PREPARED FOR

Reclamation report Blackwater Mine

2023 Wetland Annual Reclamation Report

BW Gold Ltd

DATE
March 2024

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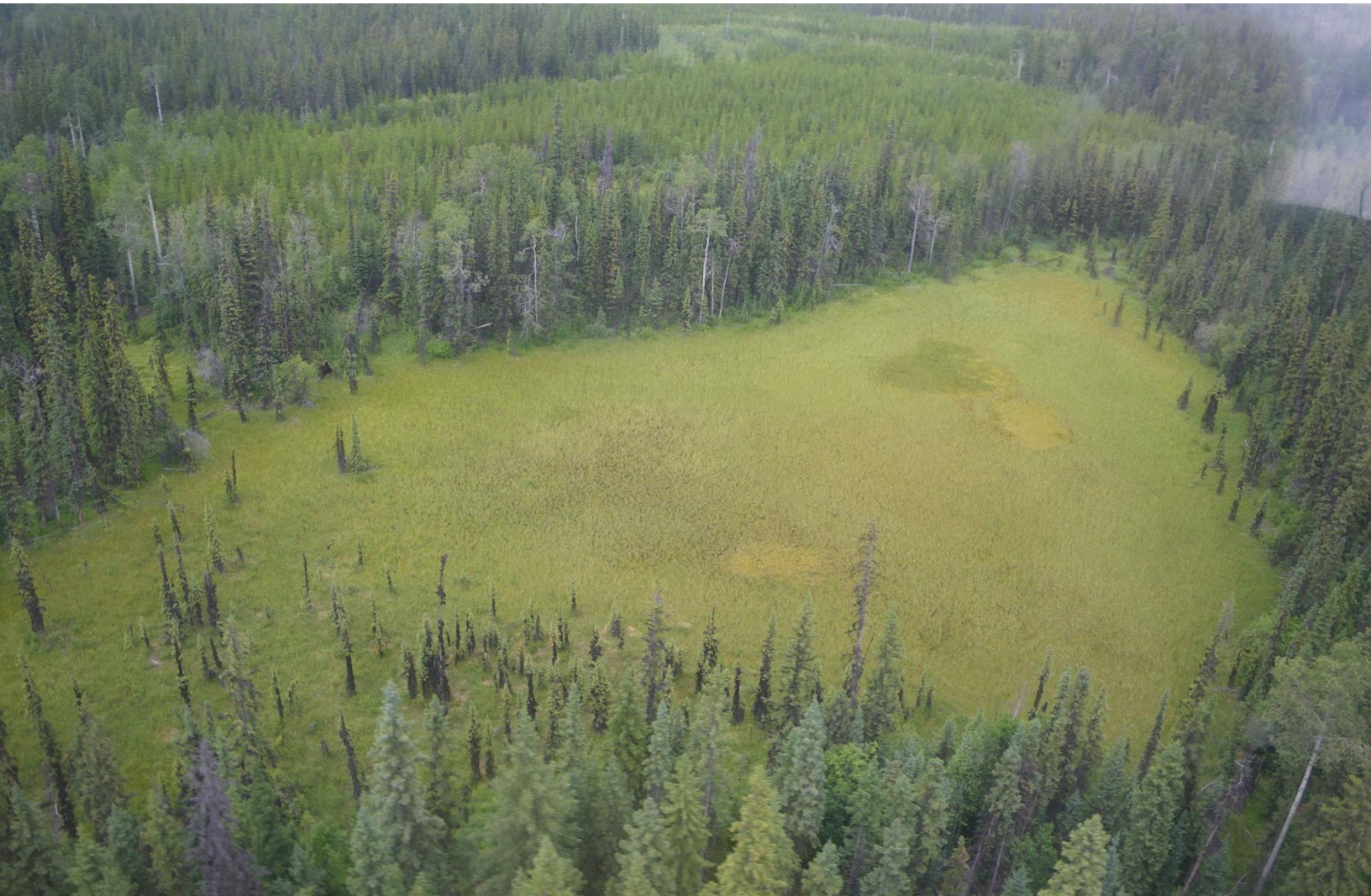

Blackwater Mine

2023 Wetland Annual Reclamation Report

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CONTENTS

LIST OF TABLES

LIST OF FIGURES

ACRONYMS AND ABBREVIATIONS

Artemis	Artemis Gold Inc
BC	British Columbia
BW Gold	BW Gold Ltd.
CEAA	Canadian Environmental Assessment Agency
CMMP	Caribou Mitigation and Monitoring Plan
DS	Decision Statement
EAC	Environmental Assessment Certificate
EAO	Environmental Assessment Office
ECCC	Environment and Climate Change Canada
EIS	Environmental Impact Statement
ERM	ERM Consultants Canada Ltd.
FSR	Forest Service Road
km	Kilometre
LDN	Lhoosk'uz Dené Nation
LSA	Local Study Area
Mine, the	Blackwater Mine
MT	Mitigation Table
New Gold	New Gold Inc.
Project, the	Blackwater Gold Project
TSF	Tailings Storage Facility
UFN	Ulkatcho First Nation
VC	Valued Components
WMOP	Wetland Monitoring and Offsetting Plan

1. INTRODUCTION

The Blackwater Mine (the Mine) is an open pit gold and silver mine currently under construction, located in central British Columbia (BC) 160 kilometres (km) southwest of Prince George, BC. The Mine 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 Forest Service Roads (FSR) and Mine transmission line cross the traditional territories of Nadleh Whut'en First Nation, Saik'uz First Nation, and Stellat'en First Nation (collectively, the Carrier Sekani First Nations) as well as the traditional territories of the Nazko First Nation, Nee-Tahi-Buhn Band, Cheslatta Carrier Nation, and Yekooche First Nation.

The Mine Construction phase is estimated to last two years and includes the establishment of 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. A 135 km, 230 kilovolt overland transmission line will supply electrical power to the Mine from the Glenannan substation BC Hydro grid. The gold and silver will be recovered into a gold-silver doré product and shipped by air and/or transported by road.

Early Works construction began in October 2022, and both early works and major works construction was undertaken throughout 2023. Construction works undertaken in 2023 included tree clearing and grubbing, as well as earthworks associated with the plant site, explosives magazine site, topsoil stockpiles, water management pond, TSF, borrow area and various mine site roads. Additionally, upgrades were completed on the existing camp area.

At this time, Mine 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 or12 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 from year 24 to approximately year 45, ending when the Open Pit has filled with water and the TSF is allowed to passively discharge to Davidson Creek. The Post-closure phase begins at 46+ years.

A Wetland Monitoring and Offsetting Plan (WMOP) was developed to manage potential Project-related adverse effects on wetlands during the Construction, Operations, Closure, and Post-closure phases (ERM 2024). The WMOP incorporates requirements from the Environmental Assessment Certificate #M19-01 (EAC), the federal Decision Statement (DS), and the master Mitigation Table (MT) which was approved by the BC Environmental Assessment Office in November 2020 to address EAC condition 43. This report presents the results of the wetland monitoring activities completed in 2023, following the WMOP. A concordance table tracking requirements from the DS and EAC is in Appendix A.

As defined by the WMOP and relevant Project conditions, an annual report will be prepared and will:

- summarize and present the results of the follow up programs and monitoring of mitigation measures during the previous year;

- include a table of concordance indicating where EAC and DS conditions have been addressed (see Appendix A);
- be sent to the EAO and Aboriginal Groups by March 31 the year following the reporting year;
- subsequently, be sent to Environment and Climate Change Canada (ECCC) and Indigenous groups for review and comment by June 30 of the year following the reporting year (DS condition 2.12); and
- be delivered in its final version to the Canadian Environmental Assessment Agency (now Impact Assessment Agency of Canada) by September 30 of the year following the reporting year (DS condition 2.13).

This is the first year the annual WMOP compliance report has been completed and as such, some of the monitoring activities have not yet been initiated.

1.1 PROJECT AREA

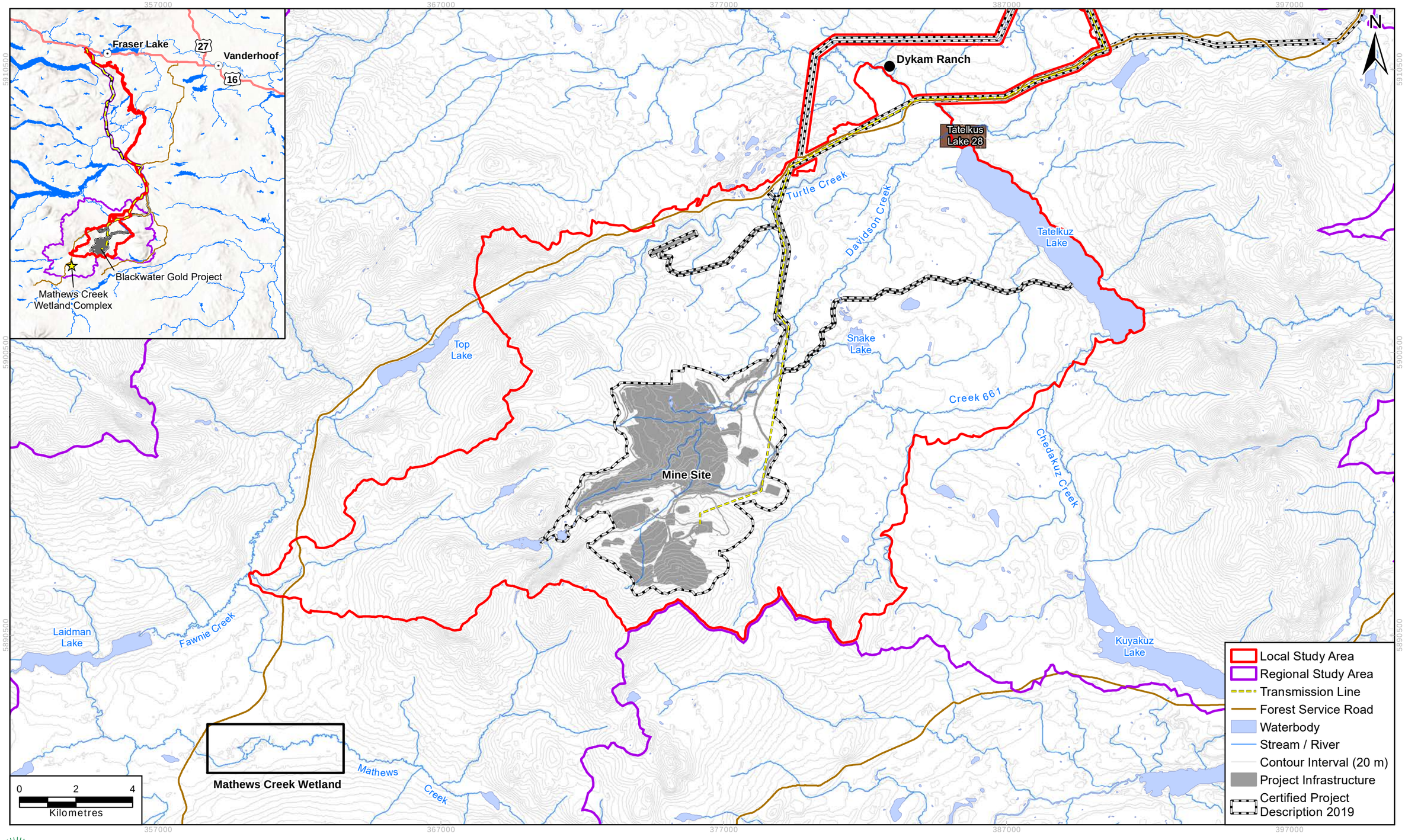
The Mine Site is located on the Nechako Plateau, characterized by sub-continental climate including brief warm summers and long cold winters from the influence of cold arctic air. The climate is also influenced by moisture-laden weather systems moving east by way of the low Kitimat ranges of the Coast Mountains of BC. Temperatures range from approximately -40 °C in winter to approximately 32 °C in summer. The mean annual precipitation is estimated to be 564 mm with 62% falling as rain and 38% as snow (KP 2021). Typically, precipitation falls as rain from May to September with snow starting to accumulate in October, and snowmelt occurring between April and May.

The surficial geology within the Mine Site consists of Quaternary and Holocene deposits. Morainal and glaciofluvial deposits are Quaternary in age with deposition associated with the last glacial period. Holocene sediments comprise materials deposited since the end of glaciation to the present and include fluvial, colluvial, and organic (peat) deposits.

The Mine area spans two ecoregions, the Fraser Plateau and Fraser Basin, and three ecosections, the Nazko Upland, Bulkley Basin, and Nechako Lowland. There are three biogeoclimatic (BGC) variants within the Mine Site: 1) SBSmc3 (Kluskus Moist Cold Sub-Boreal Spruce variant) at low elevation; 2) ESSFmv1 (Nechako Moist Very Cold Engelmann Spruce-Subalpine Fir variant) at medium and high elevation; and 3) ESSFmvp (Nechako Moist Very Cold Engelmann Spruce-Subalpine Fir Parkland) on top of Mount Davidson.

The Project effects assessment included six Project components: the Mine Site, Mine Access Road, Transmission Line, Freshwater Supply Pipeline, and Airstrip and Airstrip Access Road. The footprint of these Project components (i.e., the Mine Site and associated linear components) is referred to as the "Project Area" herein. The Mine Site local study area (LSA) and regional study area (RSA) for the wetland valued component (VC) used in the Application for an Environmental Assessment /Environmental Impact Statement were based on watershed drainage basins where Project components have the possibility to affect hydrological resources. Table 1.2-1 provides descriptions of the study areas and the linear components, and Figure 1.2-1 shows the locations of these features.

FIGURE 1.1-1 PROJECT AREA LOCATION AND MINE SITE SETTING



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CLIENT: BW Gold LTD.
GIS NUMBER: BLW-22-066

DATE: 03/27/2024

PROJECTION: NAD 1983 UTM Zone 10N
SCALE: 1:125,000 when printed at 11x17

TABLE 1.2-1: DESCRIPTION OF WETLAND LSA AND RSA

Study Area	Description	
Local Study Area	Mine Site	• Entire watersheds of Davidson Creek, Creek 661, Turtle Creek, and Creek 705. Tributaries flowing into the south side of Tatelkuz Lake; Chedakuz Creek from confluence with Creek 661 to Tatelkuz Lake; Chedakuz Creek from Tatelkuz Lake to confluence with Turtle Creek.
	Linear Components	• Transmission Line: 50 m wide running along the length of the new alignment (134.3 km long). • Mine Access Road: 15 km long, 120 m wide corridor. • Airstrip and Airstrip Access Road: Airstrip (2 km long, 200 m wide) including associated access road corridor (6 km long, 10 m wide). • Freshwater Supply Pipeline: Water Pipeline corridor (20 km long, 110 m wide).
Regional Study Area	Mine Site	• Entire watershed of Chedakuz Creek not included in the LSA. Includes entire watershed of Laidman Lake not included in the LSA.
	Linear Components	• Transmission line, mine access road, airstrip, freshwater supply pipeline, and Kluskus FSR upgrade – 500 m beyond the proposed linear component boundary.
Offsetting Sites	Mathews Creek Ranch	• Located 12 km southwest of the Project in the Nechako River watershed.
	Dykam Ranch	• Located 7 km northwest and downstream of Tatelkuz Lake, downstream of the Project in the Nechako River watershed.

1.2 OFFSETTING SITES

Offsetting is a requirement of both the provincial EAC (Condition 24) and the federal DS (Condition 5) and fulfills BW Gold's commitment to the Federal Policy on Wetland Conservation (Government of Canada 1991) of no net loss of wetland function.

1.2.1 MATHEWS CREEK RANCH

The Mathews Creek Ranch wetland complex was selected as a compensation site because of its proximity to watersheds and waterbodies impacted by the Project, also occurring within the Nechako River watershed, the same watershed as the Project Area, and location within the territories of the LDN and UFN where the majority of impacts to wetlands are occurring.

In 2013, BW Gold purchased two sections of private land at the Mathews Creek Ranch offsetting site. A large natural wetland complex exists at this site; however, it has been substantially degraded through years of agricultural use. The property is overlapped by a Range Tenure (RAN075042, retired in 2012), and displays evidence of past use of agronomic production and cattle grazing. Examples of degradation across the Mathews Creek Ranch site include cattle trails, presence of agronomic species and invasive species, creek crossings, fencing and built structures, and unstable and degraded banks along the creek.

1.2.2 DYKAM RANCH

The Dykam Ranch wetland complex was selected as an offsetting site because of the extremely high wetland values it provides in the region and the risk posed to it by agricultural and ranching activities. The long-term conservation of this wetland complex will support the preservation of ecosystem values for the life of the mine.

In 2022, BW Gold initiated conversations with the private landowner of Dykam Ranch to secure opportunities for conversation and enhancement of the Dykam Ranch wetland complex. Dykam Ranch is located along Chedakuz Creek, northwest and downstream of Tatelkuz Lake. The site contains a portion of an extensive wetland complex that is bisected by the Kluskus FSR. The Dykam Ranch portion of the wetland complex is located on the north side of the FSR and is generally intact and functional. The portion of the wetland complex located on the south side of the FSR has been cleared, drained, and is currently being used for agricultural practices. In addition, the riparian area around Chedakuz Creek has also been cleared. Dykam Ranch has been secured as an offsetting site and restoration activities will be discussed further with Indigenous groups.

1.2.3 CAPOOSE

In 2022, a Caribou Monitoring and Management Plan (CMMP) was developed to present mitigation and monitoring measures that will be implemented to avoid, reduce, and offset the Project's adverse effects on caribou and critical habitat. One of the objectives of the CMMP was securement of the approximately 11,000 ha Capoose offset area and reclamation of forestry roads within. The road rehabilitation activities are expected to also restore wetland function to an estimated 6.3 ha of wetlands currently impacted by roads. The area associated with these restoration activities will directly improve wetland ecosystems in the region and provide additional unofficial (i.e., non-credited) offsetting of the Project-impacted wetlands. These restoration sites have not yet been surveyed because they remain in the planning phase.

1.2.4 OTHER POTENTIAL OFFSETTING SITES

In 2023, an additional six potential offsetting areas were identified and assessed for potential as wetland offsets in collaboration with LDN and UFN, including sites along Creek 661, Van Tyne Creek, around Jonny Lake and Fawnie Creek, Laidman Lake, Tatscha Lake and a group of sites along the south shore of Natalkuz Lake (EcoLogic 2024). These included six potential sites that could provide opportunities for fish habitat and/or wetland restoration (WMOP Section 7.1.5, ERM 2024). These sites were investigated in the 2024 EcoLogic Blackwater Offset Alternative Proposal (WMOP Appendix E).

2. MONITORING REQUIREMENTS AND OBJECTIVES

The objectives of the WMOP annual report are to:

- Summarize and present the results of the follow up programs carried out the previous year, as outlined in the WMOP (ERM 2024);
- Summarize and present the results of the monitoring of mitigation measures carried out the previous year, as outlined in the WMOP (ERM 2024);
- Provide analysis of monitoring results to test impact predictions from the Environmental Impact Statement (EIS; New Gold 2015, ERM 2017), and
- Provide an overview of adaptive management actions carried out the previous year, along with the reasoning and outcome for each action.

3. ENGAGEMENT WITH INDIGENOUS GROUPS

BW Gold has engaged with Indigenous groups and key government agencies on wetland mitigation measures and wetland offset as early as Fall 2021. These engagement efforts are presented in Section 9.1 of the WMOP (ERM 2024).

4. EXISTING CONDITIONS SUMMARY

Existing conditions were surveyed for the Project Area and the Mathews Creek Ranch offsetting site in 2022. The 2022 surveys increased sampling intensity and updated field survey work previously conducted within the Mine Site LSA from 2011 to 2013, and Transmission Line in 2017. All wetland sample locations are shown on Figure 4-1, 4-2, and 4-3 for the mine site, Mathews Creek Ranch, and Dykam Ranch, respectively.

FIGURE 4-1 MINE SITE BASELINE WETLAND SURVEY PLOT LOCATIONS

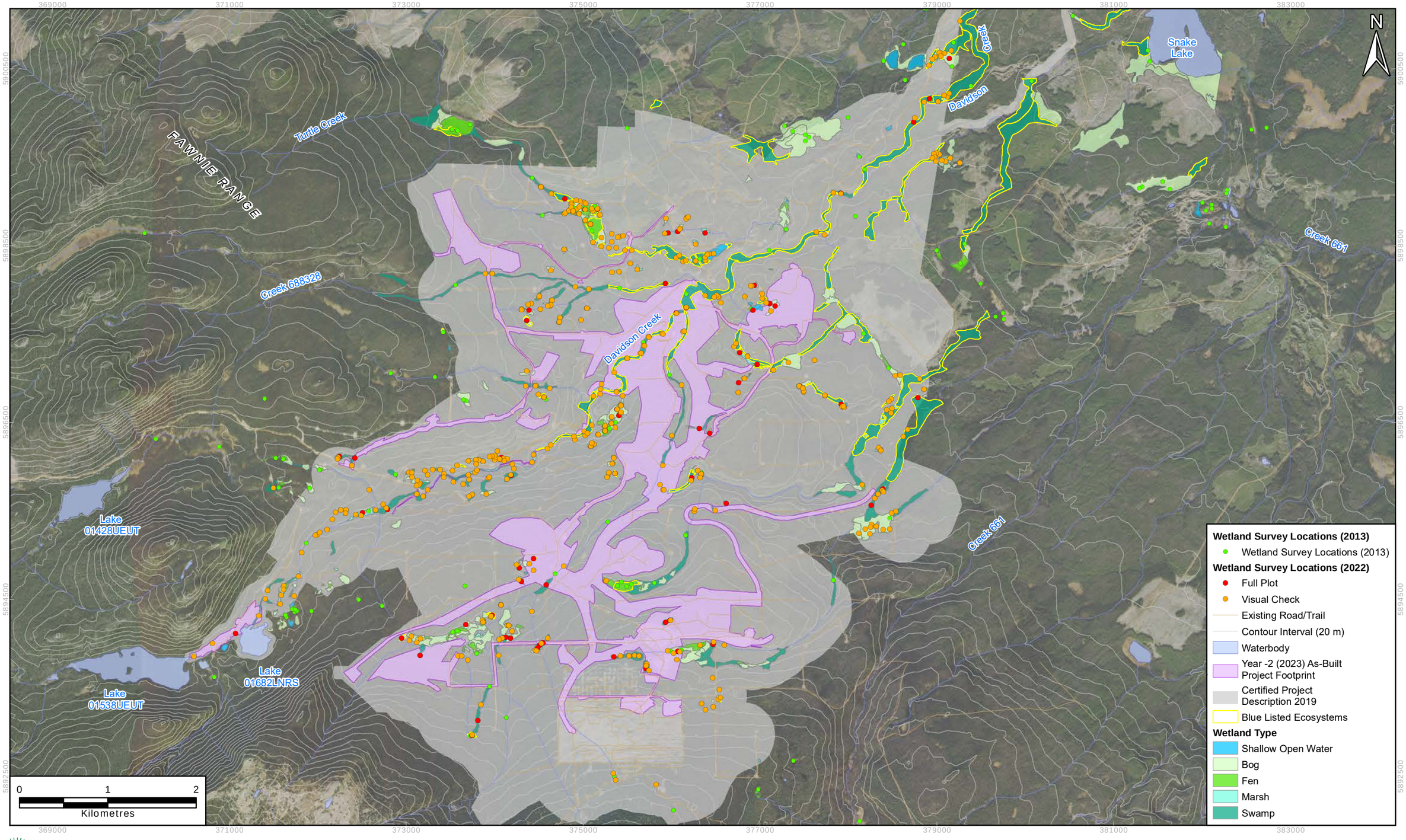

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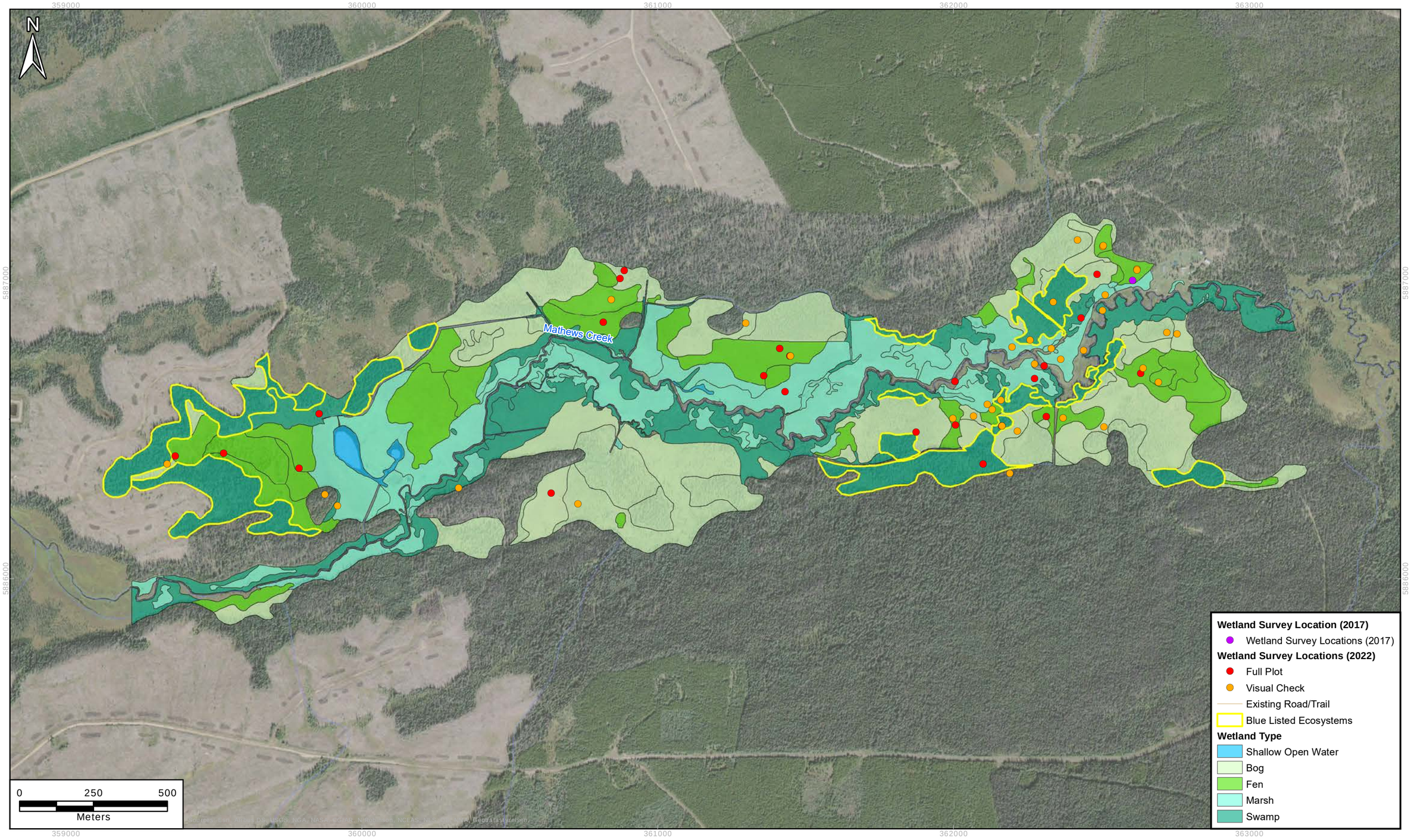
FIGURE 4-2 MATHEWS CREEK RANCH WETLAND BASELINE SURVEYS PLOT LOCATIONS



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DATE: 03/07/2024

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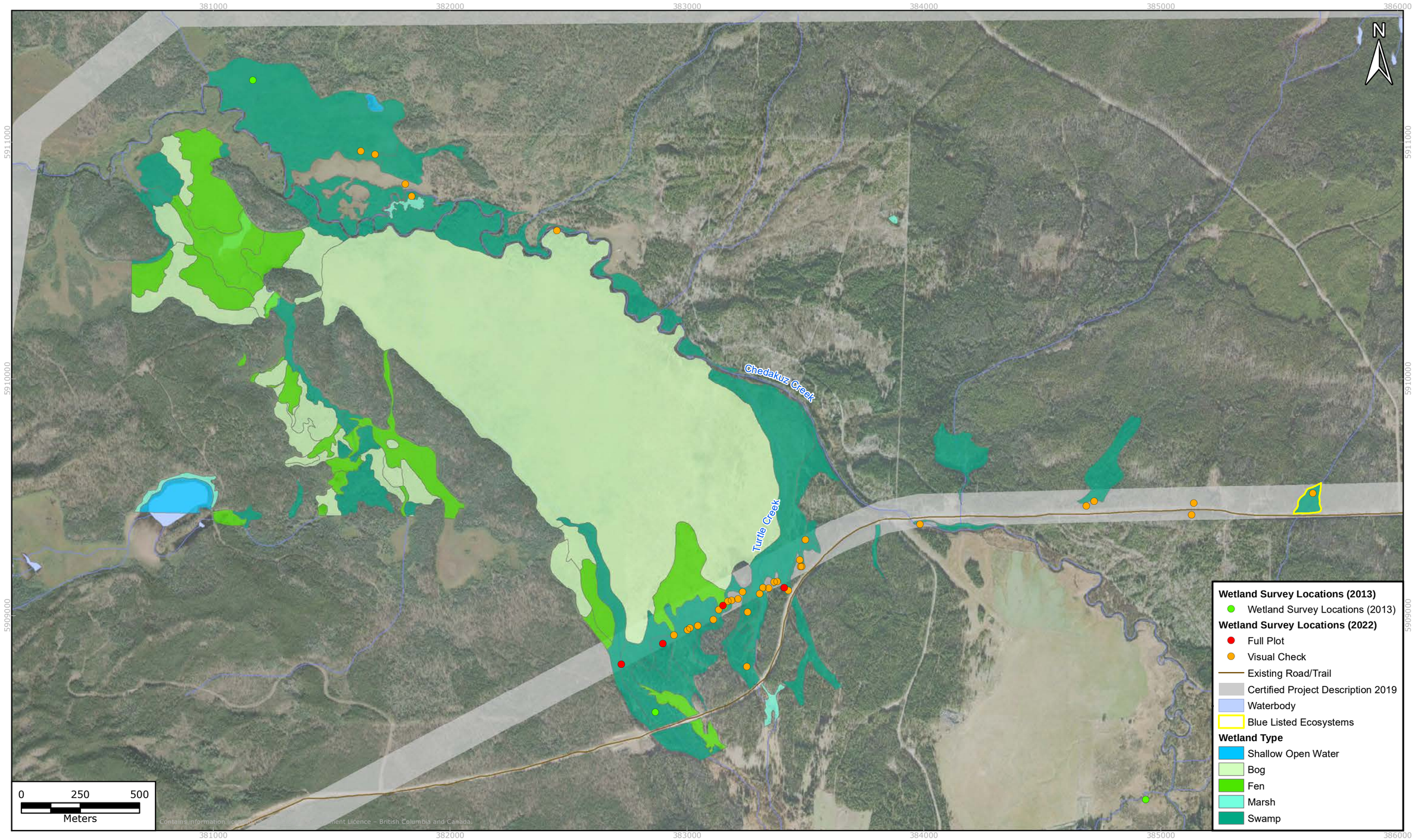
FIGURE 4-3 DYKAM RANCH WETLAND BASELINE SURVEYS PLOT LOCATIONS



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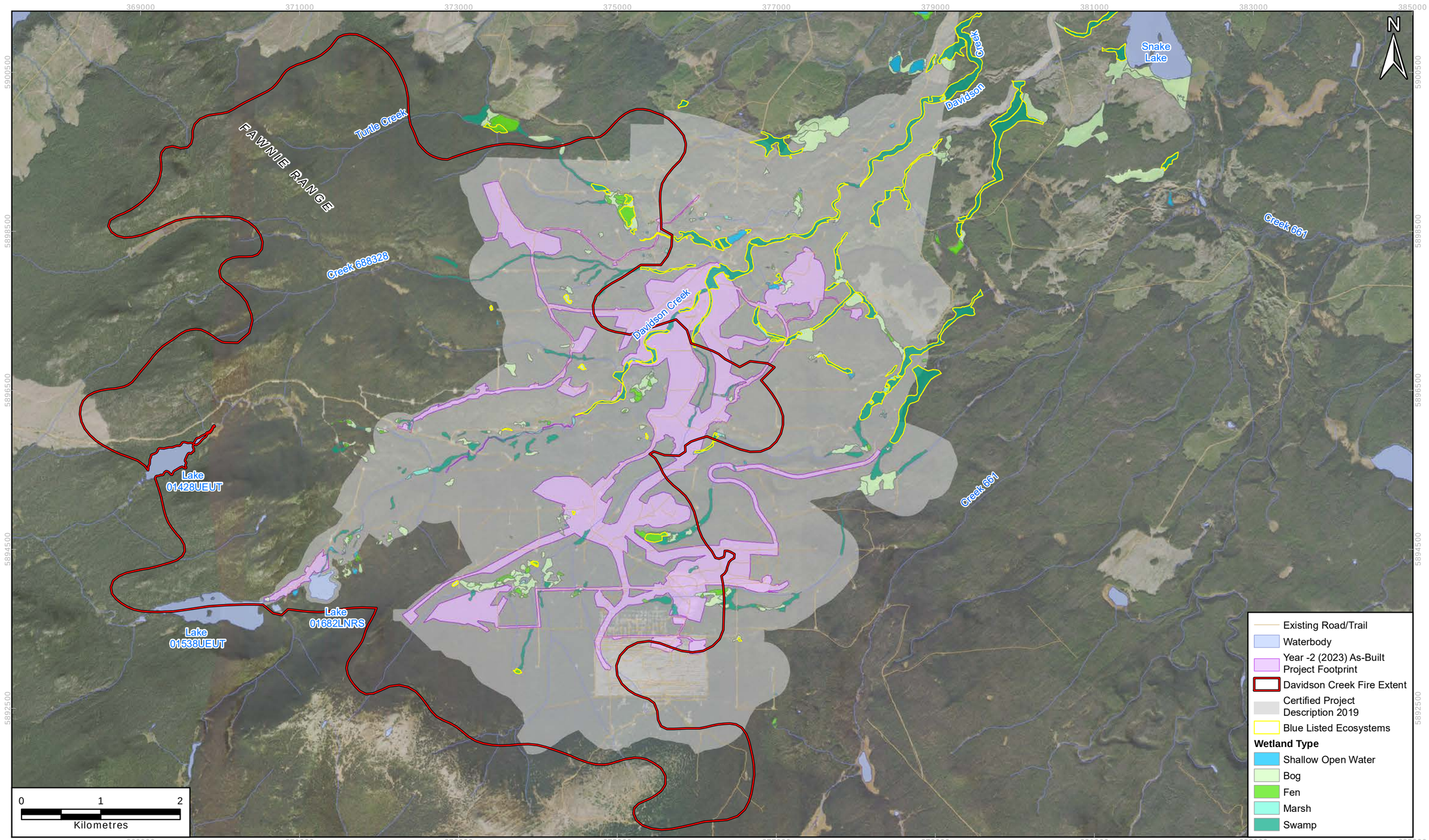
4.1 DAVIDSON CREEK WILDFIRE

In 2023, the Davidson Creek fire (July Wildfire; Fire Number: G41493; BC Wildfire Service 2022a) was discovered west of the Mine on July 10, 2023, impacting various site monitoring programs. The Blackwater camp was evacuated due to an uncontrolled wildfire in the area later that day. The site was closed for all non-essential employees and activities were resumed in a staged approach starting July 24, with construction resuming August 3. With respect to the Mine footprint, the fire extended from approximately kilometre marker (KM)8–KM16 along the Blackwater Access Road (Figure 1.1-1) and extended approximately 432.48 ha within the Year -2 (2023) as-built Project footprint. Some building structures were lost to the fire, including offices located directly across from the main facilities. The fire primarily affected standing timber and understory vegetation along smaller Mine roads on the western area of the mine site. The fire also caused damage to whitebark pine (*Pinus albicaulis*) areas, across lower and higher elevation regions south of the drill pad area.

Figure 4.1-1 illustrates the mapped wetlands impacted by the Davidson Creek wildfire, including listed wetlands in the Project Area. Using the BC data catalogue, the extent of the wildfire was obtained to determine potential impacts to wetlands within the mine site (BC Wildfire Service 2023b). A total of 127.29 ha of mapped wetlands were affected by this wildfire, 18.36 ha of which are blue-listed wetlands. Wildfires have the potential to reduce conductivity and dissolved organic carbon, while altering nutrient levels in wetlands (Burd et al. 2018). Changes in the water quality resulting from wildfires can influence ecosystem health and performance (McCullough et al. 2019). These wetlands are recorded and will be recognized as naturally disturbed for future monitoring purposes to ensure appropriate representation of changes to wetlands in the Project Area.

FIGURE 4.1-1 WILDFIRE IMPACTS AT DAVIDSON CREEK



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CLIENT: BW Gold LTD.
GIS NUMBER: BLW-22-065d

DATE: 03/07/2024

PROJECTION: NAD 1983 UTM Zone 10N
SCALE: 1:45,000 when printed at 11x17

4.2 RESULTS

4.2.1 PROJECT AREA

During 2022 wetland surveys in the Project Area (Ecologic 2023), a total of 82 full plots were sampled across 81 of the 681 wetland polygons, in addition to 562 visual checks completed across 283 vegetation polygons to delineate wetland boundaries and collect baseline information. Since wetlands along the Freshwater Supply Line were not mapped in 2022, wetland mapping as presented in the EA was used for this area. Wetlands intersecting Project infrastructure, based on the Year 23 Full Build-out footprint, are summarized in Figure 4-1 and Figure 4-2 by wetland class. Project component was attributed to the wetland polygon based on the intersecting feature within the Year 23 Full Build-out footprint.

Table 4.2-1 provides the baseline wetland area (ha), while Table 4.2-2 provides the same wetland data expressed in terms of baseline Functional Area for the full area of the wetland polygon. Functional Area, used to express wetland function as a unit of area, is calculated as the baseline Function Score for each individual wetland multiplied by the area of each individual wetland (WMOP Section 7.4, ERM 2024). Wetland Function Score is the sum of the functional values associated with each wetland in its existing state, assigned based on a rubric ranking system (WMOP Appendix J, ERM 2024).

TABLE 4.2-1: PROJECT AREA WETLANDS BY CLASS

Project Component[1]	Total Wetland Area (ha)					Total
	Bog	Fen	Marsh	Shallow Open Water	Swamp	
Mine Site	57.88	12.79	6.59	2.93	99.97	180.16
Mine Access Road	0.34	0.07	0.00	0.00	51.78	52.18
Transmission Line	11.94	15.58	0.29	0.00	94.14	121.96
Airstrip and Airstrip Access Road	0.00	0.00	0.00	0.00	2.42	2.42
Freshwater Supply Line	5.09	2.74	0.00	0.00	9.19	17.02
TOTAL	**75.25**	**31.18**	**6.88**	**2.93**	**257.50**	**373.74**

Notes: Includes wetland polygons that overlap (to any degree) the Predicted Year 23 Full Build-out footprint. This was achieved by selecting wetland polygons based on the spatial intersection with the Predicted Year 23 Full Build-out footprint, and full area of wetland reported.

[1]Project Component assigned based on the intersecting feature within the Year 23 Full-Build Out Footprint. Where multiple project components overlap the same wetland polygon, feature attribution was assigned in order of priority as follows: Mine Access Road, Mine Site, Transmission Line. The Airstrip Access Road and Freshwater Supply Line did not have common overlaps.

TABLE 4.2-2: PROJECT AREA WETLAND FUNCTIONAL AREA BY CLASS

Project Component[1]	Baseline Wetland Functional Area					Total
	Bog	Fen	Marsh	Shallow Open Water	Swamp	
Mine Site	1559	369	191	88	2619	4826
Mine Access Road	9	2	0	0	1347	1358
Transmission Line	327	435	8	0	2447	3217
Airstrip and Airstrip Access Road	0	0	0	0	63	63
Freshwater Supply Line	137	77	0	0	239	453
TOTAL	**2,032**	**883**	**200**	**88**	**6,715**	**9,917**

Notes: Includes wetland polygons that overlap (to any degree) the Predicted Year 23 Full Build-out footprint. This was achieved by selecting wetland polygons based on the spatial intersection with the Predicted Year 23 Full Build-out footprint, and full area of wetland reported.

[1]Project Component assigned based on the intersecting feature within the Year 23 Full-Build Out Footprint. Where multiple project components overlap the same wetland polygon, feature attribution was assigned in order of priority as follows: Mine Access Road, Mine Site, Transmission Line. The Airstrip Access Road and Freshwater Supply Line did not have common overlaps.

Twenty-four wetland site associations across four BGC units were observed within the Project Area during the 2022 baseline surveys. No red-listed wetland site associations were observed within the Project Area; however, several blue-listed wetland site associations were observed in 2022 baseline surveys by EcoLogic (EcoLogic 2023; Table 4.2-3; WMOP Section 7.3 and Appendix H, ERM 2024).

TABLE 4.2-3: BLUE-LISTED WETLANDS IDENTIFIED WITHIN THE PROJECT AREA

Blue-listed Wetland Association	Mine Site (ha)	Access Road (ha)	Transmission Line (ha)
Wb10	0.9	0.0	0.0
Wb13	0.3	0.0	0.0
Wf08	2.9	0.0	0.1
Wf11	0.4	0.0	0.0
Wf13	0.1	0.0	0.0
Ws07	36.6	0.4	11.3
Total	**41.2**	**0.4**	**11.4**

Note: Listed wetland ecosystems identified in Ecologic (2022).

4.2.2 OFFSETTING SITES

During 2022 wetland surveys at Mathews Creek Ranch offsetting site (EcoLogic 2023), a total of 23 full plots were sampled across 20 of the 245 vegetation polygons, in addition to 37 visual checks completed across 32 vegetation polygons to delineate wetland boundaries and collect baseline information (WMOP Section 7.3.2, ERM 2024). A total of 229.99 ha of wetlands were identified at Mathews Creek Ranch offsetting site (Table 4.2-4), amounting to a Functional Area of 6,300 (Table 4.2-4).

TABLE 4.2-4: MATHEWS CREEK RANCH WETLAND AREA AND FUNCTIONAL AREA BY CLASS

Mathews Creek Ranch Offsetting Site	Wetland Class					Total
	Bog	Fen	Marsh	Shallow Open Water	Swamp	
Area (ha)	78.27	38.75	48.03	1.68	63.27	**229.99**
Functional Area	2,115	1,074	1,388	50	1,673	**6,300**

Notes: Current wetland area and Functional Area as measured through field studies at Mathews Creek Ranch offsetting site in 2022 (Ecologic 2023). Reported values do not include canals (drainage ditches).

As within the Project Area (Section 2.4.1), no red-listed wetland site associations were observed within the Mathews Creek Ranch offsetting site. However, Ws07 (Spruce – Common horsetail – Leafy moss swamp site association) was observed (Table 4.2-5).

TABLE 4.2-5: BLUE-LISTED WETLANDS IDENTIFIED WITHIN THE MATHEWS CREEK OFFSETTING SITE

Blue-listed Wetland Association	Mathews Creek Ranch (ha)
Ws07	29.3
Total	**29.3**

Based on preliminary field reconnaissance undertaken in 2022, Dykam Ranch offsetting site includes 247.7 ha of wetlands, estimated at a Functional Area of 6,726 (Table 4.2-6). Listed wetlands have not been surveyed for at the Dykam Ranch offsetting site to date. Field surveys to verify and refine wetland mapping are planned, with current boundaries representing an estimate.

TABLE 4.2-6: DYKAM RANCH WETLAND AREA AND FUNCTIONAL AREA BY CLASS

Dykam Ranch Offsetting Site	Wetland Class					Total
	Bog	Fen	Marsh	Shallow Open Water	Swamp	
Area (ha)	91.80	73.70	5.60	2.70	73.9	**247.70**
Functional Area	2,471	2,028	161	81	1,976	**6,726**

Notes: Current area as predicted based on wetland mapping, with ground verification still needed. Since field surveys have not yet been conducted at Dykam, Functional Area is estimated using the average recorded function score for each wetland class measured in 2022 field studies across all wetland plots surveyed (Ecologic 2023). Reported values do not include non-wetland areas.

5. ANNUAL WETLAND LOSSES

5.1 METHODS

Wetland losses were assessed for the Project Area using a footprint analysis (WMOP Section 7.4.1, ERM 2024). Predicted losses were based on engineering site designs for Project infrastructure (WMOP Appendix K and L, ERM 2024); however, actual losses for Year -2 (2023) were based on the annual construction footprint (Year -2 as-built footprint) provided by BW Gold (WMOP Appendix M, ERM 2024).

Assessment of losses in wetland function considers both direct and indirect effects to wetlands entirely or partially overlapped by infrastructure, as well as indirect effects on surrounding wetlands without any direct overlap with infrastructure. Direct loss of wetland area (extent), and associated 100% loss in function, was considered for areas directly overlapped by the Year -2 as-built footprint. Indirect loss in function was assessed for remaining wetland areas (outside direct overlap) according to degree of indirect impact (WMOP Section 7.4.1, ERM 2024) – classified as either (1) High Impact: ≥ 50% overlap (100% loss); (2) Moderate Impact: ≥10% <50% overlap, fragmented/isolated wetlands, neighbouring ≥ 50% overlap (degraded/reduced function); or (3) Low Impact: 10% overlap (no loss). Details on how these impact categories were assigned are explained in WMOP Section 7.4.1 and Appendix M (ERM 2024).

Annual losses in wetland function reported in 2023 include direct loss (overlap) and indirect impacts to wetlands in the high impact category assumed to be fully lost (Function Score of 0). Indirect impacts in the moderate category and associated losses in wetland function due to degraded condition, will be assessed through future monitoring (WMOP Section 10, ERM 2024).

5.2 RESULTS

5.2.1 YEAR -2 (2023)

Direct wetland loss due to Project infrastructure and construction activities for Year -2 as-built footprint are illustrated in Figure 5.2-1, with losses presented in Table 5.2-1. No Project infrastructure was mapped in 2023 for the mine site. However, clearing and logging disturbances occurred throughout the Project footprint (Figure 5.2-1). This section will be updated annually to reflect as-built changes to the Project Area throughout the life of the mine.

TABLE 5.2-1: YEAR -2 (2023) WETLAND EXTENT AND FUNCTIONAL AREA LOSSES

Wetland Class	Wetland Site Associations	Area of Direct Loss by Site Association (ha)[1]	Area of Direct Loss by Wetland Class (ha)[1]	Number of Wetlands Affected[2]	Functional Area Lost[3]
	Year - 2				
Bog	Wb05	0.44	2.60	12	75
	Wb08	2.16			
Fen	Wf01	0.07	0.55	7	17
	Wf04	0.27			
	Wf06	0.12			
	Wf13*	0.09			
Marsh	Wm00	0.18	1.52	9	45
	Wm01	1.34			
Shallow Open Water	Ww	0.23	0.23	1	7
Swamp	Ws04	1.68	18.28	37	626
	Ws07*	12.37			
	Ws08	4.23			
Total		**23.18**	**23.18**	**66**	**770**

Notes:

** Blue-listed ecosystems (EcoLogic 2022; WMOP Appendix I, ERM 2024).*

[1] Area of direct loss (ha) is the area of direct overlap with the as-built footprint.

[2] Number of wetlands affected is a count of individual wetlands with some overlap within the as-built footprint, experiencing partial or full loss in wetland area and associated loss in wetland function for the area of direct overlap.

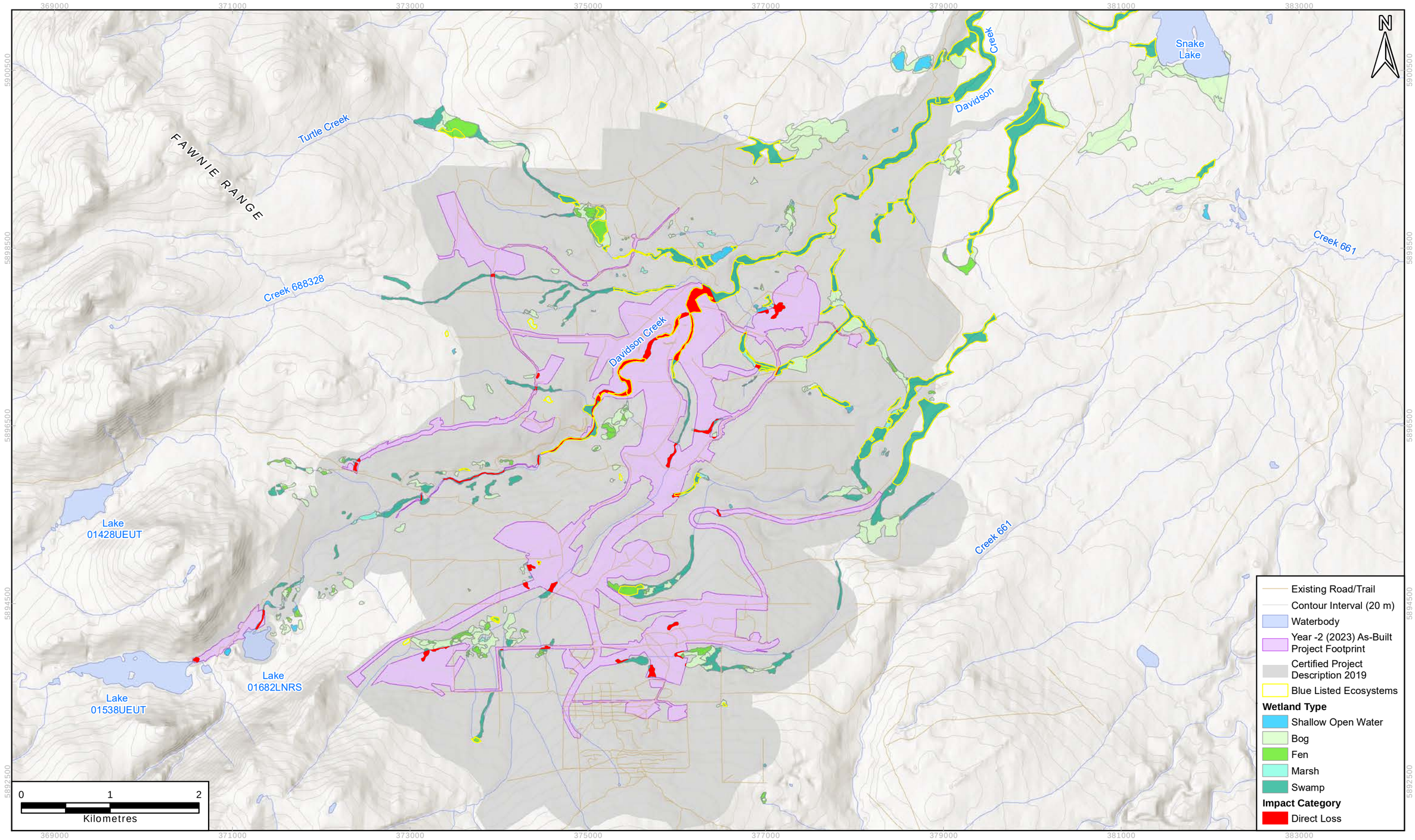
[3] Functional Area Lost is the total loss in wetland function considering both direct loss (direct overlap) and indirect loss (wetlands with high ≥50% overlap), as described in WMOP Section 7.4.1.1. Partial loss in function (degraded) for remaining wetlands in the moderate impact group are not currently included in Functional Area Lost, as these will be assessed through a commitment to monitoring (WMOP Section 10).

Table 5.2-1 provides a summary of wetland extent lost (direct overlap) and the associated direct and indirect loss of wetland function (Functional Area) for the Year -2 as-built footprint. A total of 66 individual wetlands were impacted to some degree (overlapped) by the Year -2 as-built footprint (Table 5.2-1), 31 of which are assumed to be fully lost with complete loss of wetland function (≥50% overlap; high impact) and 35 with only direct overlap considered in functional losses (moderate and low impact). Total direct area lost (ha) amounted to 23.18 ha (Table 5.2-1). Expressed in terms of wetland function lost, total Functional Area lost amounted to 770 (Table 5.2-1), considering both direct loss (direct overlap) and indirect loss (outside overlap) for wetlands in the high impact category (≥50% overlap) assumed to be fully lost. Swamps experience the largest area of direct loss (ha) and Functional Area lost, followed by bog, marsh, fen, and shallow open water (Table 5.2-1).

Two blue-listed ecosystems (Table 4.2-3) were impacted by clearing activities in year -2 (2023). No red-listed wetland site associations were observed within the mine site (EcoLogic 2022; WMOP Appendix I, ERM 2024). Clearing activities resulted in 12.37 ha of direct loss of the blue-listed swamp, Ws07 *Spruce – Common horsetail – Leafy moss*, and 0.09 ha of the blue-listed fen, Wf13 *Narrow-leaved cotton-grass- Shore Sedge.*

In fulfillment of the Decision Statement (DS) Condition 5.2, work in year -2 (2023) consisted only of activities required to construct project components. No work or activities for safety reasons occurred within the 30 m buffer of undisturbed vegetation surrounding wetlands at the mine site in year -2 (2023). Concordance with the Canadian Environmental Assessment Agency (CEAA; now Impact Assessment Agency of Canada) DS is summarized in Appendix B.

FIGURE 5.2-1 DIRECT LOSS OF WETLAND EXTENT FOR YEAR-2 WITHIN THE AS-BUILT PROJECT FOOTPRINT



ERM

CLIENT: BW Gold LTD.
GIS NUMBER: BLW-22-065e

DATE: 03/07/2024

PROJECTION: NAD 1983 UTM Zone 10N
SCALE: 1:40,000 when printed at 11x17

6. ANNUAL OFFSETTING GAINS

Since BW Gold's purchase of the Mathews Creek Ranch in 2013, grazing and livestock pressure on the land has been removed. While there are no specific features that ensure livestock have not been in this area since the purchase, the natural, passive restoration of wetland features and lack of evidence of use by livestock suggests that the procurement was successful in passively restoring aspects of the wetland complex at the Mathews Creek Ranch offsetting site. While it is evident that removal of livestock and the associated reduction in agricultural pressure has allowed the Mathews Creek Ranch wetland complex to passively recover some of its wetland functions, there are a number of specific and targeted activities that BW Gold will complete in order to fully restore the wetland complex within a reasonable timeframe (i.e., less than that of passive recovery).

No active restoration has occurred at any of the offsetting sites to date. The timing of wetland restoration at Mathews Creek Ranch will be dependent on the fish habitat compensation plan, as the two projects are linked. BW Gold will continue to work closely with Indigenous groups throughout the implementation of the offsetting measures identified in the WMOP (Section 9, ERM 2024).

7. WETLAND OFFSETTING ACCOUNTING

To track wetland offsetting accounting over the life of the mine (particularly in the Construction and early Operation phases), a ledger has been developed to compare predicted versus actual (as-built) functional area lost during the associated stages of development (Table 7-1).

TABLE 7-1: PREDICTED AND ACTUAL (AS-BUILT) LOSSES IN WETLAND FUNCTIONAL AREA BY PROJECT DEVELOPMENT OVER TIME

Project Component[1]	Wetland Class	Predicted Year -2	As-built Year -2 (2023)	Predicted Year -1	Predicted Year 01	Predicted Year 02	Predicted Year 03	Predicted Year 08	Predicted Year 13	Predicted Year 18	Predicted Year 23	Predicted Total FA Loss	As-Built Total FA Loss to Date (2023)
Fresh Water Supply System	Bog	0	0	0	0	0	0	9	0	0	0	9	0
	Fen	0	0	0	0	0	0	3	0	0	0	3	0
	Swamp	0	0	0	0	0	0	12	0	0	0	12	0
Mine Access Road	Bog	0	0	0	0	0	0	0	0	0	0	0	0
	Fen	1	0	0	0	0	0	0	0	0	0	1	0
	Swamp	14	0	4	0	0	0	0	0	0	0	14	0
Mine Site	Bog	34	75	44	31	122	9	220	87	25	24	598	75
	Fen	6	17	4	13	48	5	221	25	0	2	325	17
	Marsh	10	45	12	16	7	16	80	23	0	1	164	45
	SOW	18	7	0	2	0	0	11	21	32	3	88	7
	Swamp	337	626	113	238	8	17	881	206	36	29	1,866	626
Transmission Line (ROW Roads and Towers Only)	Bog	7	0	0	0	0	0	0	0	0	0	7	0
	Fen	12	0	0	0	0	0	0	0	0	0	12	0
	Marsh	1	0	0	0	0	0	0	0	0	0	1	0
	Swamp	46	0	0	0	0	0	0	0	0	0	50	0
FA Change:		**487**	**770**	**177**	**300**	**184**	**47**	**1,438**	**362**	**94**	**60**	**3,150**	**770**
Cumulative Loss:		**487**	**770**	**664**	**966**	**1,148**	**1,195**	**2,633**	**2,996**	**3,090**	**3,150**	**3,150**	**770**

Notes:
SOW = Shallow open water; FA = Functional Area
[1]Project Component for predicted losses assigned based on the intersecting feature within the Year 23 Full-Build Out Footprint. Where multiple project components overlap the same wetland polygon, feature attribution was assigned in order of priority as follows: Mine Access Road, Mine Site, Transmission Line. The Airstrip Access Road and Freshwater Supply Line did not have common overlaps.

8. MONITORING

As described in Section 10 of the WMOP (ERM 2024), a long-term monitoring program will be implemented to assess the potential effects of the Project on wetlands remaining within, and adjacent to, the Project Area following construction, and the predicted effects of restoration on wetland function at offsetting sites. In fulfillment of DS Condition 5.5, the follow-up effectiveness monitoring program will verify of the predictions of the EA as it pertains to the adverse environmental effects of the Project on wetland functions and determine the effectiveness of the wetland mitigation measures. This will be achieved by re-evaluating wetland function within remaining wetlands (i.e., areas outside direct overlap with Project infrastructure), particularly within the moderate impact group predicted to have partial loss (degradation) of wetland function (Section 5.1). These moderate impact wetlands will be added to the list of existing long-term monitoring sites, wherein, partial loss (degradation) of wetland function within this moderate impact group will be assessed through monitoring and recalculation of wetland function (Functional Score) within remaining wetland areas. The monitoring data will be used to adaptively manage effects (e.g., invasive plants) and update the wetland accounting and resultant offsetting ratio, as needed, further aiding in the comparison of actual effects with the EA predictions. Pursuant to DS Condition 5.4, wetland offsetting activities will be assessed and considered to be a success once a set of performance standards are achieved as described in WMOP Section 10.8 (ERM 2024). In addition to re-evaluating losses, monitoring of wetland function recovery at offsetting sites will enable assessment of the effectiveness of wetland offsetting by measuring the quantitative gain in wetland function. Baseline data, coupled with monitoring results of losses and gains associated with the Project and offsetting sites, will ensure that wetland function lost as a result of Project construction is appropriately compensated for or offset by gains in wetland function associated with offsetting sites.

9. CONCLUSION

Clearing activities conducted in Year -2 (2023) resulted in 23.18 ha of direct loss and 770 of functional area loss in all wetland classes present in the Project Area, including bogs, fens, marshes, swamps, and shallow open water. All areas of direct and indirect wetland loss were limited to the mine site footprint. Of the 23.18 ha lost as a result of clearing activities, 12.37 ha correspond to the blue-listed Ws07 *Spruce – Common horsetail – Leafy moss* and 0.09 ha of the blue-listed fen Wf13 *Narrow-leaved cotton-grass – Shore Sedge.* No red-listed wetland site associations were observed within the Mine Site. A total of 66 individual wetlands were impacted to some degree (overlapped) by the Year -2 as-built footprint, 31 of which are assumed to be fully lost and 35 with only direct overlap considered in functional losses (moderate and low impact). Total direct area lost (ha) amounted to 23.18 ha (Table 5.2-1). No work or activities for safety reasons occurred within the 30 m buffer of undisturbed vegetation surrounding wetlands at the mine site in year -2 (2023). Wetland offsetting and restoration prescriptions did not commence in Year -2 (2023) for any of the offsetting sites. Monitoring within the Project Area, offsetting sites, and reference sites will continue as detailed in Section 10 of the WMOP (ERM 2024) to assess wetland extent and function losses to be compared against the predictions in the EA.

10. REFERENCES

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APPENDIX A CONCORDANCE WITH ENVIRONMENTAL ASSESSMENT CERTIFICATE #M19-01 (JUNE 21, 2019)

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

Condition	Requirement	Location in WMOP
Condition 2 (Plan Development)	Where a condition of this Certificate requires the Holder to develop a plan, program or other document, any such plan, program or other document must, at a minimum, include the following information: a. purpose and objectives of the plan, program or other document;	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 14
	d. schedule for implementing the plan, program or other document throughout the relevant Project phases;	Section 10.6
	e. means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness;	Section 10
	f. schedules and methods for the submission of reporting to specific agencies, Aboriginal Groups and the public and the required form and content of those reports; and 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 11, Section 12
Condition 3 (Adaptive Management)	Where a condition of this Certificate requires the Holder to develop a plan, program or other document that includes monitoring, including monitoring of mitigation measures or monitoring to determine the effectiveness of the mitigation measures, the Holder must include adaptive management in that plan. The objective of the adaptive management is to address the circumstances that will require the Holder to implement alternate or additional mitigation measures to address effects of the Project if the monitoring shows that those effects: a. are not mitigated to the extent contemplated in the Application; b. are not predicted in the Application; or c. have exceeded the triggers identified in paragraph g) of this condition.	Section 11
	The adaptive management in the plan must include at least the following: d. the monitoring program that will be used including methods, location, frequency, timing and duration of the monitoring;	Section 10

Condition	Requirement	Location in WMOP
Condition 3 (Adaptive Management) *(cont'd)*	e. the baseline information that will be used, or collected where existing baseline information is insufficient, to support the monitoring program;	Section 7, Section 10.2
	f. the scope, content and frequency of reporting of the monitoring results;	Section 12
	g. the identification of qualitative and quantitative triggers, which, when observed through monitoring required under paragraph d), will require the Holder to alter existing, or develop new, mitigation measures to avoid, reduce, and/or remediate effects;	Section 8
	h. the methods that will be applied to detect when a numeric trigger, or type or level of change referred to in paragraph g), has occurred;	Section 11.1
	i. a description of the process for and timing to alter existing mitigation measures or develop new mitigation measures to reduce or avoid effects;	Section 8 Section 10
	j. identification of the new and/or altered mitigation measures that will be applied when any of the changes identified in paragraphs a) to c) occur, or the process by which those will be established and updated over the relevant timeframe for the specific condition;	N/A
	k. the monitoring program that will be used to determine if the altered or new mitigation measures and/or remediation activities are effectively mitigating or remediating the effects and or avoiding potential effects; and	Section 10
	l. the scope, content and frequency of reporting on the implementation of altered or new mitigation measures. If there are any requirements or mitigation measures required in the plan, program or other document for which adaptive management, or elements of adaptive management listed in paragraphs d) to l) are assessed to be not appropriate or applicable, the plan must include identification of those requirements and measures, and the rationale for that assessment.	Section 11

Condition	Requirement	Location in WMOP
Condition 4 (Consultation)	Where a condition of this Certificate requires the Holder consult a particular party or parties regarding the content of a plan, program or other document, the Holder must, to the satisfaction of the EAO: a. provide written notice to each such party that: i. includes a copy of the plan, program or other document; ii. invites the party to provide its views on the content of such plan, program or other document; and iii. indicates: 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; 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); 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; d. maintain a record of consultation with each such party regarding the plan, program or other document; and 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.	Section 9.1
Condition 5 (Compliance Verification and Reporting)	The Holder must provide to the EAO and to the Aboriginal Groups any document, data or information requested by the EAO for the purposes of compliance inspection and verification. The Holder must provide any document, data or information requested within the timeframe and in the manner specified by the EAO. The Holder must submit a report to the attention of the EAO and Aboriginal Groups on the status of compliance with this Certificate 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;	Section 12.2 Wetland ARR

Condition	Requirement	Location in WMOP
Condition 5 (Compliance Verification and Reporting) *(cont'd)*	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	
Condition 24 (WMOP)	The Holder must retain one or more Qualified Professionals to develop a WMOP, to offset losses of wetland functions caused by the Project, in consultation with FLNRORD, ENV, ECCC, EMPR and Aboriginal Groups. In this Condition, "wetland function" refers to the hydrological, ecological and wildlife lifecycle requirements provided by wetlands. The plan must include at least the following: a. the means by which the mitigation measures identified in the in the Mitigations Table required under Condition 43 for the valued component Wetlands will be implemented;	Section 8 Appendix P
	b. a detailed description for each wetland that would be lost or altered as a result of the Project, including: i. an assessment of each wetland and wetland function that would be lost or altered based on Wetlands of British Columbia: A Guide to Identification (Mackenzie and Moran 2004, or as updated or replaced from time to time); and ii. the location and extent of these wetlands, including in relation to the local watershed;	Section 7.2
	c. a description of the methods used to determine the functions and overall condition of wetlands;	Section 7.1 Section 7.4
	d. a description of the offsetting measures to be implemented by the Holder, including the amount and type of offsets required, the selection of offsetting sites, and a schedule and timeline for implementation of offsetting measures. The Holder is responsible for offsetting measures that compensate for expected losses of individual wetland functions described in (b);	Section 9 Section 10.6
	e. a description of how the plan applies the hierarchy of mitigation measures set out in the BC EMP;	Section 8, Appendix P (Table P-1, Table P-2)

Condition	Requirement	Location in WMOP
Condition 24 (WMOP) *(cont'd)*	f. a description of how the selection of offsets took into account the extent to which the potential offsets would also provide additional habitat for grizzly bear and moose;	Section 9
	g. a description of how input from Aboriginal Groups was considered in the identification and selection of potential locations for wetland offsets; and	Section 9.1
	h. a description of how the implementation of the offsets and mitigation measures will be monitored for effectiveness.	Section 10
	The Holder must provide the draft plan that was developed in consultation with EMPR, ENV, FLNRORD, ECCC, and Aboriginal Groups to EMPR, ENV, FLNRORD, ECCC, Aboriginal Groups, and the EAO for review a minimum of 90 days prior to the planned commencement of Construction or as listed in the Document Submission Plan required by Condition 10 of this Certificate.	Noted
	The Holder must not commence Construction until the plan has been approved by the EAO, unless otherwise authorized by the EAO.	Noted

APPENDIX B CONCORDANCE WITH CANDIAN ENVIRONMENTAL ASSESSMENT AGENCY DECISION STATEMENT (APRIL 15, 2019)

Table B-1: Federal Environmental Assessment Decision Statement Conditions and Location

Condition	Requirement	Location in WMOP
Condition 2.1 (General Conditions)	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action (including community and Indigenous traditional knowledge), are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.	Noted
Condition 2.2 (General Conditions)	The Proponent shall, when mitigation is a requirement of a condition set out in this Decision Statement, give preference to avoiding the adverse environmental effect of the Designated Project over minimizing the adverse environmental effect of the Designated Project. If unable to avoid the adverse environmental effect, the Proponent shall give preference to minimizing the adverse environmental effect of the Designated Project over compensating for the adverse environmental effect of the Designated Project. If unable to minimize the adverse environmental effect, the Proponent shall compensate for the adverse environmental effect of the Designated Project.	Section 8, Appendix P (Table P-1)
Condition 2.3 (General Conditions)	The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement: • 2.3.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation; • 2.3.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time agreed upon with the party or parties being consulted, not less than 15 days, to prepare their views and information; • 2.3.3 undertake a full and impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation; • 2.3.4 strive to reach consensus with Indigenous groups; and • 2.3.5 advise the party or parties being consulted on how the views and information received have been considered by the Proponent including a rationale for why the views have, or have not, been integrated. The Proponent shall advise the party or parties in a time period that does not exceed the period of time taken in 2.3.2.	Noted

Condition	Requirement	Location in WMOP
Condition 2.4 (Consultation)	The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, determine and strive to reach consensus with each Indigenous group regarding the manner by which to satisfy the consultation requirements referred to in condition 2.3, including: • 2.4.1 the methods of notification; • 2.4.2 the type of information and the period of time to be provided when seeking input; • 2.4.3 the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation; and • 2.4.4. the period of time and the means by which to advise Indigenous groups of how their views and information were considered by the Proponent.	Noted
Condition 2.5 (Follow-up and Adaptive Management)	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, have a Qualified Professional, where such a qualification exists for the subject matter of the follow-up program, determine, as part of the development of each follow-up program and in consultation with the party or parties being consulted during the development, the following information: • 2.5.1 the follow-up activities that must be undertaken by a qualified individual; • 2.5.2 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program; • 2.5.3 the scope, content, format and frequency of reporting of the results of the follow-up program; • 2.5.4 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and • 2.5.5 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.5.4 have been reached or exceeded.	Section 10.7
Condition 2.6 (Follow-up and Adaptive Management)	The Proponent shall update and maintain the follow-up and adaptive management information referred to in condition 2.5 during the implementation of each follow-up program in consultation with the party or parties being consulted during the development of each follow-up program.	Section 11 Section 12
Condition 2.7 (Follow-up and Adaptive Management)	The Proponent shall provide a draft of the follow-up programs referred to in conditions 3.14, 3.15, 3.16, 4.5, 5.5, 6.11, 6.12, 6.13, 6.14, 8.18.6, 8.20.5, 8.21, and 8.22, if required, to the party or parties being consulted during the development of each follow-up program for a consultation period of up to 60 days prior to providing follow-up programs pursuant to condition 2.8.	BW Gold will provide the WMOP to Indigenous groups

Condition	Requirement	Location in WMOP
Condition 2.8 (Follow-up and Adaptive Management)	The Proponent shall provide the follow-up programs referred to in conditions 3.14, 3.15, 3.16, 4.5, 5.5, 6.11, 6.12, 6.13, 6.14, 8.18.6, 8.20.5, 8.21, and 8.22, if required, to the Agency and to the party or parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update(s) made pursuant to condition 2.6 to the Agency and to the party or parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.	Section 12
Condition 2.9 (Follow-up and Adaptive Management)	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement: • 2.9.1 conduct the follow-up program according to the information determined pursuant to condition 2.5; • 2.9.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s); • 2.9.3 determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken in accordance with condition 2.9.2; and • 2.9.4 if modified or additional mitigation measures are required pursuant to condition 2.9.3, develop and implement these mitigation measures in a timely manner and monitor them in accordance with condition 2.9.2.	Section 10 Section 12
Condition 2.10 (Follow-up and Adaptive Management)	Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss the follow-up program with Indigenous groups and determine, in consultation with Indigenous groups, opportunities for their participation in the implementation of the follow-up program, including the analysis of the follow-up results and whether modified or additional mitigation measures are required, as set out in condition 2.9.	Section 9.1 Section 10
Condition 2.11 (Annual Reporting)	The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out: • 2.11.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement; • 2.11.2 how the Proponent complied with condition 2.1; • 2.11.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation, including a rationale for how the views have, or have not, been integrated; • 2.11.4 the information referred to in conditions 2.5 and 2.6 for each follow-up program; • 2.11.5 the results of the follow-up program requirements identified in conditions 3.14, 3.15, 3.16, 4.5, 5.5, 6.11, 6.12, 6.13, 6.14, 8.18.6, 8.20.5, 8.21, and 8.22 if required;	Section 12, Wetland Annual Report

Condition	Requirement	Location in WMOP
	• 2.11.4 any update made to any follow-up program in the reporting year; • 2.11.7 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.9 and rationale for why mitigation measures were selected pursuant to condition 2.5.4; and • 2.11.8 any change(s) to the Designated Project in the reporting year.	
Condition 2.12 (Annual Reporting)	The Proponent shall provide a draft annual report referred to in condition 2.11 to Indigenous groups, no later than June 30 following the reporting year to which the annual report applies. The Proponent shall consult Indigenous groups on the content and findings in the draft annual report.	Section 12.2, Wetland Annual Report
Condition 2.13 (Annual Reporting)	The Proponent, in consideration of any comments received from Indigenous groups pursuant to condition 2.12 shall revise and submit to the Agency and Indigenous groups a final annual report, including an executive summary in both official languages, no later than September 30 following the reporting year to which the annual report applies.	Section 12, Wetland Annual Report
Condition 2.14 (Information Sharing)	The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.11 and 2.13, the offsetting plan(s) referred to in condition 3.11, the compensation plan referred to in condition 8.18 and, if required, condition 5.3, the whitebark pine management plan referred to in condition 8.20, the communication plans referred to in conditions 6.15 and 10.5, the reports related to accidents and malfunctions referred to in conditions 10.4.2 and 10.4.3, the schedules referred to in conditions 11.1 and 11.2, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of decommissioning of the Designated Project. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.	Section 12.2, Wetland Annual Report
Condition 5.1 (Wetlands)	The Proponent shall mitigate the adverse environmental effects of the Designated Project on wetland functions with a preference for avoiding the loss of wetlands and wetland functions over minimizing the adverse effects on wetlands, and for minimizing the adverse effects on wetlands over compensating for lost or adversely affected wetlands, taking into account British Columbia's *Wetland Ways: Interim Guidelines for Wetland Protection and Conservation in British Columbia, and Riparian Management Area Guidebook*.	Section 8

Condition	Requirement	Location in WMOP
Condition 5.2 (Wetlands)	The Proponent shall maintain, during construction and operation, a 30-metre buffer of undisturbed vegetation around wetlands located within the Mine Site, excluding activities required to construct project components. The Proponent shall conduct work or activity within the 30-metre buffer only to the extent necessary for safety reasons, to control invasive plants, or to install and maintain erosion or sediment runoff control measures. The Proponent shall have an independent environmental monitor observe work being done within the buffer, except when not possible for safety reasons. As part of the annual report, the Proponent shall include a summary of work or activities conducted for safety reasons within the 30-metre buffer.	Appendix E, Section 5.2.1 of the Wetland Annual Report
Condition 5.3 (Wetlands)	The Proponent shall, for adverse environmental effects from the Designated Project on wetlands that cannot be avoided or minimized pursuant to condition 5.1, set out mitigation measures in a wetland compensation plan. The Proponent shall develop the wetland compensation plan, prior to construction, in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, and taking into account Canada's Federal Policy on Wetland Conservation, Environment and Climate Change Canada's *Operational Framework for Use of Conservation Allowances* and habitat needs for migratory birds, moose (*Alces alces*) and listed species at risk. When identifying mitigation measures, the Proponent shall select wetland restoration over enhancement and wetland enhancement over wetland creation. The Proponent shall start the implementation of the wetland compensation plan prior to the wetlands being adversely affected.	Section 8 Section 9
Condition 5.4 (Wetlands)	For any wetland creation required pursuant to condition 5.3, the Proponent shall establish, prior to wetland creation and in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, performance standards for wetland functions.	Section 9 Section 10.7
Condition 5.5 (Wetlands)	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Environment and Climate Change Canada and other relevant authorities, a follow-up program to verify the predictions of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on wetland functions and to define the effectiveness of the mitigation measures as it pertain to wetlands. The Proponent shall implement the follow-up program during from construction through decommissioning and shall apply conditions 2.9 and 2.10 when implementing the follow-up program. As part of the follow-up program, the Proponent shall:	Section 10.7
Condition 5.5.1 (Wetlands)	• conduct pre-construction surveys within the Mine Site to confirm the absence of red or blue-listed wetlands. The Proponent shall provide the results of the survey to the Agency and to Indigenous groups prior to the start of construction. If the results of the survey demonstrate the presence of red or blue-listed wetlands within the Mine Site, the Proponent shall develop, prior to construction, and implement additional mitigation measures;	Section 7.2

Condition	Requirement	Location in WMOP
Condition 5.5.2 (Wetlands)	• monitor changes to wetland functions of wetlands located within the Mine Site and remaining after vegetation clearing required to construct project components during all phases of the Designated Project; and	Section 10
Condition 5.5.3 (Wetlands)	• monitor all compensatory wetland sites at a minimum annually, to ensure they meet or exceed performance standards for wetland functions established pursuant to condition 5.4 from the start of compensation until wetland functions are attained.	Section 10
Condition 12.1	• The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency throughout construction and operation and for 25 years following the end of decommissioning of the Designated Project. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.	Section 12.1
Condition 12.2	• The Proponent shall retain all records referred to in condition 12.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.	Section 12.1