaint reviews, investigations and enforcement to support timely and effective oversight of projects (EAO 2020). At the beginning of each fiscal year, EAO prepares an annual inspection plan, and as needed, additional inspections may be conducted following a complaint, information received from an Aboriginal Group, other government agencies, the public, or as follow-up to previous inspections. Field inspections can be planned or spontaneous:

- Planned inspections are typically arranged with advance notice, including the timing and anticipated documents that will be requested during the inspection.
- Spontaneous inspections are announced when the C&E officer arrives on site.

BW Gold will provide opportunity for Aboriginal Monitors to participate in EAO field-based C&E activities<sup>2</sup> and the participation of Aboriginal Monitors will be aligned with the EAO's Policy and Procedures (EAO 2020). It is assumed the EAO will share its annual inspection plan with Aboriginal Groups, Aboriginal Monitors and BW Gold as the company is responsible for coordinating field inspections among all parties. This would include transportation arrangements to the mine site, providing accommodations, providing input into EAO's inspection schedule and transportation to inspection areas.

The participation of Aboriginal Monitors in C&E field activities is described in Table 8-1.

**Table 8-1: Aboriginal Monitor Participation in EAO C&E Inspections**

| Organization | Action  | Timing  |
|--------------|---|---|
| EAO C&E      | Provide annual schedule of compliance inspections to BW Gold and/or Aboriginal Groups and Aboriginal Monitors   | By end of January of each year                              |
|              | Provide detailed inspection schedule to BW Gold, including dates, areas to be inspected   | A minimum of 21 days prior to inspection date               |
|              | Provide a list of documents to be made available for review at the beginning of the inspection  | A minimum of 21 days in advance of the inspection date      |
| BW Gold      | Based on EAO's inspection schedule, organize transportation on BW Gold's shuttle, accommodations, and transportation to inspections areas (if needed)       | Within 24 hours of written notification by the EAO C&E Team |
|              | Check with Aboriginal Monitor(s) who are (or will be) on site during an EAO C&E Team inspection regarding their participation in the inspection activities. | A minimum of 14 days prior to a scheduled inspection        |

<sup>2</sup> It is not expected that Aboriginal Monitors will be involved in desktop C&E activities although BW Gold also supports monitors participating in desktop activities if requested by EAO.

| Organization              | Action   | Timing  |
|---------------------------|--|---|
| BW Gold ( <i>cont'd</i> ) | Relay information to EAO C&E Team to confirm Aboriginal Monitor participation (or regrets) | Within 24 hours of confirmation (or regrets) of notification by Aboriginal Monitors.<br><br>When Aboriginal Monitors have requested involvement, BW Gold will provide the EAO C&E Team with a written (e.g., emailed) request for participation and include the contact information of participating Aboriginal Monitors. |
|                           | Conduct Site Orientation for C&E Team participants   | Upon arrival at site  |
| Aboriginal Monitors       | Confirm or reject invitation to participate in EAO-led C&E field visit                     | Written response within 24 hours to BW Gold (and directly to EAO C&E Team)  |
|                           | Work with BW Gold to coordinate logistics for participation in the field visit             | In a timely manner, based on the timing (and level of advanced notice) of the field visit   |
|                           | Provide BW Gold with a list of any additional documents requested for review               | Written request within 48 hours (where possible) of C&E field visit   |

For unplanned field visits, it is the responsibility of the EAO's C&E Team to coordinate the participation of Aboriginal Monitors, using the contact information that is shared with them (section 8.2). Note that BW Gold may need to be involved in any logistics of transportation (and accommodation, if required) for Aboriginal Monitors that are involved in the field visit.

Aboriginal Monitors will be invited to attend the EAO's C&E Team inspection reporting sessions with mine personnel.

## 8.1 Contact Information Sharing and Timelines

Table 8-2 describes how BW Gold will facilitate sharing contact information between Monitors and the EAO's C&E Team.

**Table 8-2: Contact Information Sharing**

|  |   |
|--|---|
| <b>Provision of Aboriginal Monitor contact information to the EAO C&amp;E Team</b> | BW Gold will provide EAO C&E Team in writing with the contact information of the Aboriginal Monitor within 14 days of their retention by BW Gold, based on the start date.<br><br>If there is a change in Aboriginal Group Monitor, BW Gold will provide contact information of the new Aboriginal Group Monitor within 14 days of the start date of the new Monitor. |
| <b>Provision of EAO C&amp;E Team contact information to the Aboriginal Monitor</b> | Within 14 days of the Monitor's start date, BW Gold will provide the contact information for EAO's C&E team to the Monitor.<br><br>If there is a change in EAO's C&E contact, BW Gold will notify the Aboriginal Group Monitor within 14 days of being notified by EAO of the new contact information.  |
| <b>Provision of EAO C&amp;E Team contact information BW Gold</b>                   | It will be the responsibility of the EAO's C&E Team to notify BW Gold if there is a change in their contact information, in order that BW Gold is able to circulate the updated information to Aboriginal Monitors.   |

## 9. PLAN IMPLEMENTATION SCHEDULE

The AGMMP will be implemented throughout the following phases:

- Construction: Year -2 to Year -1;
- Operations: Year +1 to Year +23; and
- Closure: Year +24 to Year +45.

This plan will also be implemented during any care and maintenance periods.

Following engagement with Aboriginal Groups on the AGMMP, the implementation of the plan will start with the retention of Aboriginal Monitors (Section 6) and the implementation of the ToE (Appendix D).

Within the ToE, the Annual Conceptual Monitoring Plan and Monthly Monitoring Plan are described (Appendices D-[X] ). These plans are to be prepared by Aboriginal Monitors and will provide details on the scheduling of monitoring priorities covered by the plans.

## 10. REPORTING AND RECORD KEEPING

This section describes reporting and record keeping associated with the AGMMP.

### 10.1 Environmental Assessment Certificate Reporting

Condition 5 of the EAC sets out reporting requirements and requires the Holder [BW Gold] to submit a report to the attention of the EAO and Aboriginal Groups on the status of compliance with the EAC at the following times:

- a. At least 30 days prior to the start of Construction;
- b. On or before March 31 in each year after the start of Construction;
- c. At least 30 days prior to the start of Operations;
- d. On or before March 31 in each year after the start of Operations;
- e. At least 30 days prior to the start of Closure;
- f. On or before March 31 in each year after the start of Closure until the end of Closure;
- g. At least 30 days prior to the start of Post-Closure; and
- h. On or before March 31 in each year after the start of Post-Closure until the end of Post-Closure.

BW Gold will submit reports to EAO and Aboriginal Groups within the timelines specified in Condition 5.

### 10.2 Aboriginal Monitor Reports

Aboriginal Monitors are required to submit monitoring reports to BW Gold and the Aboriginal Group on a monthly basis unless notified by Aboriginal Monitors and agreed by BW Gold.

In discussion with their Aboriginal Group and in consideration of the Project monitoring activities, the reporting schedule may be modified; for example, more frequent reporting may be required during construction of the transmission line required. Additionally, in response to an unanticipated event (e.g., a spill of a hazardous material), more frequent reporting may be required.

The draft monthly reports will be provided to the EM for a 7-day factual review before providing a final report to both the EM and the Aboriginal Group. Final monthly reports will be submitted to BW Gold and their Aboriginal Group by the 14<sup>th</sup> day of the subsequent month (i.e., the monthly report for January will be submitted by February 14<sup>th</sup>). Reports will be provided in written digital format (unless otherwise agreed).

BW Gold's EM is responsible for data management, reporting and records for the Project. BW Gold's factual review will focus on aspects of the Aboriginal Monitor Report that incorporate data from the Project. This may include, for example number of water quality samples sent to a lab, time of an incident, or participation in an EAO compliance & enforcement inspections, etc. Review and edits will not focus on the observations or proposed mitigation measures. No changes to text. The Aboriginal Group Monitor is ultimately responsible for providing the report to the Aboriginal Group, and it will be up to the Aboriginal Group Monitor as to whether they accept or otherwise address the review comments of the EM.

BW Gold recognizes that reporting is one of the many responsibilities of Aboriginal Monitors and intends for the reporting content and process to be predictable and efficient. Appendix C presents a monthly report content and a proposed template.

The monthly monitoring reports will be made available to the IEM. In the case that information regarding Aboriginal values needs to be protected, BW Gold will work with the Aboriginal Group to provide such protection.



### 10.3 Record Keeping

Aboriginal Monitors will upload monitoring reports into an electronic database. Reports will be entered into a standard format that allows for data reporting and analyses, where appropriate. Monitoring reports will be stored, at a minimum, for 25 years following the end of decommissioning of the Project and will be made available to Aboriginal Groups for review upon request.

## 11. PLAN EVALUATION

This AGMMP will be reviewed annually to assess the plan's effectiveness and to ensure that it reflects roles and responsibilities of Aboriginal Monitors. Aboriginal Groups and Monitors will be involved in the annual review as follows:

- **Aboriginal Monitors:** BW Gold will meet with Aboriginal Monitors to seek feedback from Aboriginal Monitors, including ToE, roles and responsibilities, training, safety, equipment and reporting. Representatives of Aboriginal Groups that retain their Aboriginal Monitors will be invited to participate in these meetings.
- **Aboriginal Groups:** BW Gold will engage designated representatives of the Aboriginal Groups in an annual evaluation of the AGMMP. A minimum of one month before the annual review, BW Gold will notify representatives of the Aboriginal Group of the AGMMP review in order that they can solicit input from their Aboriginal Group and Monitor in the effectiveness of the AGMMP. The AGMMP will then be a topic of discussion on a meeting agenda.
- Notes and action items of the evaluation meetings will be documented and retained on file in accordance with Section 10.3.

The evaluation processes involving the Aboriginal Monitors and Aboriginal Group representatives will be coordinated in order that input can be collated, evaluated and implemented in an annual revision to the plan as required.

## 12. PLAN REVISION

The AGMMP is a living document that will evolve over time in response to feedback from Aboriginal Groups and EAO. Prior to adopting and implementing any changes to the AGMMP, proposed revisions will be provided to Aboriginal Groups for a 30 day review and comment period. Final versions of the plan will be provided to Aboriginal Groups and EAO as required by the condition.

### 13. QUALIFIED PERSONS

This management plan has been prepared by the following qualified person:

Prepared by:

Individual Aboriginal Group Monitoring Plans  
have been signed by the Qualified Person

---

Zoe Mullard  
Principal Consultant

## 14. REFERENCES

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

### Legislation

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

*Environmental Assessment Act*, SBC 2018, c 51.

*Impact Assessment Act*, SC 2019, c 28.

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

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<https://www.indigenousguardianstoolkit.ca/section/what-skills-and-training-do-indigenous-guardians-need>. Accessed September 2021.

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Yinka Dene 'Uza'hné. 2016. *Surface Water Management Policy (v 4.1)*. Available at: <http://darac.sg-host.com/wp-content/uploads/Yinka-Dene-Uzahne-Surface-Water-Management-Policy-March-18-2016-00303183xC6E53.pdf>. Accessed September 2021.

## **APPENDIX A      CONCORDANCE WITH ENVIRONMENTAL ASSESSMENT CERTIFICATE #M19-01 (JUNE 21, 2021)**

## Appendix A: Concordance with Environmental Assessment Certificate #M19-01

**Table A-1: Environmental Assessment Certificate # M19-01 Conditions and Location in AGMMP**

| Condition                         | Requirement   | Location in Plan   |
|-----------------------------------|---|--|
| Condition 2<br>(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:<br>a. purpose and objectives of the plan, program or other document;  | Section 2  |
|                                   | b. roles and responsibilities of the Holder and Employees;  | Section 3, Table 3-1   |
|                                   | c. names and, if applicable, professional certifications and professional stamps/seals, of those responsible for the preparation of the plan, program, or other document;   | Section 13   |
|                                   | d. schedule for implementing the plan, program or other document throughout the relevant Project phases;  | Section 9 and<br>Appendix D,<br>Section D.11   |
|                                   | e. means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness;   | n/a – The plan scope does not require the identification of mitigation measures to implement the plan. Section 11 discusses plan evaluation. |
|                                   | g. schedules and methods for the submission of reporting to specific agencies, Aboriginal Groups and the public and the required form and content of those reports; and process and timing for updating and revising the plan, program or other document, including any consultation with agencies and Aboriginal Groups that would occur in connection with such updates and revisions.  | Section 10 and<br>Appendix C<br>(Reporting);<br>Section 12<br>(Plan Revision)  |
| Condition 4<br>(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:<br>a. provide written notice to each such party that:<br>i. includes a copy of the plan, program or other document;<br>ii. invites the party to provide its views on the content of such plan, program or other document; and<br>iii. indicates: i. if a timeframe for providing such views to the Holder is specified in the relevant condition of this Certificate, that the party may provide such views to the Holder within such time frame; or ii. if a timeframe for providing such views to the Holder is not specified in the relevant condition of this Certificate, specifies a reasonable period during which the party may submit such views to the Holder; | This draft of the AGMMP is being provided to Aboriginal Groups for review and comment.   |



| Condition   | Requirement   | Location in Plan  |
|---|---|---|
| Condition 4<br>(Consultation; <i>cont'd</i> )               | <p>b. undertake a full and impartial consideration of any views and other information provided by a party in accordance with the timelines specified in a notice given pursuant to paragraph (a);</p> <p>c. provide a written explanation to each such party that provided comments in accordance with a notice given pursuant to paragraph (a) as to: i) how the views and information provided by such party to the Holder have been considered and addressed in a revised version of the plan, program or other document; or ii) why such views and information have not been addressed in a revised version of the plan, program or other document;</p> <p>d. maintain a record of consultation with each such party regarding the plan, program or other document; and</p> <p>e. provide a copy of such consultation record to the EAO, the relevant party, or both, promptly upon the written request of the EAO or such party. The copy of such consultation record must be provided to the EAO, relevant party, or both, no later than 15 days after the Holder receives the request for a copy of the consultation record, unless otherwise authorized by the EAO.</p> |   |
| Condition 17 (Aboriginal Group Monitor and Monitoring Plan) | For each Aboriginal Group, the Holder must retain, or provide funding to retain, a minimum of one monitor for each Aboriginal Group prior to commencing Construction. The monitors must be retained throughout Construction, Operations and Closure.  | Section 6.3   |
|   | The scope of the monitor's activities will be related to monitoring for potential effects from the Project on the Aboriginal Group's Aboriginal Interests.  | Section 5.1 and Appendix D (Section D.2)  |
|   | The monitor must be approved by the Aboriginal Group and the Holder, unless otherwise authorized by EAO.  | Section 6.1   |
|   | The Holder is not required to retain a monitor or fund the retention of the monitor, during periods where there is no one willing or able to carry out the duties of a monitor on behalf of that particular Aboriginal Group.   | Section 6.3   |
|   | Any Aboriginal Group may notify the Holder and the EAO in writing that the Aboriginal Group wishes to have the same monitor as another Aboriginal Group, rather than each having separate monitors, as well as specifying the time-period or Project phase over which this would occur.   | Section 6.1   |
|   | The Holder must develop an Aboriginal Group Monitoring Plan. The plan must be developed in consultation with Aboriginal Groups. The plan must include at least the following:   | This draft of the AGMMP was provided to Aboriginal Groups for review and comment. |

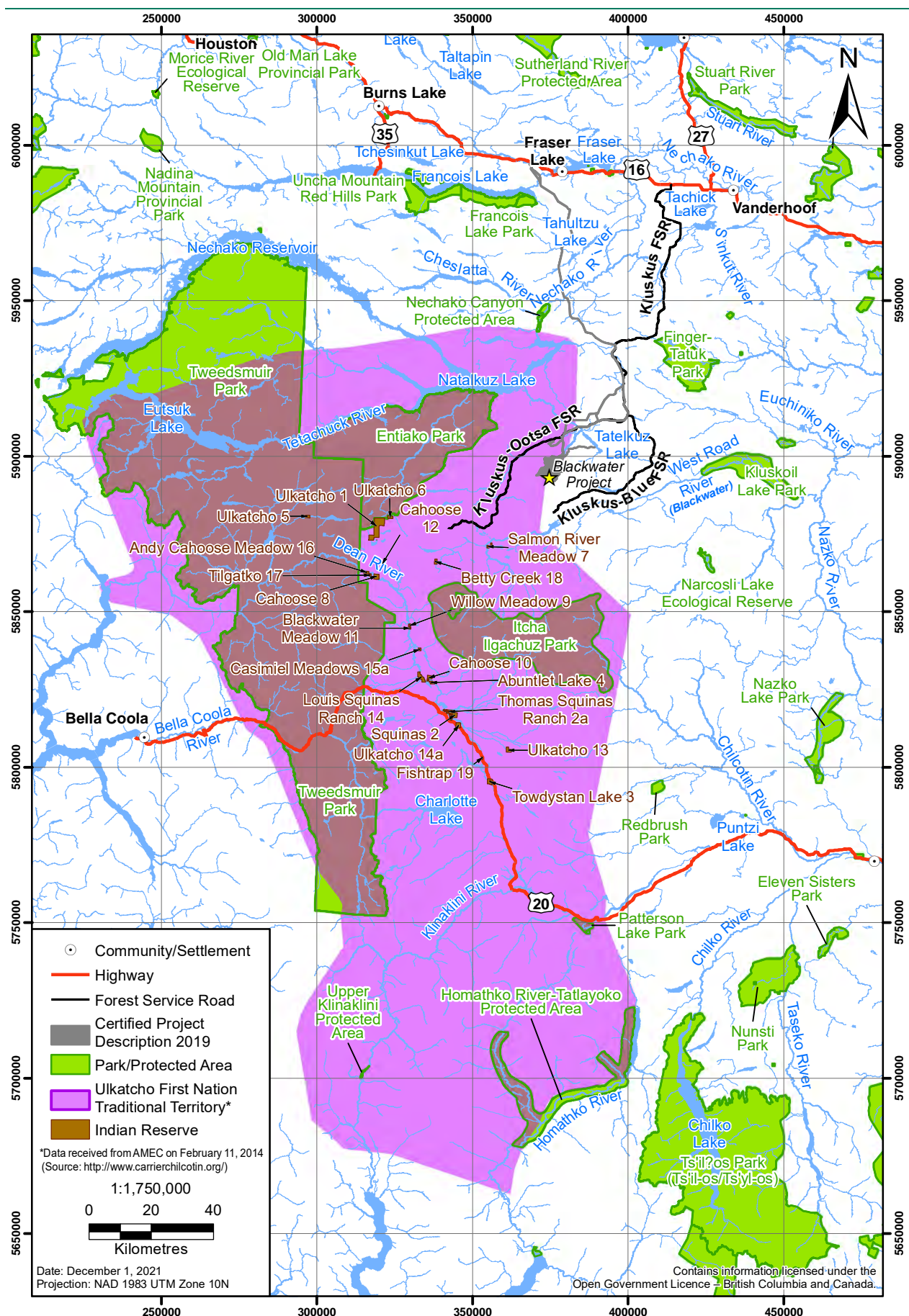
| Condition   | Requirement  | Location in Plan                           |
|---|--|--|
| Condition 17 (Aboriginal Group Monitor and Monitoring Plan; <i>cont'd</i> ) | a. a process for determining whether any Aboriginal Group prefers that the Aboriginal monitor be retained by the Holder or by the Aboriginal Group;  | Section 6.3                                |
|   | b. for monitors retained by the Holder, how the Holder will work with the Aboriginal Group(s) to identify, recruit and retain monitors through Construction, Operations and Closure; and   | Section 6.3.1                              |
|   | c. for monitors retained by the Aboriginal Group(s):   | Section 6.3.2                              |
|   | i. How the Holder will, on a regular basis, seek confirmation from the Aboriginal Group(s) that a monitor has been retained that is available to, and capable of, carrying out the activities in the terms of engagement; and                    | Section 6.5                                |
|   | ii. The process for the Holder to provide funding to the Aboriginal Group(s), including timing for provision of funds, in order for the Aboriginal Group to retain a monitor to conduct the activities set out in the Terms of Engagement.       | Section 6.4                                |
|   | For all monitors, the Holder must develop a Terms of Engagement in consultation with Aboriginal Groups. The Terms of Engagement must include at least the following:   | Appendix D                                 |
|   | d. the role and responsibilities of the monitor, including:  | Appendix D, Section D.6                    |
|   | i. the nature and frequency of the monitoring activities that will be conducted by the monitor, including the participation of the monitor in dam safety inspections and related activities, and activities during Care and Maintenance periods; | Appendix C and Appendix D, Section D.5     |
|   | ii. the means and methods by which monitoring activities are undertaken;   | Appendix D, Section D.5 and Appendix D-[X] |
|   | iii. opportunities to collect samples from water, soil and other environmental media and have them analysed; and   | Appendix D, Section D.5 and Appendix D-[X] |
|   | iv. participation in compliance inspections with the EAO;  | Section 8 and Appendix D, Section D.5      |
|   | e. protocols for access to the Project and access to monitoring locations;   | Appendix D, Section D.7                    |

| Condition   | Requirement  | Location in Plan         |
|---|--|--------------------------|
| Condition 17 (Aboriginal Group Monitor and Monitoring Plan; <i>cont'd</i> ) | f. The training, equipment and support that will be provided to the monitors to support the monitoring activities identified in paragraph d), including:<br>i. safety equipment and training;  | Appendix D, Section D.10 |
|   | ii. technical support and access to specific expertise; and  | Appendix D, Section D.10 |
|   | iii. training prior to the Project phase where those activities will occur, or where a monitor is retained by the Holder or Aboriginal Group after that phase has begun, the training must be provided prior to the monitor conducting those activities;   | Appendix D, Section D.10 |
|   | g. the provision of, and opportunity to review, plans, programs and other documents required under this Certificate, and provision of reports by the monitor to the Holder and Aboriginal Groups, including:<br>i. the content of, and frequency for, reporting information to the Holder and the monitor's Aboriginal Group;  | Appendix D, Section D.8  |
|   | ii. a requirement that the monitor will be provided with a copy of any plan, program or document related to monitoring activities required by this Certificate within 7 days of a request from a monitor, unless otherwise authorized by the EAO; and  | Appendix D, Section D.8  |
|   | iii. timely notification to the monitor when plans, programs or documents have been updated.   | Appendix D, Section D.8  |
|   | h. how the monitor will receive direction from his or her Aboriginal Group on the values of importance to the Aboriginal Groups for monitoring;  | Appendix D, Section D.2  |
|   | i. where such information has been made available to the Holder, incorporation of any protocols that exist between the Aboriginal Groups as to monitoring activities in areas of overlapping asserted traditional territories; and   | Appendix D, Section D.3  |
|   | j. the means by which the Holder will ensure, on an ongoing basis, each monitor has the contact information for the EAO's Compliance and Enforcement team and how the Holder will request that the monitor contact the EAO's Compliance and Enforcement Team to advise if the monitor is interested in participating in any EAO inspections related to the implementation of conditions related to the monitor's terms of engagement. The contact information and request must be provided to monitors in written form. The Holder must provide the information and make this request to any new individual hired in the role as monitor, within 30 days of:<br>i. where the monitor is retained by the Holder, the starting date for that individual's employment; or | Section 8.1 and 8.2      |
|   | ii. where the monitor is retained by the Aboriginal Group, the date that the Holder is notified by the Aboriginal Group that a new monitor has been retained.  | Section 8.1 and 8.2      |
| Condition 3 (Adaptive Management), does not apply to this Condition.        |  | n/a                      |

| Condition   | Requirement   | Location in Plan   |
|---|---|--|
| Condition 17 (Aboriginal Group Monitor and Monitoring Plan; <i>cont'd</i> ) | <p>The Holder must provide the draft plan and draft terms of engagement that were developed in consultation with Aboriginal Groups to 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.</p> <p>The plan and terms of engagement, and any amendments thereto, must be implemented prior to Construction and during Construction, Operations and Closure, and to the satisfaction of the EAO.</p> | BW Gold provided the draft plan to the parties as required by the condition. |

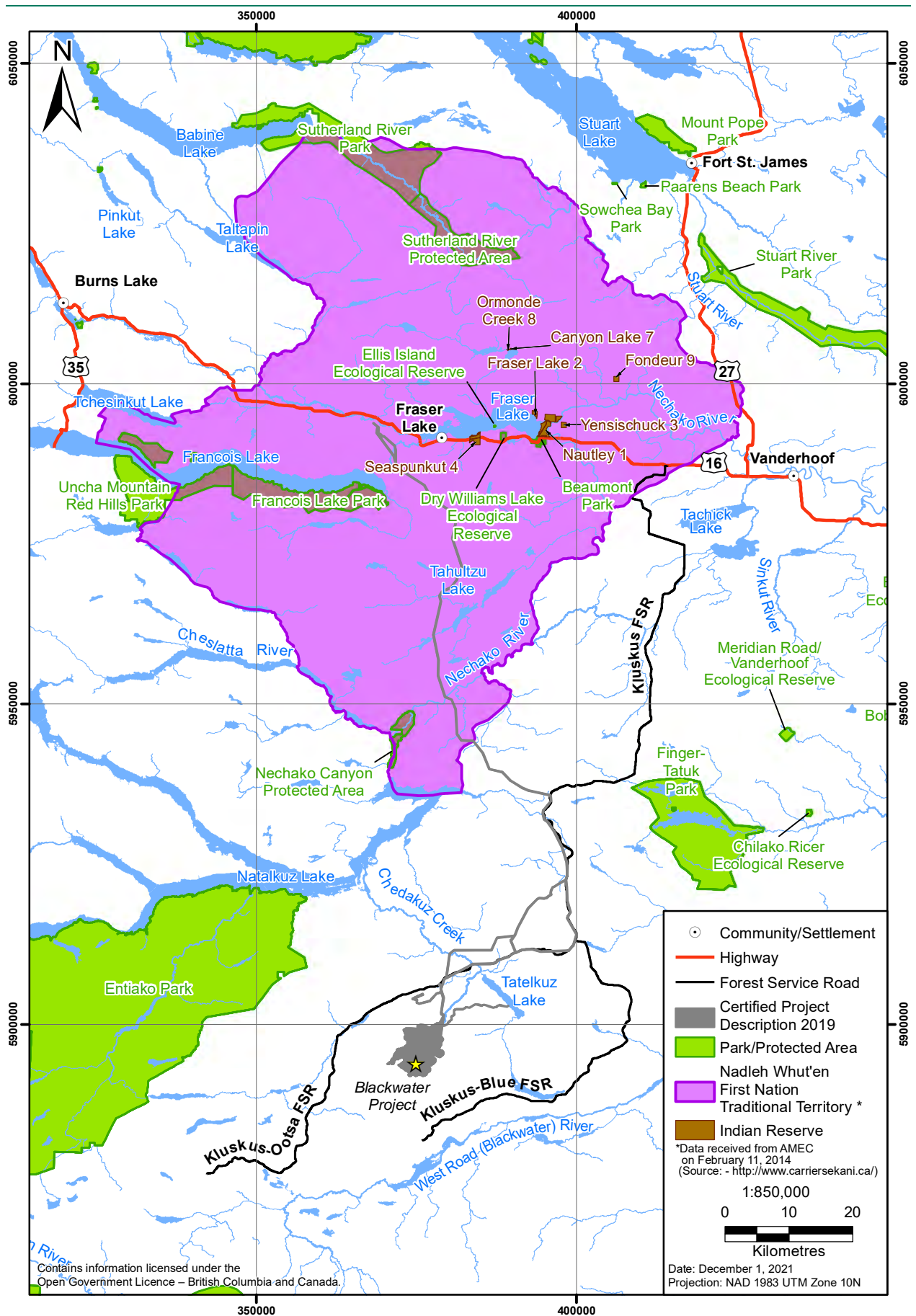
## **APPENDIX B      ABORIGINAL GROUPS' TERRITORY MAPS**





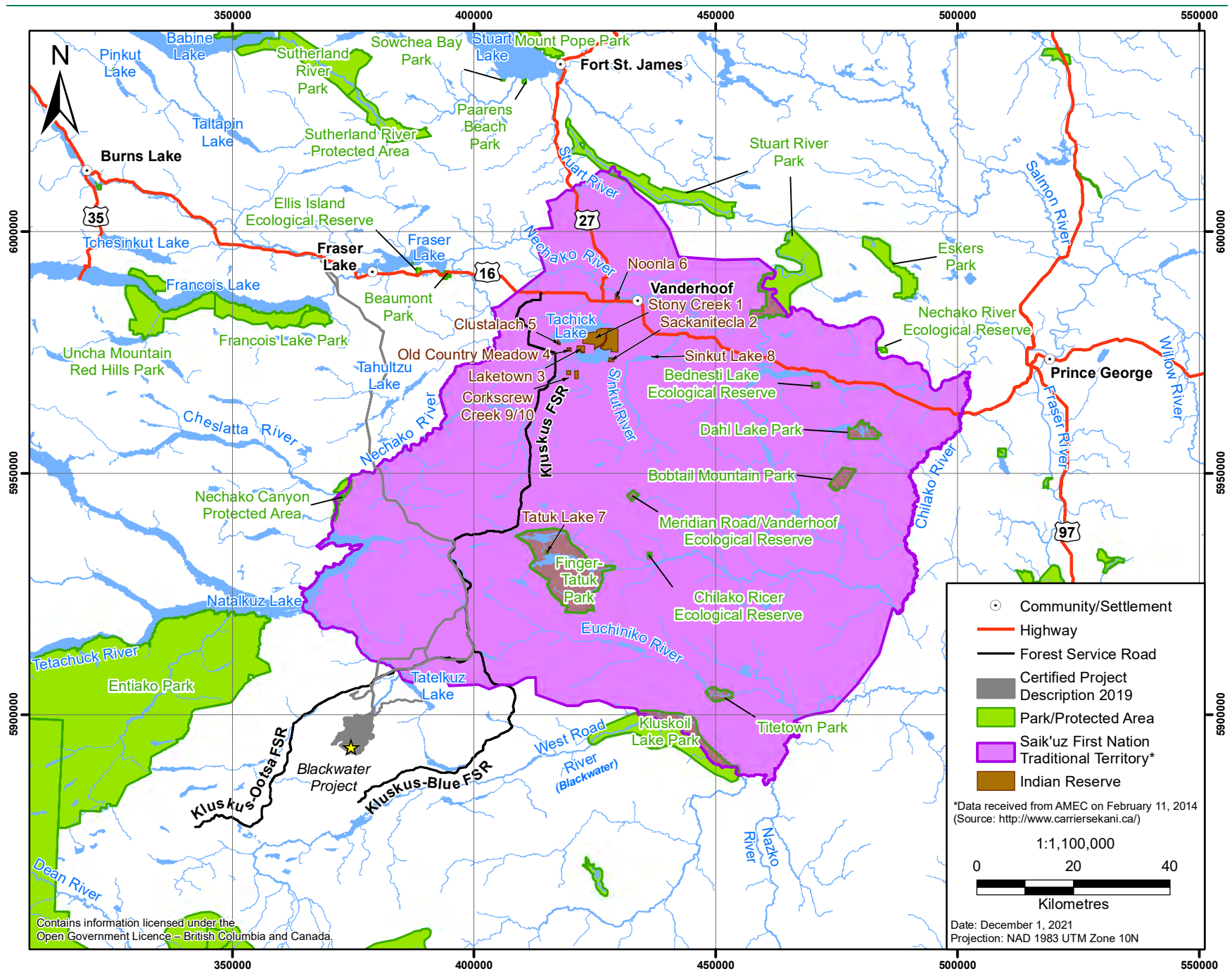
**Figure B-2: Ulkatcho First Nation Traditional Territory and Indian Reserves**





**Figure B-3: Nadle Whut'en First Nation Traditional Territory and Indian Reserves**





**Figure B-4: Saik'uz First Nation Traditional Territory and Indian Reserves**





## **APPENDIX C      ABORIGINAL MONITOR MONTHLY REPORT CONTENT AND ANNOTATED TEMPLATE**



## Appendix C: Aboriginal Monitor Monthly Report Content and Annotated Template

|   |  |  |
|---|--|--|
| <b>Report Month:</b> <i>Month</i>   | <b>Aboriginal Group:</b> <i>Group Name</i>   |  |
|   | <b>Aboriginal Group Monitor:</b> <i>Monitor Name</i>   |  |
| <b>Days on Site:</b> #  | <b>Monitoring Locations:</b> <i>List of locations with recognition for limiting information pertaining to heritage cultural or other important sites</i>   |  |
| <b>Documents Reviewed:</b> <i>List of documents</i>                         | <b>Training provided:</b><br><i>List of training</i>   | <b>Training received:</b><br><i>List of training</i> |
| <b>Participation in EAO C&amp;E Inspections:</b> <i>Yes/No and Date</i>     | <i>Summary of findings, where applicable</i>   |  |
| <b>Environmental Monitoring Summary</b>                                     | <i>Summary of environmental monitoring activities. This may include, for example:</i> <ul style="list-style-type: none"> <li>■ <i>Number of water quality samples or monitoring approach, and observations</i></li> <li>■ <i>Wildlife observations</i></li> </ul> <i>See section below for supporting photos (to be numbered/referenced)</i> |  |
| <b>Heritage and Cultural Site Monitoring Summary</b>                        | <i>Summary of heritage and cultural site monitoring activities</i><br><i>See section below for supporting photos (to be numbered/referenced)</i>   |  |
| <b>Observations and Feedback Pertaining to Aboriginal Areas of Interest</b> | <i>Observations of mitigation and management measures in relation to the Aboriginal areas of interest (e.g., participation in identification of and installation of flagging near watercourses to delineate features identified to be protected)</i>   |  |

### Document Request Dashboard

#### Number and Type of Requests

| Status                   | Reports or Documents | Elder/Cultural Knowledge Holder | Other | Total |
|--------------------------|----------------------|---------------------------------|-------|-------|
| Total                    | #                    | #                               | #     | #     |
| Fulfilled                | -                    | -                               | -     | -     |
| Outstanding              | -                    | -                               | -     | -     |
| <b>Supporting Photos</b> |                      |                                 |       |       |

## APPENDIX D

### TERMS OF ENGAGEMENT

*Individual Terms of Engagement have been developed for LDN and UFN, CSFNs, and NFN. Common elements are included in the general example below.*

## Appendix D: Terms of Engagement [Aboriginal Group]

### D.1 General Terms of Engagement

This section provides the Terms of Engagement (ToE) for [Aboriginal Group] Aboriginal Monitors. This version of the ToE is focussed on the scope of work approved as part of the Early Works permitting as described in Appendix D-[X]). The ToE will be updated for subsequent project phases in accordance with Section D.11.

### D.2 [Aboriginal Group] Aboriginal Values and Focus of Monitoring

#### D.2.1 BW Gold Understanding of Values of Importance and Focus of Monitoring

Based on the EAO's Summary Assessment Report (EAO 2019) and Part C of the Blackwater Gold Mine Project Assessment Report (Keefer Ecological Services 2019 in EAO 2019a), the following summary provides BW Gold's understanding of [Aboriginal Group]'s values of importance in relation to the Project area.

*[Information specific to each Aboriginal Group]*

#### D.2.2 Aboriginal Monitor Confirmation of Values of Importance and Focus of Monitoring

Upon retention and on an annual basis, at a minimum, it will be the responsibility of the Monitor(s) representing [Aboriginal Group] to receive direction from [Aboriginal Group] regarding their values of importance and focus of monitoring activities. The approach for engaging and validating values of importance from community members of [Aboriginal Group] will be at the discretion of the Aboriginal Group and their Monitor(s). These values will be described in Annual Conceptual Monitoring Plans prepared by the Monitors and shared with BW Gold (see Section D.4).

#### D.2.3 Communications and Review of Aboriginal Values of Importance and Focus of Monitoring

On an annual basis, and in coordination with the review and development of [Aboriginal Group]'s Annual Conceptual Monitoring Plans (Section D.4) and associated schedules, the BW Gold Environmental Monitor (EM) will review and discuss [Aboriginal Group]'s values in relation to the Project with [Aboriginal Group] representatives, including the monitoring focus. *[Information specific to each Aboriginal Group]*

### D.3 Monitoring Protocols

*[Information specific to each Aboriginal Group]*

### D.4 [Aboriginal Group] Monitoring Plans

In alignment with the Project's monitoring plans and schedule and to facilitate monitoring values of importance to [Aboriginal Group], the Monitor will be required to prepare:

- Annual Conceptual Monitoring Plans; and
- Detailed (30 day) Monthly Monitoring Plans.

Appendix D-[X] and Appendix D-[X] provide annotated table of contents for the Monthly Monitoring Plan and Annual Conceptual Monitoring Plan, respectively. Each plan is briefly described below.

In the case that an Aboriginal Group is retaining a Monitor in a shared manner with another Aboriginal Group, BW Gold will work with the Aboriginal Groups to determine the approach to preparing, reviewing and submitting the Annual and Monthly Monitoring Plans.

*[Information specific to each Aboriginal Group]*

#### D.4.1 Annual Conceptual Monitoring Plan

The Annual Conceptual Monitoring Plan (Appendix D-[X]) will describe Monitor's strategic priorities for monitoring for the upcoming year, taking into account planned project activities and input from the Monitor's Aboriginal Group. The priorities will provide BW Gold with an awareness of *[Aboriginal Group]* monitoring priorities and will help BW Gold align these priorities with the Project's overall monitoring plans. BW Gold will also review the Annual Conceptual Monitoring Plan in order to plan for and arrange, if necessary, transportation and accommodation logistics for *[Aboriginal Group]* Monitors.

The first Annual Conceptual Monitoring Plan will focus on monitoring activities related to *[Information specific to each Aboriginal Group]*. *[Aboriginal Group]* Monitors will also be able to reference monitoring activities and frequency, as described in Project management plans and consolidated in Appendix [X], to help inform the development of the Annual Conceptual Monitoring Plan.

The Annual Conceptual Monitoring Plan will provide a foundation for operationalising monitoring activities and will include:

- *[Aboriginal Group]* monitoring protocols or procedures;
- Draft monthly schedule of monitoring priority areas or activities;
- Identify training needs to participate in monitoring activities;
- Identify the types of equipment needed for monitoring;
- Identify anticipated need for technical support with priority on technical support coming from mine site staff; and
- Describe monitoring reporting templates (in the case they have been developed or changed over time based on monitoring experience).

The Annual Conceptual Monitoring Plan will allow BW Gold to work with *[Aboriginal Group]* Monitors to proactively arrange training and procure equipment if needed, and to work to coordinate the Monitor's monitoring priorities with the Project's monitoring requirements.

#### *Annual Conceptual Monitoring Plan Review Timelines*

On an annual basis, starting no later than November 1st, BW Gold will initiate discussions with Monitors regarding the Annual Conceptual Monitoring Plan for the upcoming year.

A draft Annual Conceptual Monitoring Plan will be provided to BW Gold EM and Mine Manager by December 1<sup>st</sup> of each year for the following year for review and approval. BW Gold will provide any questions or comments on the draft Annual Conceptual Monitoring Plan to *[Aboriginal Group]* Monitors by January 15<sup>th</sup> of the subsequent year. It will be the Monitor's responsibility to address BW Gold's comments in consultation with their Aboriginal Group. *[Information specific to each Aboriginal Group]*

The first Annual Conceptual Monitoring Plan will be provided to BW Gold for review and approval within 30 days of commencement of *[Information specific to each Aboriginal Group]*. A proposed annotated table of contents for the Annual Conceptual Monitoring Plan is included in Appendix D-[X]. The Annual Conceptual Monitoring Plan will be updated at each change in project phase (Section D.11). In the event that a project status change triggering an update to the ToE (as described in Section D.11) occurs mid-



year, BW Gold will provide notice of the impending project status change 60 days prior to the change, and the Annual Conceptual Monitoring Plan update will be provided 30 days prior to the project status change.

The Annual Conceptual Monitoring Plan for the previous period would prevail until such time as a new Plan is adopted.

#### D.4.2 Detailed (30 Day) Monitoring Plan

Monthly (30 day) monitoring plans (referred to as Monthly Monitoring Plans) will detail [Aboriginal Group] monitoring activities for the upcoming month including locations (e.g., monitoring stations), timing and frequency of monitoring activities. Appendix D-[X] provides a proposed outline for the monthly monitoring plan.

*[Information specific to each Aboriginal Group]*

##### *Monthly Monitoring Plan Review Timelines*

The Monthly Monitoring Plan will be provided to the BW Gold EM for review and approval by [Information specific to each Aboriginal Group]. The EM will work with the Monitor to address any comments identified in their review. If agreement cannot be reached on the Monthly Monitoring Plan, BW Gold will provide a written rationale of its position on any areas of disagreement before the start of the month.

The first detailed monthly (30 day) Monitoring Plan will be prepared and submitted to the EM for review and approval within seven (7) days of commencement of [Information specific to each Aboriginal Group]

*[Information specific to each Aboriginal Group]*

The Monthly Monitoring Plan for the previous period would prevail until such time as a new Plan is adopted.

#### D.5 Scope of Monitoring Activities

Aboriginal monitoring activities will evolve over the life of the Project in relation to the phases and activities. BW Gold will continue to engage [Aboriginal Group] regarding the evolving scope of monitoring taking into account the Project's management plans (summarized in Appendix D-[X]) and the potential effects of the Project on Aboriginal Groups' Interests. Additionally, the Annual Conceptual Monitoring Plan and detailed Monthly Monitoring Plans (Section D.4) will reflect the evolving monitoring priorities. Discussions around the scope of [Aboriginal Group] monitoring will:

- Review priorities outlined in the annual and monthly monitoring plans;
- Identify the nature and frequency of monitoring activities, including participation in dam safety inspections and related activities;
- The means and methods by which monitoring activities are undertaken; and
- The opportunities to collect samples from water, soil and other environmental media and have them analyzed.

*[Information specific to each Aboriginal Group]*

## D.6 Roles and Responsibilities

Aboriginal Monitors are responsible for monitoring the Project's potential effects on the Aboriginal Interests for the Aboriginal Group that they represent. In many respects, BW Gold's management and monitoring plans have been developed to mitigate impacts to Aboriginal Interests.

Table D.6-1 lists anticipated responsibilities for *[Aboriginal Group]* Monitors. Additionally Appendix D-[X] identifies the management plans, including high level monitoring requirements and frequencies associated with each plan. These tables will be reviewed and updated to incorporate monitoring requirements identified in permit conditions.

Aboriginal monitors' responsibilities include the tasks in Table D.6-1. This table will be updated for subsequent project phases.

**Table D.6-1: *[Aboriginal Group]* Monitor Anticipated Responsibilities in relation to Early Works Program**

| Task and Subtask   |
|--|
| <b>General Management, Engagement and Training</b>   |
| Prepare Annual Conceptual Monitoring Plan <sup>3</sup>   |
| Prepare Detailed (30 day) Monitoring Plans and Schedules <sup>4</sup>  |
| <b>Participate in Site Orientation</b>   |
| Participate in training (e.g., safety, technical, specific expertise) as needed to safely participate and lead monitoring activities                   |
| Be familiar with their Aboriginal Group's Interests in the Project and the expectations of the group they represent                                    |
| Participate in annual review of the monitoring schedule for the upcoming year  |
| <b>Site Inspections</b>  |
| Participate in inspections led by EAO's C&E Team   |
| Participate in inspections led by the IEM  |
| <b>Environment</b>   |
| Identify environmental resources that are valued by their Aboriginal Group and/or have sensitivities to Project impacts                                |
| Participate in monitoring including:   |
| ■ <i>[Information specific to each Aboriginal Group]</i>   |
| Participate in pre-construction and pre-clearing surveys   |
| As directed by the BW Gold EM and/or their Aboriginal Group, participate in environmental sampling, with qualified professionals including:            |
| ■ collecting samples from water, soil and other environmental media (e.g., plants, mammal tissues), and supporting in their preparation to be analyzed |
| <i>[Additional activities specific to each Aboriginal Group]</i>   |
| Participate, as necessary, in response and reporting in the case of a vehicle-wildlife collision along the FSRs  |
| Participate, as necessary, in response and reporting in the case of a spill along the FSRs   |
| Monitor the implementation of adaptive management plans, as related to the work scope  |

<sup>3</sup> During C&M, the development of this plan will depend on the length of any planned care and maintenance.

<sup>4</sup> During C&M, the development of these plan(s) will depend on the length of any planned care and maintenance.

| Task and Subtask   |
|--|
| <b>Cultural Heritage Resources</b>   |
| Identify cultural heritage resources that are valued by their Aboriginal Group and/or have sensitivities to Project impacts  |
| Participate in any pre-construction review of potential interaction with known archaeological or cultural / historical heritage sites                                  |
| Participate in monitoring, response and reporting when the chance find procedure is implemented  |
| <b>Reporting</b>   |
| Prepare monthly reports (Appendix C) for the BW Gold EM and <i>[Aboriginal Group]</i>  |
| Prepare reports and records for the BW Gold and Aboriginal Groups, as requested and in accordance with a schedule agreed upon between the Aboriginal Group and BW Gold |
| Observe and report on the implementation of mitigation measures intended to mitigate and minimize impacts on environmental and cultural heritage values                |
| Follow protocols (Section 10) for reporting information to Aboriginal Groups   |
| <b>Care and Maintenance (as applicable)</b>  |
| <i>[Additional activities specific to each Aboriginal Group]</i>   |

## D.7 Access to the Project Site and Monitoring Locations

*[Information specific to each Aboriginal Group]*

## D.8 Document Access and Review

BW Gold will provide Aboriginal Monitors with a copy of any non-confidential plan, program or document related to monitoring activities required by the Project's EAC M#19-01, within two (2) days of a request from a Monitor, unless otherwise authorized by the EAO.

BW Gold will provide notification to Monitors (e.g., by email or verbal communication) in the case that plans, programs or documents have been updated, with a particular attention to those documents pertaining to areas of interest for the Aboriginal Group. Notification will be provided within seven (7) days of an updated version being ready for review.

It is BW Gold's expectation that Aboriginal Monitors will respond to invitations to review documents in order that BW Gold can coordinate document reviews and revisions amongst Aboriginal Monitors and other reviewers.

- In the case that an Aboriginal Monitor is not able (or not interested) in reviewing a document review, BW Gold will be notified within three (3) days of receiving an invitation to review a document.
- In the case that an Aboriginal Monitor is undertaking review, an estimated timeline for completing their review will be provided within three (3) days of receiving an invitation to review a document.

Where BW Gold feels that a requested document is confidential, BW Gold will provide a response in writing as to why it has taken the position that a document must remain confidential.

## D.9 Aboriginal Monitor Schedule

Monitoring activities are linked to the Project phases and activities, as well as the Aboriginal Group's Interests.

*[Information specific to each Aboriginal Group]*

## **D.10 Training, Equipment, and Technical Support**

This section identifies the training, *[Information specific to each Aboriginal Group]* support that will be provided by BW Gold to support *[Aboriginal Group]* Monitors.

### **Training**

*[Information specific to each Aboriginal Group]*. The scope of training will be commensurate with the scope of monitoring to be undertaken by the Monitor. Training may include formal and on-the-job skills development.

Mandatory Site Safety and Environment Induction will be provided to all personnel and visitors upon arrival to site for the first time, or if it has been more than six months since the individual was last on site. In addition, BW Gold will use WorkSafe BC's young and new worker orientation checklist to ensure required training and orientation are provided.

*[Information specific to each Aboriginal Group]*

### **Safety Training**

Aboriginal Monitors may participate in safety training related to the following, as required by their Annual Conceptual Monitoring Plans:

- BW Gold's Environmental and Health & Safety policies and standard operating procedures;
- Personal protective equipment (PPE);
- Preventing workplace violence and harassment;
- Emergency response;
- Emergency procedures including spill response and incident reporting;
- Ergonomics awareness and risk reduction; and
- Hazardous material management.

Additional safety training may be provided, pending on the type of monitoring activities planned with Aboriginal Monitor. This training may include:

- Vehicle/Vessel operations; and
- First Aid Training (e.g., Wilderness First Aid, Basic First Aid).

### **Environmental and Cultural Heritage Monitoring Training**

Requirements for environmental and cultural heritage management and monitoring training will be based on the work scope defined in the Annual Conceptual Monitoring Plan and may include:

- Applicable regulatory obligations;
- No hunting / no fishing policy;
- Wildlife observation and interaction reporting procedures;
- Caribou awareness program;
- Bear awareness program;

- Whitebark pine awareness and identification;
- Waste management procedures;
- Wildlife-human interaction procedures (including management of wildlife attractants);
- Wildlife sensitive locations/timing as applicable; and
- Archaeological and Cultural Heritage Chance Find Procedure.

*[Information specific to each Aboriginal Group]*

Refresher training will be provided to all personnel biennially (every two years). Additional role-specific training will be provided to employees as required.

Training records will be maintained as appropriate and in accordance with legal requirements.

### **Equipment**

*[Information specific to each Aboriginal Group]*

### **Review and Confirmation of Training, Equipment and Technical Support**

BW Gold and the Aboriginal Groups will have an opportunity to review training and equipment needs as follows:

Training, equipment and technical support will be discussed in the review of the Annual Conceptual Monitoring Plan (Appendix D-[X]). *[Information specific to each Aboriginal Group]*

- As needed, training, equipment needs and technical support will have highlighted in the monthly monitoring plan (Appendix D-[X]). BW Gold will work with Aboriginal Groups to address those needs on an urgent basis in order that monitors can implement their monitoring as projected.

## **D.11 Terms of Engagement Revision**

This ToE will be reviewed and updated at minimum prior to project status changes, which are: commencement of major works construction, prior to the start of operations and closure. *[Information specific to each Aboriginal Group]*

With each revised version of the ToE, BW Gold will provide the revised version to *[Aboriginal Group]* at least 60 days prior to the above mentioned project stages or milestones. *[Information specific to each Aboriginal Group]*

The ToE for the previous period would prevail until such time as a new ToE is adopted.

*[Information specific to each Aboriginal Group]*

## APPENDIX D-[X] ANNUAL CONCEPTUAL MONITORING PLAN CONTENT

## Appendix D-[X]: Annual Conceptual Monitoring Plan Content

The following provides an overview of the proposed components of the Annual Conceptual Monitoring Plan, to be prepared by Aboriginal Monitors. As appropriate, to avoid duplication of effort, the Monitor can reference BW Gold management plan monitoring activities where their monitoring approach is aligned with what has been presented in the management plan.

### ■ Overview of Plan:

- Purpose of Plan.
- Annual Monitoring Priorities and Objectives.
- Monitoring Protocols.

### ■ Overview of Monitoring Activities:

- Description of monitoring activities and/or reference to Project management plans where monitoring activities are described. As appropriate, this section can reference monitoring measures described in Project management plans, such as those listed in Appendix D-[X]:
  - In the case of monitoring activities additional to the monitoring described in Project management plans, the overview of monitoring may include:
    - Objectives of monitoring;
    - Triggers/thresholds established within a management/monitoring plan;
    - Monitoring methods (e.g., surveys, sampling);
    - Frequency;
    - Approach to analysis of monitoring data; and
    - Maps of areas for monitoring.

### ■ Calendar of monitoring:

- Overview of monitoring priority by month.

### ■ Training:

- Training requirements to support monitoring.
- Suggestions on timing and delivery of training, where applicable.

### ■ Equipment:

- Equipment requirements, by month to align with monitoring schedule.

### ■ Monitoring Reports:

- Timelines of any monitoring reports additional to the BW Gold Monthly Report (Appendix [X]), and as agreed upon with the Aboriginal Group and BW Gold.
- Report Templates.

■ **Plan Preparation and Review:**

- Names of Aboriginal Group members involved in the preparation and review of the Annual Conceptual Monitoring Plan.

■ *[Additional sections specific to each Aboriginal Group]*



## APPENDIX D-[X] MONTHLY MONITORING PLAN CONTENT

## Appendix D-[X]: Monthly Monitoring Plan Content

The following presents proposed content for the detailed Monthly (30 day) Monitoring Plan, to be prepared by Aboriginal Monitors and provided to the EM *[Information specific to each Aboriginal Group]*.

### ■ Overview of Monthly Monitoring:

- Overview of monthly monitoring priorities.

### ■ Calendar of Monitoring Activities:

- Calendar of monitoring activities (as proposed in Table D-[X].1). This section will outline the monitoring activities for the month. In the case that there is a change or additional detail from the Conceptual Annual Monitoring Plan regarding the approach, it should be described in this section.
- In the case that the Aboriginal Monitor intends to participate in monitoring activities scheduled by the Project, IEM and/or C&E Team, it will be sufficient to reference the monitoring plan/schedule.
- As appropriate, this section may include maps that identify monitoring locations.
- A calendar or table approach (as described below) may be used.

### ■ Training:

- Identify any training requirements that are required to do the work (including any training not identified in the Annual Conceptual Monitoring Plan).

### ■ *[Additional sections specific to each Aboriginal Group]*

**Table D-[X].1: Calendar of Monitoring Activities**

| Date<br>(or<br>Timing<br>in the<br>month) | Aboriginal<br>Value | Project<br>activity or<br>potential<br>effect | Monitoring<br>Location<br>(e.g.,<br>monitoring<br>station, map<br>location) | Monitoring<br>Activity | Monitoring<br>Frequency | Reference<br>Monitoring<br>Plan<br>(where<br>applicable) | Required<br>Equipment<br>(type of<br>equipment<br>and<br>availability for<br>use in<br>monitoring) |
|---|---------------------|---|---|------------------------|-------------------------|--|--|
|---|---------------------|---|---|------------------------|-------------------------|--|--|

## APPENDIX D-[X] MONITORING PLAN SUMMARY TABLE

Appendix D-[X]: Monitoring Plan Summary Table

| Plan   | Requirement  | Plan Purpose  | Summary of Monitoring Requirements   | Monitoring Frequency<br>(location in plan)   |
|--|--|---|--|--|
| Air Quality and Fugitive Dust Management Plan                          | EAC Condition 20; Air Emissions Information Requirement Table  | To minimize air emission impacts on human health and the natural environment  | Monitoring is largely automated (e.g., meteorological stations and Thermo Scientific Partisol-FRM Model 2025i-D to measure particulate matter); visual monitoring of dust (areas of active surface earthworks, haul roads and waste and soil stockpiles). Site personnel will collect and replace the passive air sampling system (PASS), which monitor nitrogen dioxide and SO <sub>2</sub> . | Section 8.3 (Monitoring)   |
| Aquatic Effects Monitoring Program and Aquatic Effects Monitoring Plan | Joint Application Information Requirements for <i>Mines Act</i> and <i>Environmental Management Act</i> Permits Application (JAIR; Chapter 7; Aquatic Effects Monitoring Program Program) EAC Condition 30 (Aquatic Effects Monitoring Plan) | To monitor impacts on the aquatic receiving environment   | Includes water temperature, hydrology, water quality, fish spawning or escapement survey, sediment quality, toxicity testing, resources, and fish inventory and tissue monitoring.   | Section 4.2 (Locations, Timing and Frequency of Sampling), Tables 4.2-1, 4.2-1 and 4.2-3 in Aquatic Effects Monitoring Program Plan  |
| Caribou Mitigation and Monitoring Plan                                 | EAC Condition 22   | To monitor impacts on caribou and implementation of caribou offsetting plan   | Includes monitoring of habitat loss and alteration, access and sight lines, revegetation and mitigation measures, includes aerial surveys and telemetry studies, as well as monitoring of caribou offset area.   | Section 6.2 (Monitoring of Predicted Effects on Caribou), Table 6.2-1; Section 6.3 (Caribou Population and Distribution Monitoring); Section 6.4 (Offset Area Monitoring); Section 6.5 (Incidental Observations Monitoring); Section 6.6 (Caribou Mitigation Measures Monitoring), Table 6.6-1 |
| Chedakuz Creek and Tatelkuz Lake Surface Water Quality Monitoring Plan | EAC Condition 28   | To monitor impacts on Tatelkuz Lake and Chedakuz Lake upstream of Nechako Reservoir   | Includes hydrology, water temperature, water quality and fish spawning or escapement survey monitoring.  | Section 4.2 (Locations, Timing and Frequency of Sampling), Tables 4.2-1, 4.2-1 and 4.2-3 in Aquatic Effects Monitoring Program Plan  |
| Chemicals and Materials Storage Plan                                   | JAIR, Section 9.16   | To establish procedures for storing, transferring and handling chemicals and substances classified or deemed as potentially hazardous products, including toxic chemicals and substances, and dangerous goods | Includes monitoring of total waste generated.  | Section 12 (Monitoring)  |
| Closure and Post-closure Water Quality Management Plan                 | EAC Condition 34   | To manage water quality during closure and post-closure   | Plan to be developed (prior to planned commencement of operations and updated every five years).   | To be confirmed when plan in place in future   |
| Community Effects Monitoring and Management Plan                       | EAC  | To monitor socio-economic impacts   | Includes monitoring impacts on population and demographics, regional and community services, and family and community well-being.  | Section 10.4 (Approach to Impact Monitoring), Table 10.1-1   |
| Construction Environmental Management Plan                             | JAIR, Section 9.4 EAC Condition 13   | To minimize and mitigate potential impacts during construction  | Includes monitoring related to traffic and site access, metal leaching/acid rock drainage (ML/ARD), soils, chemical and materials, air quality, water quality, vegetation, wetlands, wildlife and cultural heritage resource.  | Section 15 (Monitoring)  |
| Country Food Monitoring Plan   | EAC Condition 40   | To monitor impacts on country foods and mitigate potential adverse effects on the health of Indigenous Peoples and other land users   | Includes soil, water quality, fish tissue, vegetation/berries and small mammals.   | Section 4 (Sampling Plan: Design, Frequency, Locations and Methods)  |
| Cultural and Spiritual Resources Management Plan                       | EAC Condition 18   | To mitigate impacts on known and as-yet unknown heritage resources or values  | Includes monitoring of known sites and as-yet-unknown sites.   | Section 10.1 (Monitoring)  |

| Plan   | Requirement                | Plan Purpose  | Summary of Monitoring Requirements  | Monitoring Frequency<br>(location in plan)  |
|--|----------------------------|---|---|---|
| Fish Habitat Compensation/<br>Offsetting Plans               | <i>Fisheries Act</i>       | To offset impacts associated with deposition of deleterious mine waste in fish-bearing waterbodies and habitat alteration, disruption and destruction (HADDs) | Includes compliance, functional and effectiveness monitoring related to implementation of offsetting plan.  | Section 6,.2 (Blackwater Fish Habitat Compensation Plan, June 2021).  |
| Invasive Species Management Plan                             | JAIR, Section 9.9          | To monitor and manage invasive plants and noxious weeds   | Includes monitoring of known invasive plant sites, recently disturbed areas, treated invasive plant sites and specific areas (e.g., junction of Mine Access Road and Kluskus-Ootsa FSR, truck washing bay and equipment yard).  | Section 9 (Monitoring), Table 9-1   |
| Mine Waste and Water Management Plan                         | EAC Condition 33           | To manage mine waste and water in a manner that is protective of the environment  | Will monitor year over year water accumulation in the tailings storage facility.  | To be confirmed when plan in place<br>(Plan to be developed 90 days prior to the commencement of placing tailings or waste rock into the tailings storage facility) |
| Mine Site Water and Discharge Monitoring and Management Plan | JAIR, Sections 9.6 and 9.7 | To monitor and manage surface water, groundwater and seepage water quantity and water quality   | Includes monitoring of effluent discharges (flow, chemistry, turbidity, field and acute toxicity);mine site water (analytical chemistry, flow, field); water treatment plants (analytical chemistry, flow, field, pH, turbidity); non-contact mine surface waters (analytical chemistry, flow, field); mine site groundwater (analytical chemistry, water level, field); seep survey locations (seep mapping, field, analytical chemistry). | Section 9 (Monitoring Summary),<br>Table 9-1.   |
| ML/ARD Management Plan                                       | JAIR, Section 9.5          | To manage and monitor ML/ARD potential  | Includes monitoring of waste rock and ore, tailings and overburden.   | Section 7 (Mine Waste Monitoring),Table 7.1-1   |
| Reclamation and Closure Plan                                 | JAIR, Chapter 4            | To provide detailed five year reclamation and closure plan  | Includes monitoring of reclamation material (salvaged soil and overburden) and sample plots to track ecosystem development.   | Section 4.2.6 (Reclamation Monitoring),<br>Table 4.2-9  |
| Soil Management Plan   | JAIR, Section 9.3          | To describe soil management activities, including soil handling, salvage and stockpiling.   | Includes soil salvage monitoring, visual inspections of soil stockpiles to assess revegetation status and presence of invasive species.   | Section 12 (Monitoring)   |
| Surface Erosion Prevention and Sediment Control Plan         | JAIR, Section 9.2          | To manage erosion and sedimentation   | Includes total suspended solids (TSS) and turbidity monitoring  | Section 9 (Monitoring), Table 9-1   |
| Tailings Dam Safety Transparency Plan                        | EAC Condition 35           | To identify and describe reports, reviews, inspections and meetings pertaining to tailing dam safety  | Provides for inclusion of Aboriginal monitors and other Aboriginal representatives in meetings and site inspections related to tailings dam safety.   | To be confirmed when plan in place  |
| Tatelkuz Lake Protection Plan                                | EAC Condition 31           | To monitor and mitigate effects of water withdrawals from Tatelkuz Lake   | Will monitor lake level drawdown on fish and fish habitat in littoral zone.   | To be confirmed when plan in place  |
| Transmission Line Sedimentation Monitoring Plan              | EAC Condition 29           | To avoid sedimentation in waterbodies during construction and maintenance of the transmission line.   | Will identify locations for turbidity monitoring upstream and downstream of transmission line.  | To be confirmed when plan in place  |
| Vegetation Management Plan                                   | JAIR (section 9.8)         | To monitor vegetation clearing ecosystems during construction and operations.   | Includes monitoring for vegetation clearing, revegetated areas, windthrow and riparian areas.   | Section 9 (Monitoring), Table 9-1   |
| Wetland Management and Offsetting Plan                       | EAC Condition 24           | To monitor impacts on wetlands and implementation of wetland offsetting plans   | Includes monitoring related to changes to wetland function and extent, offset sites (hydrogeomorphic observations, vegetation surveys, soil nutrient descriptions, wildlife observations, water quality (turbidity, major ions, nutrients, total and dissolved metals, cyanide, organic carbon, pH, conductivity, dissolved oxygen, and temperature).   | Section 11.4 (Timing and Frequency),<br>Table 11.4-1  |
| Whitebark Pine Management Plan                               | DS Condition 8.20          | To manage impacts on whitebark pine ( <i>Pinus albicaulis</i> )   | Includes but is not limited to cone collection, seedless propagation monitoring, blister rust monitoring, and monitoring the growth, health and rust impacts to seedlings over time.  | Section 4 (Monitoring), Table 4.1-1   |
| Wildlife Mitigation and Monitoring Plan                      | EAC Condition 23           | To manage impacts on wildlife in Project area (mine site and linear components) during construction, operations, closure and post-closure                     | Includes amphibian, bat, moose, furbearers, grizzly bear, bird and invertebrate monitoring.   | Section 4, Table 4.10-1   |
| Waste (Refuse and Emissions) Management Plan                 | JAIR, section 9.17         | To identify waste management strategies   | Includes visual inspections of waste management facilities.   | Monthly inspections of waste management facilities (Section 10)   |

## **APPENDIX D-[X] APPENDICES SPECIFIC TO EACH ABORIGINAL GROUP**