KEMESS MINE 2025 ANNUAL IAAC REPORT

Canadian Environmental Assessment Act, 2012

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EXECUTIVE SUMMARY

AuRico Metals Inc. (AuRico), a wholly own subsidiary of Centerra Gold Inc., obtained the Canadian Environmental Minister's Decision Statement on March 13, 2017, for the Kemess Underground Mine (KUG), an underground mine located in the mountains of north-central British Columbia (BC), 430 kilometres (km) northwest of Prince George, BC. The Implementation Schedule was provided to Indigenous groups and the Impact Assessment Agency of Canada (IAAC; the Agency) in 2017. Construction activities (road building, clearing, etc.) for the Kemess Underground Project Commenced July 16, 2018. In 2020, construction of the KUG project was paused and Kemess Mine was put into care and maintenance. Please refer to Appendix A for the updated Implementation Schedule.

In 2025, AuRico continued to implement mitigation measures and monitoring programs in accordance with the Decision Statement. No instream works were conducted within the KUG Project footprint during the reporting period; however, limited watercourse crossing installations associated with Kemess North Exploration activities were completed in accordance with applicable mitigation measures and regulatory requirements. No acid-generating or potentially acid-generating materials were produced or managed during the reporting period. Water management remained consistent with previous years, with all contact water directed to the KUG Tailings Storage Facility (TSF) or managed through sediment control features prior to discharge.

Discharge from the TSF to Attichika Creek occurred during open water conditions from late May to late October 2025. Monitoring conducted under the Fish and Aquatic Effects Monitoring Plan (FAEMP) and Environmental Management Act Permit PE 15335 indicated that water quality remained within applicable guidelines and historical ranges for most parameters. Minor increases in select constituents downstream of the diffuser were within expected ranges and were not associated with adverse biological effects. Monitoring results confirm that mine-related effects remain minor and largely restricted to near-field areas.

Selenium concentrations in Waste Rock Creek remained elevated above provincial guidelines but continue to show improving trends as a result of mitigation and water management measures. Monitoring results indicate no substantive effects on benthic or periphyton communities. Fish monitoring confirmed stable or improved conditions, with above-average bull trout redd counts and juvenile densities, and no evidence of spawning habitat loss. Fish tissue results indicate no mine-related increase in contaminant bioaccumulation, and observed mercury concentrations remain consistent with regional background conditions.

The Wildlife Management and Monitoring Plan (WMMP) was implemented through employee observations, camera monitoring, and targeted surveys. No vegetation clearing occurred within the KUG Project footprint, no wildlife mortalities were attributed to mine-related activities, and no use of the TSF or seepage ponds by migratory birds was observed. Bi-weekly monitoring of bat roosting structures identified no bat presence, and no bat-specific mitigation measures or buffer zones have been required.

Engagement with Indigenous groups continued throughout 2025 in accordance with Decision Statement requirements, including Environmental Management Committee meetings, collaboration on management plans, and participation in monitoring programs. Indigenous input was incorporated into environmental management and decision-making processes.

All activities were carried out in a careful and precautionary manner using qualified professionals and best available information. Follow-up programs were implemented in accordance with approved plans, including defined methodologies and monitoring requirements, and adaptive management measures were applied where required to address site-specific conditions.

The Independent Environmental Monitor completed two desktop inspections in 2025, and no Stop Work Orders were issued.

Overall, monitoring results demonstrate that mitigation measures remain effective, environmental conditions are stable, and the Project continues to meet the requirements of the Decision Statement while in care and maintenance.

RÉSUMÉ

AuRico Metals Inc. (AuRico), une filiale en propriété exclusive de Centerra Gold Inc., a obtenu la Déclaration de Décision des Ministres de l'Environnement du Canada le 13 mars 2017 pour la mine souterraine de Kemess (KUG), une mine souterraine située dans les montagnes du centre-nord de la Colombie-Britannique (CB), à 430 kilomètres (km) au nord-ouest de Prince George, CB. Le calendrier de mise en œuvre a été transmis aux groupes autochtones et à l'Agence d'évaluation d'impact du Canada (AEIC) en 2017. Les activités de construction (construction de routes, déblayage, etc.) pour le projet Kemess Underground ont commencé le 16 juillet 2018. En 2020, la construction du projet KUG a été interrompue et la mine de Kemess a été mise en phase d'entretien et en maintenance.

En 2025, AuRico a poursuivi la mise en œuvre des mesures d'atténuation et des programmes de suivi conformément à la Déclaration de décision. Aucun travail en cours d'eau n'a été réalisé dans l'empreinte du projet KUG durant la période visée; toutefois, des installations limitées de traversées de cours d'eau associées aux activités d'exploration de Kemess North ont été réalisées conformément aux mesures d'atténuation et aux exigences réglementaires applicables. Aucun matériau potentiellement générateur d'acide ou générateur d'acide n'a été produit ni géré durant la période de référence. La gestion de l'eau est demeurée conforme aux années précédentes, toutes les eaux de contact étant dirigées vers l'installation de stockage des résidus (TSF) de KUG ou gérées au moyen de structures de contrôle des sédiments avant leur rejet.

Le rejet à partir du TSF vers le ruisseau Attichika a eu lieu durant la période d'eaux libres, de la fin mai à la fin octobre 2025. Le suivi effectué dans le cadre du Plan de surveillance des effets sur les poissons et les milieux aquatiques (FAEMP) et du permis PE 15335 de l'Environmental Management Act a démontré que la qualité de l'eau demeurait conforme aux lignes directrices applicables et aux plages historiques pour la plupart des paramètres. De légères augmentations de certains paramètres en aval du diffuseur ont été observées, mais celles-ci sont demeurées dans les plages attendues et n'ont pas été associées à des effets biologiques négatifs. Les résultats confirment que les effets liés au projet demeurent mineurs et principalement limités aux zones proches.

Les concentrations de sélénium dans le ruisseau Waste Rock sont demeurées supérieures aux lignes directrices provinciales, mais continuent de montrer une tendance à la baisse grâce aux mesures d'atténuation et de gestion de l'eau mises en œuvre sur le site. Les résultats indiquent qu'il n'y a pas d'effets significatifs sur les communautés benthiques ou de périphyton. Le suivi des poissons a confirmé des conditions stables ou améliorées, avec des densités de juvéniles et des dénombrements de frayères d'omble à tête plate supérieurs à la moyenne à long terme, sans perte d'habitat de fraie observée. Les résultats des tissus de poissons indiquent l'absence d'augmentation liée au projet de la bioaccumulation des contaminants, et les concentrations de

mercure observées demeurent conformes aux conditions de fond régionales.

Le Plan de gestion et de suivi de la faune (WMMP) a été mis en œuvre au moyen d'observations des employés, de caméras et de relevés ciblés. Aucun déboisement n'a été réalisé dans l'empreinte du projet KUG, aucune mortalité faunique n'a été attribuée aux activités minières et aucune utilisation du TSF ou des bassins de suintement par des oiseaux migrateurs n'a été observée. Le suivi bihebdomadaire des structures de repos pour les chauves-souris n'a révélé aucune présence, et aucune mesure d'atténuation ou zone tampon spécifique aux chauves-souris n'a été requise.

La consultation et l'engagement avec les groupes autochtones se sont poursuivis tout au long de 2025 conformément aux exigences de la Déclaration de décision, notamment par l'entremise de réunions du Comité de gestion environnementale (EMC), de la collaboration sur les plans de gestion et de la participation aux programmes de suivi. Les commentaires et connaissances autochtones ont été intégrés aux processus de gestion environnementale et de prise de décision.

Toutes les activités ont été réalisées de manière prudente et préventive, en s'appuyant sur les meilleures informations disponibles et sur des professionnels qualifiés. Les programmes de suivi ont été mis en œuvre conformément aux plans approuvés, incluant les méthodologies et exigences de surveillance définies, et des mesures de gestion adaptative ont été appliquées au besoin afin de répondre aux conditions propres au site.

Le surveillant environnemental indépendant a réalisé deux inspections documentaires en 2025, et aucun ordre d'arrêt des travaux n'a été émis.

Dans l'ensemble, les résultats de suivi démontrent que les mesures d'atténuation demeurent efficaces, que les conditions environnementales sont stables et que le projet continue de respecter les exigences de la Déclaration de décision durant la phase de soins et maintenance.

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1. Introduction

AuRico Metals Inc. (AuRico) is a wholly owned subsidiary of Centerra Gold Inc., which operates the Kemess Project. The Kemess Mine is located in north-central British Columbia (BC), 430 kilometres (km) northwest of Prince George, BC in the Peace River Regional District. The closest communities to the Project by air are Kwadacha (also known as Fort Ware; 79 km), Tsay Keh Dene (111 km), and Takla Landing (182 km). The Kemess South (KS) complex consists of a previously operated open pit mine, processing mill and various ancillary support facilities, including maintenance shops and housing for 400 full-time employees during operations. The KS mine ceased operations in 2011 and entered a state of care and maintenance. The Kemess Underground (KUG) Project is an approved but yet to be constructed 37,500 tonne per day copper and gold mine with a 17-year mine life. The KUG Project is designed to utilize the existing KS facilities, as well as newly constructed infrastructure. Initial surface construction activities for KUG began on July 16, 2018. In 2020, construction the KUG project was paused and Kemess Mine was put into care and maintenance. In 2022, the BC Environmental Assessment Office (EAO) granted the project substantially started status. This determination preserves the Provincial Environmental Assessment Certificate (EAC) for the life of mine while the site remains in care and maintenance.

AuRico received both a BC EAC (#M17-01) and a Canadian Environmental Minister's Decision Statement (Decision Statement) on March 9, 2017. An amended Decision Statement was issued on January 26, 2021. All provincial and federal authorizations required to construct KUG have been received.

This report has been developed to meet Decision Statement Condition 2.9: "*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".* The report is laid out such that each section addresses an annual reporting requirement defined within the sub-sections of Condition 2.9. Namely for Condition 2.9.3, the report identifies conditions which required consultation and how the Proponent (AuRico) has considered the views and information received as per the requirements set out in Condition 2.2.

Decision Statement Conditions are presented verbatim throughout this report and are shown in grey, italicized font to assist the reader.

2. General Conditions

2.1 The Proponent shall ensure that its actions in meeting the conditions set out in the Decision Statement 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 achievable technologies.

The following sections identify the Decision Statement conditions that required consultation and how the Proponent has considered the views and information received as per the requirements set out in Conditions 2.2 to 2.14.

2.2 The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:

> *2.2.1 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;*
>
> *2.2.2 provide sufficient information on the scope and the subject matter of the consultation and a reasonable period of time to permit the party or parties being consulted to prepare their views and information;*
>
> *2.2.3 provide a full and impartial consideration of any views and information presented by the party or parties being consulted on the subject matter of the consultation; and*
>
> *2.2.4 advise in a timely manner the party or parties being consulted on how their views and information have been considered by the Proponent.*

2.3. The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner by which to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to be provided when seeking input, the process for full and impartial consideration of any views and information presented on the subject of the consultation, and the means by which Indigenous groups will be informed of how their views and information have been considered by the Proponent.

2.4. The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of the follow-up program and in consultation with Indigenous groups and relevant authorities, the following information, for each follow-up program:

> *2.4.1. the methodology, location, frequency, timing, and duration of monitoring associated with the follow-up program as well as the scope, content, and frequency of reporting of the follow-up results;*
>
> *2.4.2. the levels of environmental change relative to established baseline conditions*

that would require the Proponent to implement additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and

2.4.3. the range of 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 2.4.2 have been reached or exceeded.

2.5. The Proponent shall submit the information referred to in condition 2.4 to the Agency prior to the implementation of a follow-up program. The Proponent shall update that information in consultation with Indigenous groups and relevant authorities during the implementation of the follow-up program, and shall provide the updated information to the Agency, Indigenous groups, and relevant authorities within 30 days of the information being updated.

2.6. The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:

2.6.1. conduct the follow-up program according to the information determined pursuant to condition 2.4;

2.6.2. 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);

2.6.3. determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.6.2; and

2.6.4. if modified or additional mitigation measures are required pursuant to condition 2.6.3, develop and implement the modified or additional mitigation measures in a timely manner and monitor them pursuant to condition 2.6.2.

2.7. Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for the participation of that Indigenous group 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 2.6.

2.8. The Proponent shall follow the consultation process outlined in conditions 2.3, 2.4, 2.5, and 2.7 when consulting Gitxsan Wilp Nii Kyap for the purpose of conditions 3.7 and 9.5.

2.9. 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:

2.9.1. the activities undertaken in the reporting year to comply with each of the conditions set out in this Decision Statement;

2.9.2 how the Proponent complied with condition 2.1;

2.9.3. 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;

2.9.4. the information referred to in conditions 2.4 and 2.5 for each follow-up program;

2.9.5. the results of the follow-up program requirements identified in conditions 3.7, 4.3, 5.1, 6.10, and 6.11; and

2.9.6. any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.6.

2.10. The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including an executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.

2.11. The Proponent shall publish on the Internet, or any medium which is widely publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10, the reports related to accidents and malfunctions referred to in conditions 9.4.3 and 9.4.4, the communication plan referred to in condition 9.5, the implementation schedule referred to in condition 10.1, 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 throughout construction and operation and until the end of decommissioning. The Proponent shall notify the Agency, Indigenous groups, and Gitxsan Wilp Nii Kyap of the availability of these documents upon publication.

2.12. The Proponent shall notify the Agency and Indigenous groups in writing no later than 60 days after the day on which there is a transfer of ownership, care, control, or management of the Designated Project in whole or in part.

2.13. The Proponent shall consult with Indigenous groups prior to initiating any material change(s) to the Designated Project that may result in adverse environmental effects, and shall notify the Agency in writing no later than 60 days prior to initiating the change(s).

2.14. In notifying the Agency pursuant to condition 2.13, the Proponent shall provide the Agency with a description of the potential adverse environmental effects of the change(s) to the Designated Project, the measures proposed to be implemented by the Proponent to mitigate adverse environmental effects, and the results of the consultation with Indigenous groups.

AuRico and the Tsay Keh Dene, Kwadacha, and Takla Lake First Nations have a collaboration framework for the project espoused within the 2017 Impact Benefit Agreement (IBA). In 2025, consultation and engagement activities included, but were not limited to, meetings with the Environmental Management Committee (EMC), sharing of all external reports and project

management plans, collaboration on non-compliances, consultation in updating management plans, facilitating third party technical reviews for relevant plans and documents, retaining Environmental Monitors from the Nations to work on site, and publishing an annual newsletter. There were four quarterly meetings with the EMC, including a full-day in-person meeting hosted by AuRico in the third quarter (Q3) - September 2025. The EMC also held a meeting on the topic of next steps towards developing a Selenium Site Performance Objective (SPO) as required upon rejection of the Science Based Environmental Benchmar (SBEB) and PE-15335. The Tsay Keh Dene, Takla and Kwadacha EMC were extensively engaged in updating Kemess's Fish and Aquatic Effects Monitoring Plan (FAEMP; Condition 3.7), as well as the Selenium Management Plan (SeMP) and the Nitrate Management Plan (NMP), which are all requirements of Kemess's *Environmental Management Act* (EMA) Effluent Permit (PE 15335) and that support aquatic and water quality mitigation under the Decision Statement.

In 2023, AuRico signed a relationship agreement with the Gitxsan Wilp Nii Gyap First Nation. AuRico has established an Environmental Working Group with Nii Gyap and held one meeting in 2025. A Gitxsan Environmental Monitor has been retained onsite per the relationship agreement. This framework will facilitate collaboration on Project activities and environmental matters. AuRico updated the FAEMP in 2024-2025 in consultation with Nii Gyap, which pertains to Condition 3.7 of this Decision Statement.

3. Condition 3: Fish and Fish Habitat

3.1. Condition 3.1

The Proponent shall implement erosion and sedimentation control measures within the Project area during all phases of the Designated Project to avoid the deposit of deleterious substances in waters frequented by fish.

As per Kemess's Erosion Prevention and Sediment Control Plan, erosion and sediment control (ESC) techniques were implemented as part of KUG care and maintenance activities in 2025. At the KS Tailings Storage Facility (TSF), ESC measures including silt fences, road drainage bars, and check dams were used to mitigate erosion triggered by rain events. In 2025, erosion and sediment control activities focused on stabilizing disturbed areas and promoting vegetation establishment. Hydroseeding was completed along the diffuser road after re-sloping of the bank, as well as along the SP-27 ditch constructed in 2023. The OB1 Stockpile was roughened and loosened to improve surface stability and seedbed conditions. The slope adjacent to the Dam was also roughened and loosened and subsequently hydroseeded to enhance erosion control and vegetation establishment. In addition, a ditch located behind the BXL ponds was re-sloped and hydroseeded to support long-term stability and, erosion and sediment control objectives. Elsewhere, routine maintenance on roads, the airstrip and other surfaces continued as needed to protect against erosion and subsidence. All water that reports to the Mine Site Water Management Area (MSWMA) is either pumped to the KUG TSF or flows to sediment settling features (i.e., settling ponds, check-dams) prior to release into the receiving environment; data can be found in the 2025 Annual Environmental report.

Settling ponds were successful in reducing sediment transport within the MSWMA, verified by in-situ turbidity measurements at discharge points and routine samples for total suspended solids. Results can be found in the 2025 Annual Environmental Report.

3.2. Condition 3.2

The Proponent shall, taking into consideration Fisheries and Oceans Canada's Measures to Avoid Causing Harm to Fish and Fish Habitat Including Aquatic Species at Risk, implement mitigation measures when conducting Designated Project activities to avoid causing harm to fish and fish habitat, including timing work in or around water to respect the timing windows identified to protect fish.

During the 2025 crossing installation activities at the Kemess North Exploration Site, mitigation measures consistent with Fisheries and Oceans Canada (DFO)'s *Measures to Avoid Causing Harm to Fish and Fish Habitat Including Aquatic Species at Risk* were implemented to ensure no harm to fish or fish habitat occurred.

The three crossings (Kitchen Creek, Nugget Creek, and KN003) were assessed and installed under the supervision of a Qualified Environmental Professional (QEP), who confirmed that the works were located on non-fish-bearing reaches or non-classified drainages with no fish habitat present. Appropriately sized culverts were installed to maintain natural flow conditions, and work areas were isolated and dewatered prior to excavation to minimize sediment release. Riprap

armouring was placed at culvert inlets and outlets to reduce erosion risk, equipment was inspected to prevent contamination, and biodegradable hydraulic fluids were used where applicable. Disturbed areas were stabilized and restored following installation, and temporary crossings were removed at the end of the exploration season to re-establish natural channel flow.

The report, along with additional details can be found in Appendix C: *Kemess Crossing Report 2025_Final.*

3.3. Condition 3.3

The Proponent shall comply with the Metal Mining Effluent Regulations and subsection 36(3) of the Fisheries Act regarding the deposit of effluent from the Designated Project in water frequented by fish, taking into account the Canadian Council of Ministers of the Environment's Water Quality Guidelines for the Protection of Aquatic Life, from the start of construction to the end of decommissioning. In doing so, the Proponent shall:

> *3.3.1 place all acid-generating and potentially acid-generating material into the tailings storage facility and submerge all such materials placed in the tailings storage facility under a permanent water cover; and*

During construction activities at the Kemess Mine in 2018, all acid-generating and potentially acid-generating material was deposited into the KUG TSF under a permanent water cover. In 2025, there was no production, movement, or disturbance of any acid-generating or potentially acid-generating material.

> *3.3.2 collect and treat all waters affected by the Designated Project that do not meet the requirements of the Metal Mining Effluent Regulations and subsection 36(3) of the Fisheries Act, as applicable, prior to the affected waters being deposited in waters frequented by fish.*

The site currently holds recognized closed mine status following the completion of Environmental Effects Monitoring programs for Kemess South in 2018, and as such, is not subject to Metal and Diamond Mining Effluent Regulation (MDMER) requirements. Water quality sampling will take place as per the MDMER and the *Fisheries Act,* when production throughput re-triggers that requirement, and will be conducted in accordance with the Canadian Council of Ministers of the Environment's (CCME) Water Quality Guidelines for the Protection of Aquatic Life.

In addition to *Fisheries Act* requirements, Kemess is subject to the EMA for all discharges from the mine site (reported under separate cover in the annual effluent report). Water quality sampling and toxicity testing occurs in accordance with these requirements to ensure that the environment is protected. AuRico adheres to its Mine Site Water Management Plan (MSWMP) and SeMP to direct water management activities in accordance with industry best practices. The site uses a combination of source control, contact water capture, clean water diversions, and where necessary, water treatment to ensure water is discharged in compliance with all applicable limits.

In 2025, all the water collected by the Southern Collection System Pond (SCSP) was pumped to

the KUG TSF for containment.

3.4. Condition 3.4

The Proponent shall install hydraulic plugs in the declines before the underground mine is flooded to direct seepage from the flooded underground mine towards East Cirque Creek.

Construction of the underground mine has not started, and hydraulic plugs will be implemented at the time of flooding.

3.5. Condition 3.5

The Proponent shall, in a manner that complies with the Metal Mining Effluent Regulations and subsection 36(3) of the Fisheries Act, discharge water from the tailings storage facility into Attichika Creek during construction and the first year of operation such that flow rates downstream of the discharge location are within the range of minimum and maximum flow rates naturally occurring in Attichika Creek, and shall only discharge water into Attichika Creek during open water months.

Discharge into Attichika Creek in 2025 from the KUG TSF occurred in accordance with the limits and dilution ratios stipulated in Kemess's EMA PE 15335 to protect aquatic life. Discharge only occurred during open water months. In 2025, discharge from the KUG TSF was re-initiated to Attichika Creek, which occurred from May 25 to October 28. . Hydrometric monitoring in Attichika Creek was conducted continuously to confirm that KUG TSF discharge did not substantially alter flow from ambient conditions in Attichika Creek. KUG TSF discharge was reduced accordingly to comply with this requirement. Complete information is contained in the EMA PE 15335 Annual Environmental Report.

3.6. Condition 3.6

The Proponent shall divert all runoff from the East Pit quarry into the Kemess Underground tailings storage facility during construction and operation.

Runoff from the East Pit Quarry reports directly into the KUG TSF via existing drainage ditches. Most flow is captured by gravity, and the rest is collected in a ditch that reports to Dump Pond 1, which is then pumped to the KUG TSF. No additional measures or works were implemented in 2025. Monitoring of the drainage pattern from the East Pit Quarry will continue through the construction and operations phases of the mine life in accordance with the Mine Site Water Management Plan.

3.7. Condition 3.7

The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities, and implement, from the start of construction to the end of decommissioning, a follow-up program to verify the accuracy of the environmental assessment as it pertains to fish and fish habitat and to determine the effectiveness of mitigation measures referred to in conditions 3.1 to 3.6.

AuRico submitted its KUG EMA and Mines Act permit application to the Major Mines Office (MMO) on August 31, 2017. Prior to the official permit application submission, AuRico consulted with Tsay Keh Dene, Takla and Kwadacha on the development of a FAEMP, a Wildlife Management and Monitoring Plan (WMMP), and a MSWMP; circulating draft copies of these plans on June 30, 2017, which was 60 days in advance of the official permit application submission. These plans were developed in consideration of Condition 3.7 of the Decision Statement. AuRico and Tsay Keh Dene, Takla and Kwadacha continued to consult on management plans throughout the permitting process and established collaboration and consultation methods espoused within the 2017 IBA.

During the permitting process, Tsay Keh Dene, Takla and Kwadacha, via their consultants at Environment Dynamics Incorporated (EDI), provided feedback on fish and fish habitat. Tsay Keh Dene, Takla and Kwadacha comments focused on the SeMP, which outlines selenium monitoring, as well as mitigation measures for capturing flows with elevated selenium and addressing potential flow reduction in Waste Rock Creek.

Aquatics monitoring occurs annually in Waste Rock Creek, Attichika Creek, and Kemess Creek in accordance with the Fish and Aquatic Effects Monitoring Plan (FAEMP), as required by the Environmental Assessment Certificate. In 2024, as per instruction from the BC Ministry of Environment and Parks (ENV), AuRico finalized updates to the FAEMP, SeMP and the NMP in collaboration with the Tsay Keh Dene, Takla and Kwadacha EMC and the Nii Kyap Environmental Working Group. On January 9, 2025, the revised plan was also distributed to the Impact Assessment Agency of Canada (IAAC; the Agency) and DFO, as it is intended to satisfy Condition 3.7 of the Decision Statement. The FAEMP was subsequently approved by the EAO on August 13, 2025, and distributed accordingly. The SeMP was also revised, approved, and distributed on June 26, 2025. In addition, the NMP was updated and submitted for approval on July 10 2025. Additional information was required and submitted on December 15, 2025, with approval of the NMP anticipated in 2026.

As part of the follow-up program, the Proponent shall:

> *3.7.1 monitor quality of water discharged in Attichika Creek during the dewatering of the Kemess South Pit and treat that water to meet the requirements of subsection 36(3) of the Fisheries Act;*

In 2025, discharge from the KUG TSF to Attichika Creek occurred between May 26 and October 28. Water quality monitoring was conducted in accordance with the Fish and Aquatic Effects Monitoring Program (FAEMP) and Environmental Management Act Permit PE 15335 requirements. Monitoring included routine effluent sampling, receiving environment water quality monitoring, and supporting biological indicators (i.e., periphyton, benthic invertebrates, and fish).

Results from the 2025 FAEMP indicate that effluent and receiving environment water quality remained within applicable guidelines and historical ranges for most parameters, with no evidence of substantive changes to environmental quality in Attichika Creek. While some increases in select constituents (e.g., copper and selenium) continue to be observed downstream of the discharge, these changes were modest, within expected ranges, and not associated with adverse effects to aquatic biological receptors. Biological monitoring results demonstrated no statistically significant differences between background and exposure stations for periphyton or benthic invertebrate communities in 2025, and no evidence of increased selenium bioaccumulation in the aquatic food web.

Overall, the 2025 monitoring results confirm that mine-related effects remain minor and largely restricted to near-field areas, with conditions in the aquatic environment remaining stable. These results demonstrate that water discharged to Attichika Creek in 2025 was effectively managed and treated to meet applicable regulatory requirements, including subsection 36(3) of the *Fisheries Act*.

3.7.2 monitor surface water quality in Amazay Lake and groundwater movement between the subsidence zone identified by the Proponent during the environmental assessment and Amazay Lake;

The Amazay Lake Monitoring Plan is a subset of the FAEMP. It will be triggered by the restart of construction, which will include the requirement to monitor surface water quality and groundwater quantity entering the lake through operations and closure, as detailed in the MSWMP. Given the unlikely, but potential impact to fish and aquatic biota, Amazay Lake water quality data would be used to trigger an Adaptive Management Monitoring Program as required. A baseline characterization of Amazay Lake and Amazay Creek was conducted in September 2019. Beyond the initial baseline monitoring, this Amazay Lake biological monitoring program will only be implemented when routine water quality monitoring from the Amazay Lake Monitoring Plan initiates a trigger response. This biological monitoring program will then occur annually in the fall until results-based rationale to discontinue the program are available and accepted by regulators. The monitoring program consists of benthic invertebrates, fish tissue analysis (using resident rainbow trout, given they are more abundant than Dolly Varden and mountain whitefish in the lake), and supporting water quality and sediment quality results.

3.7.3 monitor changes in channel form and sediment load downstream of the discharge location in Attichika Creek;

Sediment quality samples and substrate characterization for channel form are conducted annually

in Attichika Creek as part of the FAEMP and results can be found in the Annual FAEMP report. Fish monitoring in Attichika Creek has shown that there is no direct evidence that juvenile fish were avoiding habitats within a short distance downstream from the active diffuser. These results can be found in the 2025 Kemess Mine Fish Monitoring Studies.

> *3.7.4 monitor changes in water quality in Waste Rock Creek and the tailings storage facility, including changes in selenium concentrations;*

Routine monitoring prescribed by PE 15335, and annual aquatics monitoring prescribed by the SeMP are designed to evaluate environmental effects downstream of the legacy KS Waste Rock Storage Facility. Water-borne selenium concentrations in Waste Rock Creek during winter months remain elevated above background levels at most stations downstream of the KS Waste Rock Storage Facility, although are greatly improved since operations years, as a result of mitigation actions employed by the mine. Selenium concentrations were substantively less in the Attichika wetlands relative to upper Waste Rock Creek sampling stations. The results of these studies and routine monitoring are discussed in the FAEMP.

> *3.7.5 monitor the presence and use of spawning habitat by bull trout (Salvelinus confluentus) and rainbow trout (Oncorhynchus mykiss) downstream of the discharge location in Attichika Creek prior to and after the installation of the discharge pipeline into Attichika Creek. The Proponent shall offset any loss of spawning habitat for bull trout (Salvelinus confluentus) and rainbow trout (Oncorhynchus mykiss) in Attichika Creek if monitoring results show that spawning habitat loss has occurred;*

A targeted bull trout (*Salvelinus confluentus*) telemetry study was conducted between 2017 and 2021 to assess fish movements before and after installation of the effluent diffuser. In 2025, Chu Cho Environmental (Chu Cho) completed the annual fish monitoring studies, including Bull Trout redd counts and juvenile salmonid electrofishing surveys within the Attichika Creek watershed. Results indicate above-average Bull Trout redd counts and strong juvenile salmonid densities, consistent with a stable and healthy Bull Trout population in the watershed.

Adult abundance in lower Attichika Creek, including areas within the mine footprint, was above average in 2025, and juvenile bull trout abundance in lower Attichika Creek was also higher than average. These results indicate that the watershed continues to support a healthy adult bull trout population and that spawning activity remains stable or improved relative to long-term averages.

During redd surveys, spawning habitats were assessed for potential barriers to fish movement or changes in habitat quality over time, and continuous temperature monitoring supplemented visual observations.

Overall, monitoring results for 2025 indicate that channel form, sediment conditions, and spawning utilization downstream of the diffuser remain stable or improved relative to historical conditions. There is no evidence of a loss of spawning habitat for bull trout or rainbow trout (*Oncorhynchus mykiss*) downstream of the discharge location in Attichika Creek, and no habitat offset has been required.

3.7.6 monitor contaminants, including mercury, in the tissue of fish species harvested by Indigenous groups in Thutade Lake, including bull trout (Salvelinus confluentus)

In 2025, non-lethal tissue sampling of bull trout (*Salvelinus confluentus*) was conducted as part of the FAEMP to support monitoring of contaminants in fish species relevant to Indigenous harvesting. A total of 12 individuals were captured and sampled from Attichika Creek (n = 12). Results indicate that selenium and mercury concentrations in fish tissue remained consistent with historical conditions, with no evidence of increasing trends or mine-related bioaccumulation. Selenium concentrations remained below the British Columbia Water Quality Guideline (BCWQG) for the protection of aquatic life (4 mg/kg dry weight), while mercury concentrations exceeded the BCWQG (0.033 mg/kg wet weight), but were consistent with concentrations observed in regional reference systems not influenced by mine activities.

Overall, the 2025 results indicate that mine discharges are not contributing to elevated contaminant concentrations in fish tissue, and that observed mercury levels reflect natural background conditions typical of large, piscivorous fish in the region.

4. Condition 4: Migratory Birds

4.1. Condition 4.1

The Proponent shall carry out Designated Project activities in a manner that protects migratory birds and avoids harming, killing, or disturbing migratory birds or destroying, disturbing, or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Avoidance Guidelines. The Proponent's actions in applying the Avoidance Guidelines shall be in compliance with the Migratory Birds Convention Act, 1994 and with the Species at Risk Act.

No vegetation clearing work was completed within the project footprint in 2025 and no disturbance to migratory birds occurred as a result of project activities.

4.2. Condition 4.2

The Proponent shall deter migratory birds from accessing the tailings storage facility and seepage ponds until water quality is not harmful to migratory birds.

The KUG Project has not entered into the operations phase and no tailings have been deposited into the KUG TSF. Use of the KUG TSF and seepage ponds by migratory birds was monitored throughout the 2025 reporting year, as required by the Wildlife Management and Monitoring Plan (WMMP) and as part of ongoing on-site wildlife reporting. No instances of birds accessing or inhabiting the KUG TSF or seepage ponds were observed in 2025.

The requirement to protect migratory birds is established under the Migratory Birds Convention Act, 1994; however, it does not prescribe specific deterrent methods. As outlined in the WMMP, deterrents (e.g., visual and/or auditory methods) are selected based on applicable guidance, including Environment and Climate Change Canada avoidance guidelines, industry best practices, and site-specific conditions, and will be implemented as needed using an adaptive management approach if bird use is observed. Monitoring will continue in 2026.

4.3. Condition 4.3

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 and 4.2. The Proponent shall implement the follow-up program from the start of construction to the end of decommissioning.

Bi-weekly surveys of infrastructure potentially used by swallows for nesting during the breeding season were completed in accordance with the WMMP. These surveys showed that both barn swallows (*Hirundo rustica*) and tree swallows (*Tachycineta bicolor*) preferred the Accommodations area for nesting, possibly due to the availability of more open-sheltered areas to protect their nests. In comparison, it was noted that tree swallows nested on higher abandoned buildings, where the swallows were able to access old air intakes. Cliff swallows (*Petrochelidon*

pyrrhonota) preferred to nest around the Mill area, where the conveyor is located approximately 80 meters from the ground, as it appears that these swallows prefer the high areas on-site to protect their nests from predators.

Please refer to the 2025 Annual Reclamation Report for more information, which has the nest data per location for each swallow type and description of monitoring methods utilized.

5. Condition 5: Human Health

5.1. Condition 5.1

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse effects on the health of Indigenous Peoples caused by changes in concentrations of contaminants of potential concern identified during the environmental assessment in air, soil, water, and sediment. The Proponent shall implement the follow-up program during construction and operation. As part of the development of the follow- up program, the Proponent shall:

> *5.1.1 identify levels of environmental change relative to established baseline conditions for contaminants of potential concern that would require the Proponent to implement modified or additional mitigation measure(s) to mitigate increased risks to human health; and*
>
> *5.1.2 if monitoring results demonstrate that concentration levels for contaminants of potential concern are greater than the identified levels of environmental change, update the human health risk assessment for the consumption of traditional foods exposed to these contaminants and communicate the results of the updated human health risk assessment to Indigenous groups.*

AuRico circulated the proposed Human Health Follow-up Program to Tsay Keh Dene, Takla and Kwadacha via email on March 20, 2018. A reminder of requests for feedback was discussed at the April 20, 2018, EMC meeting. To date no comments have been received.

As per Section 4.4 of the Human Health Follow-up Program and Section 3.4 of Kemess's Ecosystem Management Plan, soil and vegetation sampling was conducted in 2022 and detailed information can be found in the report titled, *Kemess 2022 Soil and Veg Sampling and Screening Study.* The report was submitted in March 2023. Vegetation used by wildlife for forage was targeted, including sedges, lichens, and willows. Soil and vegetation were sampled on-site in different areas exposed to industrial activities, as well as at non-impact control sites. The soil and vegetation were analyzed for trace metal uptake. The soil sample results were compared to both CCME soil quality guidelines and EMA Contaminated Site Regulation (CSR) numerical soil standards . The vegetation sample results at exposure sites were compared to the non-impact control sites using statistical analyses. Metal concentrations in soil were above guidelines in the

KUG area (yet to be developed) and in the KS area (previously impacted); however, this likely reflects background concentrations for these areas. Importantly, uptake of metals in vegetation compared well with references sites, indicating no adverse uptake in plants or risk to flora, fauna, and people. Average metal concentration in soil and vegetation at the Omineca Resource Access Road (ORAR) sites were below the CCME guidelines and CSR standards.

This sampling was conducted to match the frequency of the Reclamation and Closure Plan update, which also occurred in 2022.

6. Condition 6: Current Use of Lands and Resources for Traditional Purposes

6.1. Condition 6.1

The Proponent shall install and maintain, during construction and operation, ramps every 100 to 300 metres over the discharge line between the tailing storage facility and Attichika Creek to provide passage for moose (Alces alces), woodland caribou (Rangifer tarandus caribou), grizzly bear (Ursus arctos), and furbearers. The Proponent shall identify the locations of ramps in consultation with Indigenous groups and relevant authorities.

The discharge line between the KUG TSF and Attichika Creek was installed in 2018. As the entire discharge line was buried at the time of installation, wildlife access has never been impeded, thereby removing the need for installation of ramps.

6.2. Condition 6.2

The Proponent shall create and maintain, during construction and operation, escape pathways along all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road, to allow ungulates to exit the plowed roads. The Proponent shall identify the locations of escape pathways in consultation with Indigenous groups and relevant authorities.

During winter, snowbank breaks are created every 300 metres adjacent from each other along mine roads to allow movement of wildlife. During all snow-laden months in 2025, the ORAR was not maintained or plowed; therefore, there was no need for monitoring to ensure safe passage of ungulates exiting plowed roads.

In the spring, summer and fall of 2025, a contractor was retained as per the TSAY KEH DENE, TAKLA AND KWADACHA IBA to complete brushing and road maintenance on the ORAR.

6.3. Condition 6.3

The Proponent shall, from the start of construction to the end of decommissioning, remove carrion within 24 hours of its discovery by the Proponent from all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road.

Carrion observed by AuRico staff and contractors in 2025 were limited to one stone sheep (*Ovis dalli stonei*), one moose calf (*Alces alces*) and one barn swallow. All were clear of Project roads and presumed deceased due to predation or natural causes. Carrion monitoring and removal will continue through the life-of-mine to the end of decommissioning. As per the WMMP, Kemess tracked incidental wildlife occurrences on the mine site and also on the ORAR corridor. All wildlife observations by Kemess staff and contractors were communicated to the Kemess environmental department via in-person communication, radio communication, or self-documentation. Employees have always been encouraged to submit photos along with the location, date and time

of observation to help confirm the identification of the species and track movement. In 2025, the Incidental Wildlife Observation Sheet was updated to include the recording of wildlife track observations, improving the documentation of incidental wildlife presence on site. A summary of wildlife observations is under separate cover in the 2025 Annual Reclamation Report.

6.4. Condition 6.4

The Proponent shall prohibit employees and contractors associated with the Designated Project from fishing, hunting, and trapping within the Project Area, unless an employee or a contractor is provided access by the Proponent for traditional purposes or for exercising Aboriginal rights, to the extent that such access is safe.

As per condition 6.4, AuRico created the *No Fishing, Hunting and Gathering Policy* on June 29, 2018, which is reviewed as part of the new worker mine site orientation. The Kemess Mine *No Fishing, Hunting and Gathering Policy* is designed to ensure safety of Kemess Mine personnel, contractors and the general public in the Kemess Mine area, as well as for the protection of fish, wildlife and plant resources at the mine. The policy defines that hunting, fishing or trapping, mushroom, berry picking, or the gathering of plants is not permitted by mine personnel or contractors at the mine site at any time. The policy is communicated to all employees at the Kemess Mine when undergoing mine site orientation. Supplementary signage is posted at site entrances displaying the policy.

6.5. Condition 6.5

The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, conduct pre-clearing surveys to identify Western toad (Anaxyrus boreas) breeding habitat, and shall implement measures to mitigate the loss of Western toad (Anaxyrus boreas) breeding habitat caused by the Designated Project.

Prior to the official permit application submission, AuRico consulted with Tse Keh Nay (Tsay Keh Dene, Takla and Kwadacha) on the development of the WMMP. To date, no comments on the western toad (*Anaxyrus boreas*) pre-clearing surveys have been received. AuRico and Tsay Keh Dene, Takla and Kwadacha continue to consult on management plans and follow up program development through established collaboration and consultation methods espoused within the 2017 IBA.

AuRico, through its joint EMC with Tsay Keh Dene, Takla and Kwadacha, discusses plans for any major pre-clearing surveys and the subsequent results with Tsay Keh Dene, Takla and Kwadacha.

Pre-clearing bird, furbearers and amphibian surveys were not conducted in 2025 as no vegetation clearing or construction work was done in 2025.

6.6. Condition 6.6

The Proponent shall conduct pre-clearing surveys to determine the distribution of little brown myotis (Myotis lucifugus) and Northern myotis (Myotis septentrionalis), and establish, in consultation with Indigenous groups and relevant authorities, buffer zones around active hibernacula and active roosts.

During the permitting process, Tsay Keh Dene, Takla and Kwadacha, via their consultants at EDI, provided feedback on the bat pre-clearing surveys, submitting seven questions. Tsay Keh Dene, Takla and Kwadacha comments focused on the methodology used to identify what species of bat were roosting in the area and which roosting structures or nursery bat boxes were actively used.

AuRico conducted initial bat habitat surveys in November of 2017 to inform the initial offsetting requirements for roosting structures. In April 2018, pre-clearing surveys were conducted prior to construction initiating in July and 35 nursery bat boxes were installed. Surveys of the bat boxes showed only one instance of bat activity at these sites in 2020. KUG construction has since paused and no further disturbance to bat habitat has occurred.

6.7. Condition 6.7

The Proponent shall install, prior to construction, and maintain, during construction and operation, roosting structures to offset any loss of little brown myotis (Myotis lucifugus) and Northern myotis (Myotis septentrionalis) roosting habitat.

In 2024, select bat boxes were rebuilt and repositioned to improve the potential for roosting. In 2025, bi-weekly bat monitoring was implemented to align with and support the infrastructure inspection requirements outlined in the WMMP. In addition to the 35 bat boxes installed in 2018, additional roosting structures will be installed in the event that further habitat loss is anticipated throughout Project construction and operation. Disturbance will only be considered to result in loss of bat habitat if monitoring indicates that bats are present in the area, and if the Project disturbance would result in clearing of suitable roosting habitat for little brown myotis (*Myotis lucifugus*) and northern myotis (*Myotis septentrionalis*).

6.8. Condition 6.8

The Proponent shall develop and implement a follow-up program to monitor the little brown myotis (Myotis lucifugus) and Northern myotis (Myotis septentrionalis) usage of buffer zones and roosting structures to determine the effectiveness of the mitigation measures during construction and operation.

In addition to the monitoring described above, in 2022, liners were placed under the bat boxes to better detect usage during non-hibernating months. There were no observations of guano on the liners in 2025 during the bi-weekly surveys, and there were no incidental observations of bats at

the Mine. Given the very limited observation of bats using the bat boxes or in undisturbed habitat on the Project Site, it appears that the potential for presence of bats in the Project area has been over-stated. Additionally, for the past three years (2023-2025) there has been no further disturbance to potential bat habitat and limited anthropogenic activity on site which would deter bat habitation.

In 2025, bi-weekly bat monitoring was implemented to align with and support the infrastructure inspection requirements outlined in the WMMP. No bat-specific buffer zones have been established at the Project, as no bat presence or roosting activity has been observed over five consecutive years of monitoring. Condition 6.9

The Proponent shall, in consultation with Indigenous groups, undertake progressive reclamation of the habitats disturbed by the Designated Project. The Proponent shall use native species when undertaking that progressive reclamation.

Progressive reclamation within the Project footprint is conducted where possible in accordance with the 2022 Reclamation and Closure Plan. The plan prescribes native seed mixes for reclamation works. In 2025, progressive reclamation activities focused on stabilizing disturbed areas and promoting vegetation establishment. Hydroseeding was completed along the diffuser road and along the SP-27 ditch constructed in 2023. The OB1 Stockpile was reclaimed to support surface stabilization and seed establishment. The slope adjacent to the Dam was also hydroseeded to enhance erosion control and vegetation establishment. In addition, the ditch located behind the BXL ponds was hydroseeded to promote long-term stability and support erosion and sediment control objectives. Maintenance activities included contouring and seeding various exposed slopes prone to erosion around the site. Site updates regarding erosion and sediment control are provided during quarterly EMC meetings, as well as an opportunity for comment and further discussion.

6.9. Condition 6.10

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of hoary marmot (Marmota caligata), white-tailed ptarmigan (Lagopus leucura), and short-eared owl (Asio flammeus) within the subsidence zone identified by the Proponent during the environmental assessment and within a buffer area of 250 metres along the limits of that subsidence zone. The Proponent shall implement the follow-up program during construction and operation.

AuRico submitted its initial draft permit application to MMO on August 31, 2017. Prior to the official permit application submission, AuRicoconsulted with Tsay Keh Dene, Takla and Kwadacha on the development of the WMMP and circulated a draft copy of the plan for comment and feedback on June 30, 2018, 60 days in advance of the official permit submission. Permitting and permitting consultation activities with relevant authorities and Tsay Keh Dene, Takla and Kwadacha as part of the Mine Review Committee (MRC) for KUG, concluded in quarter (Q) 2 of 2018. To date, no specific feedback has been received on the subsidence zone follow-up program. AuRico and

Tsay Keh Dene, Takla and Kwadacha continue to consult on management plans and follow-up program development through the permitting process and established collaboration and consultation methods espoused within the 2017 IBA.

As per the WMMP, field surveys must be conducted in areas deemed important habitat for the hoary marmot (*Marmota caligata*), white-tailed ptarmigan (*Lagopus leucura*) and short-eared owl (*Asio flammeus*) prior to clearing and/or construction activities in the subsidence zone. Exploration drilling occurred at the subsidence zone in 2025. Field surveys were conducted by a third-party company when needed for earth works. No wildlife habitats were disturbed in the installation of drill pads and the subsequent exploration drilling.

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6.10. Condition 6.11

The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the effects of changes caused by the Designated Project to the Chase herd of Southern mountain caribou (Rangifer tarandus caribou) and the Thudade herd of Northern mountain caribou (Rangifer tarandus caribou) on caribou hunting activities for traditional purposes and to determine the effectiveness of the mitigation measures. The Proponent shall implement the follow-up program from the start of construction to the end of decommissioning. As part of the follow-up program, the Proponent shall:

6.11.1 monitor, during construction and the first three years of operation, the use by moose (Alces alces), woodland caribou (Rangifer tarandus caribou), grizzly bear (Ursus arctos), and furbearers of the ramps referred to in condition 6.1 and of the escape pathways referred to in condition 6.2; and
6.11.2 monitor mortality of wildlife on all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road.

Follow up programs for conditions 6.11.1 and 6.11.2 are outlined in sections 6.1 and 6.2, respectively.

As part of the on-site monitoring program, all wildlife sightings observed on the mine site and on the ORAR by Kemess staff and contractors are recorded. In addition, there are game cameras set up at Kemess North, Kemess Lake Valley, Attichika Diffuser, and above the KUG TSF year-round.

Sightings of caribou (*Rangifer tarandus caribou*), grizzly bear (*Ursus arctos*) and moose on the Kemess Mine site and on the ORAR in 2025 are summarized in Table 1.

Table 1: Kemess Mine & ORAR Wildlife Sightings - 2025

Month	Number of Sightings		
	Moose	Woodland Caribou	Grizzly Bear
May	15	12	15
June	8	6	36
July	3	9	22
August	0	3	6
September	5	4	9
October	0	0	3
December	1	0	0

A graph summarizing the total number of wildlife sightings on the mine site for 2025 is provided in Appendix B.

Mortality of one moose calf, one stone sheep and one barn swallow were observed due to natural predation or natural causes on the Kemess mine roads.

6.11. Condition 6.12

The Proponent shall provide Indigenous groups with the implementation schedule, updates, or revisions to the implementation schedule pursuant to conditions 10.1 to 10.3 at the same time the Proponent provides these documents to the Agency.

In 2025, the Proponent provided the implementation schedule and any updates pursuant to Conditions 10.1 to 10.3 to Indigenous groups at the same time these documents were submitted to the Impact Assessment Agency of Canada, ensuring concurrent distribution and transparency.

7. Condition 7: Physical and Cultural Heritage and Structures, Sites, or Things of Historical, Paleontological, or Architectural Significance

7.1. Condition 7.1

The Proponent shall, for any previously unidentified archeological structures, sites, or things of historical, archaeological, paleontological, or architectural significance discovered by the Proponent or brought to the attention of the Proponent by an Indigenous group, Gitxsan Wilp Nii Kyap, or another party during any phase of the Designated Project:

7.1.1 immediately halt work at the location of the discovery;

7.1.2 have a qualified individual conduct an assessment at the location of the discovery;

7.1.3 inform, forthwith, in writing, Indigenous groups and Gitxsan Wilp Nii Kyap of the discovery, and allow for monitoring by Indigenous groups and Gitxsan Wilp Nii Kyap during archeological work; and

7.1.4 comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring, and safekeeping of previously unidentified archeological structures, sites, or things of

historical, archaeological, paleontological, or architectural significance.

No archaeological finds occurred throughout the course of Project activities in 2025.

In early August 2017, an Archeological Impact Assessment (AIA) of five ancillary development areas to the proposed KUG was conducted to ensure compliance with the *Heritage Consultation Act* (HCA) prior to any ground altering activities. A total of 70 hectares (ha) of area was surveyed, 295 tests were excavated, and 15 exposures were inspected. The field crew consisted of Millennia Research Ltd. (Millenia) personnel and members of Tsay Keh Dene, Kwadacha, and Takla Lake First Nations.

In 2018, an Archaeological Chance Find Procedure was developed for the Project as part of the Heritage Management Plan. It outlines a standard operating procedure should heritage sites that were not identified during baseline studies be discovered during Construction or Operations. The Archaeological Chance Find Procedure includes the following steps if personnel suspect archaeological, traditional use, and paleontological materials or human remains are discovered:

- Immediately contact the Environmental Coordinator or Construction Manager to implement a stop work order to reduce/minimize impacts to the site;
- Leave the material in place and protect and/or mark the area around the site, and do not disturb or collect any archaeological, paleontological, heritage materials, or human remains; and
- Report the discovery to their immediate Supervisor.

The General Manager and the Project Archaeologist will also be notified as outlined in the management plan. The Archaeology Branch of the BC Government and local Indigenous groups/organizations will be advised of the discovery, if necessary. Final mitigation measures will be determined through consultation with the Archaeology Branch.

7.2. Condition 7.2

The Proponent shall not undertake any ground altering activities within 50 metres of the boundaries of archeological sites, unless authorized by relevant authorities.

No ground disturbance occurred in the vicinity of known archaeological sites in the Project footprint in 2025. As per Kemess's Heritage Management Plan (HMP), all known archaeological sites within 150 m of the Project footprint have been clearly indicated on development maps in relation to the Project footprint components. If construction occurs within 150 m of a protected heritage site, the site will be flagged or temporarily fenced to serve as a visible barrier. The Kemess Environmental Monitor will monitor for archaeological site impacts or situations where construction activities occur less than 50 m from a site. Should impacts be anticipated or found to have occurred within 50 m of an archaeological site, the Project Archaeologist will be contacted to determine if additional mitigation measures are required. Environment Department personnel will be fully briefed on the HMP and resulting mitigation measures.

During construction activities, the preferred mitigation measure for archaeological sites is

avoidance.

8. Condition 8: Independent Environmental Monitor

8.1. Condition 8.1

Prior to the start of construction, the Proponent shall retain the service of an independent environmental monitor, who is a qualified individual as it pertains to environmental monitoring of mining projects in British Columbia, to observe, record, and report on the implementation of the mitigation measures set out in this Decision Statement.

EDI was retained in 2018 as the Kemess Mine independent environmental monitor (IEM). A formal Terms of Engagement Document was submitted to AuRico by EDI in April 2018 and revised in 2022.

EDI was retained as an IEM throughout the 2025 reporting period. EDI completed two desktop inspections for the project in 2025. . EDI was scheduled for a site visit in September 2025 but due to the logistics of driving to site,the visit was postponed to October. The rescheduled site visit was then cancelled, due to flight logistics and lack of available seats.

8.2. Condition 8.2

The Proponent shall give the independent environmental monitor the authority to stop Designated Project activities that do not comply with the conditions set out in this Decision Statement.

As per the IEM Terms of Engagement document, the IEM has the authority to stop work and will keep record of all Stop Work Orders where works are resulting in, or are at imminent risk of, causing material environmental damage, in accordance with the Decision Statement and applicable legislation.

A Stop Work Order may be issued under two circumstances:

- In the event where an environmental incident, or where the completion of works at or in proximity to the location of the incident, has the potential to cause material unauthorized environmental impacts.
- In the event that a lack of compliance with the Provincial Environmental Assessment Certificate (EAC; M17-01) conditions, other authorizations/permits and management plans has the potential to cause unauthorized adverse material environmental effects and previous communications with the responsible parties have not led reasonable corrective action.

Under both circumstances, the IEM will inform the responsible parties, EAO, IAAC and the Proponent (AuRico) of the issue within 24 hours and provide rationale and high-level options/considerations for achieving compliance as soon as possible. A recommendation to lift the Stop Work Order will occur when the IEM is satisfied that the appropriate steps have been taken to ensure compliance.

To date, no Stop Work Orders have been issued by the IEM.

8.3. Condition 8.3

The Proponent shall require the independent environmental monitor to prepare reports that include:

> *8.3.1 a description, including through photo evidence, of the Designated Project activities that occurred and the mitigation measures that were applied during the period covered by the report; and*
> *8.3.2 if any, a description, including through photo evidence, of occurrences of non-compliance related to the implementation of mitigation measures set out in this Decision Statement Page 12 of 14 observed during the period covered by the report, the date of the occurrence(s) of non-compliance, whether Designated Project activities were stopped as a result of non-compliance, how the occurrence(s) of non-compliance was or were corrected by the Proponent, the date that the corrective action(s) was or were completed by the Proponent, or, if any, the status of pending occurrence(s) non-compliance that have not been corrected yet, and a description of any adverse environmental effect(s) associated with the occurrence(s) of non-compliance.*

The first IEM site visit and inspection occurred July 11-12, 2018. In 2024, IEM site visits were reduced due to the mine site being in care and maintenance and reduced flight frequency to site. As a result**,** inspections were conducted through structured questionnaires and desktop reviews of site documentation and monitoring data. These desktop inspections allowed IEM representatives to continue oversight of site activities and environmental performance despite the logistical constraints associated with limited site access. In 2025, the IEM prepared reports in June and November, which were forwarded to IAAC,Tsay Keh Dene, Takla and Kwadacha, and provincial regulators.

As per the July 2022 EMC Terms of Reference document, an annual meeting occurred between AuRico, the IEM, EAO, IAAC, and other regulators and Indigenous groups on May 5, 2025..

At each meeting, the Holder (AuRico) will provide a summary of Project activities since the last meeting and forecasted construction activities. The IEM will provide an update on the following items.
Review of previous environmental concerns and status; and

- Summary of new environmental non-compliances and incidences, all corrective actions undertaken and successes of those actions.

The IEM will document, through written and photo documentation, any relevant inspections and communications pertaining to any non-compliance within the IEM checklist and the issue tracking log. Non-compliances will be closed out pending corrective action and removed from the issue

tracking log in the subsequent report following indication of closure. Corrective actions by the Holder will be documented in the monthly report along with the date of corrective actions, the status of pending occurrences that have not been corrected yet, and a description of any adverse environmental effects associated with the occurrences of non-compliance.

8.4. Condition 8.4

The Proponent shall require the independent environmental monitor to retain the reports referred to in condition 8.3 until the end of decommissioning. The Proponent shall require the independent environmental monitor to provide the reports referred to in condition 8.3 to the Agency, Indigenous groups, and relevant federal authorities within 10 days of their production. If occurrence(s) of non-compliance are observed by the independent environmental monitor, the Proponent shall require the independent environmental monitor to report all occurrence(s) of non-compliance directly to the Agency, Indigenous groups, and relevant federal authorities within 24 hours.

AuRico has communicated the requirement for the IEM to retain compliance reports until the end of decommissioning. The IEM will be tasked with documenting compliance with the EAC conditions and management plan commitments throughout all Project phases. The IEM will provide information to EAO, IAAC, BC Ministry of Mining and Critical Minerals (MCM), ENV, BC Ministry of Forests (MOF), BC Ministry of Land, Water and Resource Stewardship (WLRS), and to Indigenous groups as directed by EAO and set out in the Decision Statement. The IEM will not provide such information or reports to the Holder in advance of providing such information or reports to the EAO and IAAC. The IEM will submit monthly (or following their site visit) a report to the Holder, the EAO, and IAAC simultaneously via email. Information or reports related to non-compliance will not be submitted to the Holder in advance of providing the information to the EAO and IAAC.

To align with Condition 12 of the Provincial EAC in reference to the EMC, and item 8.4 of the Decision Statement to provide reports to Indigenous groups, the IEM will submit the monthly (subject to site visit) and end of phase reports to the EMC on behalf of the Holder.

9. Condition 9: Accidents and Malfunctions

9.1. Conditions 9.1, 9.2, 9.3, 9.4

9.1 The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.

9.2 The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.

9.3 The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an emergency response plan in relation to the Designated Project.

9.4 In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall implement the emergency response plan referred to in condition 9.3 and shall:

9.4.1 notify Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities of the accident or malfunction as soon as possible, and notify the Agency in writing;

9.4.2 implement immediate measures to mitigate any adverse environmental effects associated with the accident or malfunction;

9.4.3 submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction took place. The written report shall include:

9.4.3.1 a description of the accident or malfunction and of its adverse environmental effects;

9.4.3.2 the measures that were taken by the Proponent to mitigate the adverse environmental effects of the accident or malfunction;

9.4.3.3 any views received from Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities with respect to the accident or malfunction, its adverse environmental effects, and measures taken by the Proponent to mitigate adverse environmental effects;

9.4.3.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects;

9.4.3.5 details concerning the implementation of the emergency response plan referred to in condition 9.3; and

9.4.4 submit a written report to the Agency, no later than 90 days after the day on which the

accident or malfunction took place, on the changes made to avoid a subsequent occurrence of the accident or malfunction, and on the implementation of any modified or additional measures to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information in the written report submitted pursuant to condition 9.4.3.

AuRico Metals submitted its permit application to MMO on August 31, 2017. Prior to the official permit application submission, AuRico consulted with Tsay Keh Dene, Takla and Kwadacha on the development of the Minne Emergency Response Plan (MERP), circulating a draft copy of the plan for comment and feedback on June 30, 2018, which was 60 days in advance of the official permit submission. The MERP was developed in consideration to conditions 9.3 and 9.5.

To date, no comments from Tsay Keh Dene, Takla and Kwadacha have been received on the MERP or the Accidents and Malfunctions Communication Plan (AMCP).

AuRico and Tsay Keh Dene, Takla and Kwadacha continue to consult on management plans through the permitting process and through established collaboration and consultation methods espoused within the 2017 IBA. Permitting and permitting consultation activities with relevant authorities and Tsay Keh Dene, Takla and Kwadacha for KUG is ongoing. The MRC is paused until construction is initiated at the mine site for development of KUG.

Reporting of accidents and malfunctions has followed the process outlined in this condition when required, by notifying the parties specified in 9.4.1.

9.2. Condition 9.5

The Proponent shall develop and implement a communication plan in consultation with Indigenous groups and Gitxsan Wilp Nii Kyap. The Proponent shall develop the communication plan prior to construction and shall implement and maintain it up to date from the start of construction to the end of decommissioning. The plan shall include:

9.5.1 the types of accidents and malfunctions requiring the Proponent to notify the respective Indigenous groups and Gitxsan Wilp Nii Kyap;

9.5.2 the manner by which Indigenous groups and Gitxsan Wilp Nii Kyap shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups and Gitxsan Wilp Nii Kyap to assist in the response to the accident or malfunction; and

9.5.3 the contact information of the representatives of the Proponent that the Indigenous groups and Gitxsan Wilp Nii Kyap may contact and of the representatives of the respective Indigenous groups and Gitxsan Wilp Nii Kyap to which the Proponent provides notification.

As per Condition 9.5, the Accidents and Malfunctions Communication Plan was developed in

2018 to guide the co-ordination of communications between the organization and any applicable outside agencies (e.g. regulatory agencies, stakeholders, and the public) in the event of an accident and/or malfunction resulting from the KUG Project.

This plan identifies the types of accidents and malfunctions requiring notification to external stakeholders and the timeframe of notification (including updates subsequent to the initial notification) to each Indigenous Group, community, and other users of the area that could be affected by an accident and/or malfunction.

AuRico circulated the draft Accidents and Malfunctions Communication Plan to Gitxsan Wilp Nii Kyap on December 22, 2017. The Plan was finalized in 2018 but remains as a living document, open for collaboration within the 2023 Kemess Relationship Agreement and associated Environmental Working Group.

10. Condition 10: Implementation Schedule

An update to the implementation schedule for the Decision Statement is provided in Appendix A.

11. Closure

Respectfully submitted,

Matthew Gerolami, P. Biol

Environmental Coordinator
Kemess Mine
Matthew.gerolami@Centerragold.com
604-424-8200 x13823

APPENDIX A

Kemess Underground Project 2025 Decision Statement Implementation Schedule

AuRico Metals Inc., a wholly owned subsidiary of Centerra Gold Inc.
1 University Avenue, Ste. 1500,
Toronto, Ontario, M5J 2P1

Submitted electronically to: postdecision@iaac-aeic.gc.ca

Impact Assessment Agency of Canada
22nd Floor, Place Bell
160 Elgin Street, Ottawa
ON K1A 0H3, Canada

March 31, 2026

To Whom It May Concern,

Re: AuRico Metals Inc. Kemess Underground Project, Decision Statement Condition #10.3 Implementation Schedule

As per IAAC Condition 10.3 of the March 13, 2017 AuRico Metals Kemess Underground Project which states:

"The Proponent shall provide the Agency with a revised implementation schedule if any material change(s) occur from the initial schedule referred to in condition 10.1 or any subsequent update(s)."

Enclosed in the IAAC report contains an updated Implementation Schedule for the Kemess Underground Project. Currently, the project is in Care and Maintenance. The attached schedule outlines the proposed implementation plan for the project's future. Also please reference Chapter 3, Section 3.2 of the Mines Act Application for the construction schedule of the Project
Please note that this schedule is subject to change in future years. AuRico will provide updated schedules within subsequent annual reports, submitted by March 31 each year.

If you have any questions or concerns, please do not hesitate to contact me directly.

Sincerely,

Matthew Gerolami
Environmental Coordinator, Kemess Underground Project
matthew.gerolami@centerragold.com

C.c. Takla Lake First Nation
Tsay Keh Dene First Nation
Kwadacha First Nation
Gitxsan Wilp Nii Kyap First Nation

AuRico Metals Inc Kemess Underground Implementation Schedule

CEAA Condition	Condition	Commencement Date	Completion date
2	**General Conditions**		
2.1	The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement 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 achievable technologies.	March 13, 2017	End of all Project phases

2.2	The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement: 2.2.1 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; 2.2.2 provide sufficient information on the scope and the subject matter of the consultation and a reasonable period of time to permit the party or parties being consulted to prepare their views and information; 2.2.3 provide a full and impartial consideration of any views and information presented by the party or parties being consulted on the subject matter of the consultation; and 2.2.4 advise in a timely manner the party or parties being consulted on how their views and information have been considered by the Proponent.	March 13, 2017	End of all Project phases
2.3	The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with	March 13, 2017	End of all Project phases

	respect to the manner by which to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to be provided when seeking input, the process for full and impartial consideration of any views and information presented on the subject of the consultation, and the means by which Indigenous groups will be informed of how their views and information have been considered by the Proponent.		
2.4	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of the follow-up program and in consultation with Indigenous groups and relevant authorities, the following information, for each follow-up program: 2.4.1 the methodology, location, frequency, timing, and duration of monitoring associated with the follow-up program as well as the scope, content, and frequency of reporting of the follow-up results; 2.4.2 the levels of environmental change relative to established baseline	April 1, 2018	End of all Project phases

	conditions that would require the Proponent to implement additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and 2.4.3 the range of 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 2.4.2 have been reached or exceeded.		
2.5	The Proponent shall submit the information referred to in condition 2.4 to the Agency prior to the implementation of a follow-up program. The Proponent shall update that information in consultation with Indigenous groups and relevant authorities during the implementation of the follow-up program, and shall provide the updated information to the Agency, Indigenous groups, and relevant authorities within 30 days of the information being updated.	April 1, 2018	End of all Project Phases
2.6	The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement:	April 1, 2018	End of all Project Phases

	2.6.1 conduct the follow-up program according to the information determined pursuant to condition 2.4; 2.6.2 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); 2.6.3 determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.6.2; and 2.6.4 if modified or additional mitigation measures are required pursuant to condition 2.6.3, 2.6.4 develop and implement the modified or additional mitigation measures in a timely manner and monitor them pursuant to condition 2.6.2.		
2.7	Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for the participation of that Indigenous group in the implementation of the follow-up program, including the analysis of the follow-up results and whether modified	March 13, 2017	End of all Project phases

	or additional mitigation measures are required, as set out in condition 2.6.		
2.8	The Proponent shall follow the consultation process outlined in conditions 2.3, 2.4, 2.5, and 2.7 when consulting Gitxsan Wilp Nii Kyap for the purpose of conditions 3.7 and 9.5.	January 27, 2023	End of all Project phases
2.9	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: 2.9.1 the activities undertaken in the reporting year to comply with each of the conditions set out in this Decision Statement; 2.9.2 how the Proponent complied with condition 2.1; 2.9.3 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;	March 13, 2017	End of all Project phases

	2.9.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program; 2.9.5 the results of the follow-up program requirements identified in conditions 3.7, 4.3, 5.1, 6.10, and 6.11; and 2.9.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.6.		
2.10	The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including an executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.	March 31, 2017	End of All Project Phases
2.11	The Proponent shall publish on the Internet, or any medium which is widely publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10, the reports related to accidents and malfunctions referred to in conditions 9.4.3 and 9.4.4, the communication plan referred to in condition 9.5, the implementation schedule referred to in condition 10.1, and any update(s) or revision(s) to the above documents,	April 1, 2017	End of All Project Phases

	upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available throughout construction and operation and until the end of decommissioning. The Proponent shall notify the Agency, Indigenous groups, and Gitxsan Wilp Nii Kyap of the availability of these documents upon publication.		
2.12	The Proponent shall notify the Agency and Indigenous groups in writing no later than 60 days after the day on which there is a transfer of ownership, care, control, or management of the Designated Project in whole or in part.	As required	End of all Project phases
2.13	The Proponent shall consult with Indigenous groups prior to initiating any material change(s) to the Designated Project that may result in adverse environmental effects and shall notify the Agency in writing no later than 60 days prior to initiating the change(s).	As required	End of all Project phases
2.14	In notifying the Agency pursuant to condition 2.13, the Proponent shall provide the Agency with a description of the potential adverse environmental effects of the change(s) to the Designated Project, the measures proposed to be implemented by the	As required	End of all Project phases

	Proponent to mitigate adverse environmental effects, and the results of the consultation with Indigenous groups.		
3			
3.1	The Proponent shall implement erosion and sedimentation control measures within the Project area during all phases of the Designated Project to avoid the deposit of deleterious substances in waters frequented by fish.	April 1, 2018	End of all Project Phases
3.2	The Proponent shall, taking into consideration Fisheries and Oceans Canada's *Measures to Avoid Causing Harm to Fish and Fish Habitat Including Aquatic Species at Risk,* implement mitigation measures when conducting Designated Project activities to avoid causing harm to fish and fish habitat, including timing work in or around water to respect the timing windows identified to protect fish.	April 1, 2018	End of all Project Phases
3.3	The Proponent shall comply with the *Metal Mining Effluent Regulations* and subsection 36(3) of the *Fisheries Act* regarding the deposit of effluent from the Designated Project in water frequented by fish, taking into account the Canadian Council of Ministers of the Environment's *Water Quality Guidelines for the Protection of Aquatic Life*, from	April 1, 2018	End of all Project Phases

	the start of construction to the end of decommissioning. In doing so, the Proponent shall: 3.3.1 place all acid-generating and potentially acid-generating material into the tailings storage facility and submerge all such materials placed in the tailings storage facility under a permanent water cover; and 3.3.2 collect and treat all waters affected by the Designated Project that do not meet the requirements of the *Metal Mining Effluent Regulations* and subsection 36(3) of the *Fisheries Act*, as applicable, prior to the affected waters being deposited in waters frequented by fish.		
3.4	The Proponent shall install hydraulic plugs in the declines before the underground mine is flooded to direct seepage from the flooded underground mine towards East Cirque Creek.	On or about 2037	On or about 2037
3.5	The Proponent shall, in a manner that complies with the *Metal Mining Effluent Regulations* and subsection 36(3) of the *Fisheries Act*, discharge water from the tailings storage facility into Attichika Creek during construction and the first year of operation such that flow rates downstream of the discharge location	September 2020, excluding 2021 as AuRico is not permitted to discharge within the year.	On or about 2030

	are within the range of minimum and maximum flow rates naturally occurring in Attichika Creek and shall only discharge water into Attichika Creek during open water months.		
3.6	The Proponent shall divert all runoff from the East Pit quarry into the tailings storage facility during construction and operation.	April 1, 2018	On or about 2035
3.7	The Proponent shall develop, prior to construction and in consultation with Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities, and implement, from the start of construction to the end of decommissioning, a follow-up program to verify the accuracy of the environmental assessment as it pertains to fish and fish habitat and to determine the effectiveness of mitigation measures referred to in conditions 3.1 to 3.6. As part of the follow-up program, the Proponent shall: 3.7.1 monitor quality of water discharged in Attichika Creek during the dewatering of the Kemess South Pit and treat that water to meet the requirements of subsection 36(3) of the *Fisheries Act*;	September 2020	End of all Project Phases

	3.7.2 monitor surface water quality in Amazay Lake and groundwater movement between the subsidence zone identified by the Proponent during the environmental assessment and Amazay Lake; 3.7.3 monitor changes in channel form and sediment load downstream of the discharge location in Attichika Creek; 3.7.4 monitor changes in water quality in Waste Rock Creek and the tailings storage facility, including changes in selenium concentrations; 3.7.5 monitor the presence and use of spawning habitat by bull trout (*Salvelinus confluentus*) and rainbow trout (*Oncorhynchus mykiss*) downstream of the discharge location in Attichika Creek prior to and after the installation of the discharge pipeline into Attichika Creek. The Proponent shall offset any loss of spawning habitat for bull trout (*Salvelinus confluentus*) and rainbow trout (*Oncorhynchus mykiss*) in Attichika Creek if monitoring results show that spawning habitat loss has occurred; and 3.7.6 monitor contaminants, including mercury, in the tissue of fish species harvested by Indigenous groups in		

	Thutade Lake, including bull trout (*Salvelinus confluentus*).		
4			
4.1	The Proponent shall carry out Designated Project activities in a manner that protects migratory birds and avoids harming, killing, or disturbing migratory birds or destroying, disturbing, or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's *Avoidance Guidelines*. The Proponent's actions in applying the *Avoidance Guidelines* shall be in compliance with the *Migratory Birds Convention Act, 1994* and with the *Species at Risk Act*.	April 1, 2018	End of all Project Phases
4.2	The Proponent shall deter migratory birds from accessing the tailings storage facility (tsf) and seepage ponds until water quality is not harmful to migratory birds.	April 1 2018	End of 2030
4.3	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures to avoid harm to	April 1 2018	End of all Project Phases

	migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 and 4.2. The Proponent shall implement the follow-up program from the start of construction to the end of decommissioning.		
5			
5.1	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to adverse effects on the health of Indigenous Peoples caused by changes in concentrations of contaminants of potential concern identified during the environmental assessment in air, soil, water, and sediment. The Proponent shall implement the follow-up program during construction and operation. As part of the development of the follow-up program, the Proponent shall: 5.1.1 identify levels of environmental change relative to established baseline conditions for contaminants of potential concern that would require the Proponent to implement modified or additional mitigation measure(s) to mitigate increased risks to human health; and	April 1, 2018	End of all Project phases

	5.1.2 if monitoring results demonstrate that concentration levels for contaminants of potential concern are greater than the identified levels of environmental change, update the human health risk assessment for the consumption of traditional foods exposed to these contaminants and communicate the results of the updated human health risk assessment to Indigenous groups.		
6	**Current use of lands and resources for traditional purposes**		
6.1	The Proponent shall install and maintain, during construction and operation, ramps every 100 to 300 metres over the discharge line between the tailing storage facility and Attichika Creek to provide passage for moose (*Alces alces*), woodland caribou (*Rangifer tarandus caribou*), grizzly bear (*Ursus arctos*), and furbearers. The Proponent shall identify the locations of ramps in consultation with Indigenous groups and relevant authorities.	April 1, 2018	On or about 2035
6.2	The Proponent shall create and maintain, during construction and operation, escape pathways along all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road, to allow ungulates to exit the plowed roads. The	April 1, 2018	On or about 2035

	Proponent shall identify the locations of escape pathways in consultation with Indigenous groups and relevant authorities.		
6.3	The Proponent shall, from the start of construction to the end of decommissioning, remove carrion within 24 hours of its discovery by the Proponent from all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road.	April 1, 2018	End of all Project Phases
6.4	The Proponent shall prohibit employees and contractors associated with the Designated Project from fishing, hunting, and trapping within the Project Area, unless an employee or a contractor is provided access by the Proponent for traditional purposes or for exercising Aboriginal rights, to the extent that such access is safe.	April 1, 2018	End of all Project Phases
6.5	The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, conduct pre-clearing surveys to identify Western toad (*Anaxyrus boreas*) breeding habitat, and shall implement measures to mitigate the loss of Western toad (*Anaxyrus*	March 15, 2018	April 1, 2018

	boreas) breeding habitat caused by the Designated Project.		
6.6	The Proponent shall conduct pre-clearing surveys to determine the distribution of little brown myotis (*Myotis lucifugus*) and Northern myotis (*Myotis septentrionalis*), and establish, in consultation with Indigenous groups and relevant authorities, buffer zones around active hibernacula and active roosts.	March 15, 2018	April 1, 2018
6.7	The Proponent shall install, prior to construction, and maintain, during construction and operation, roosting structures to offset any loss of little brown myotis (*Myotis lucifugus*) and Northern myotis (*Myotis septentrionalis*) roosting habitat.	April 1, 2018	2035
6.8	The Proponent shall develop and implement a follow-up program to monitor the little brown myotis (*Myotis lucifugus*) and Northern myotis (*Myotis septentrionalis*) usage of buffer zones and roosting structures to determine the effectiveness of the mitigation measures during construction and operation.	April 1, 2018	2035
6.9	The Proponent shall, in consultation with Indigenous groups, undertake	April 1 2017	End of all Project phases

	progressive reclamation of the habitats disturbed by the Designated Project. The Proponent shall use native species when undertaking that progressive reclamation.		
6.10	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of hoary marmot (*Marmota caligata*), white-tailed ptarmigan (*Lagopus leucura*), and short-eared owl (*Asio flammeus*) within the subsidence zone identified by the Proponent during the environmental assessment and within a buffer area of 250 metres along the limits of that subsidence zone. The Proponent shall implement the follow-up program during construction and operation.	April 1, 2018	End of all Project phases
6.11	The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the effects of changes caused by the Designated Project to the Chase herd of Southern mountain caribou (*Rangifer tarandus caribou*) and the Thudade herd	April 1, 2018	End of all Project phases

	of Northern mountain caribou (*Rangifer tarandus caribou*) on caribou hunting activities for traditional purposes and to determine the effectiveness of the mitigation measures. The Proponent shall implement the follow-up program from the start of construction to the end of decommissioning. As part of the follow-up program, the Proponent shall: 6.11.1 monitor, during construction and the first three years of operation, the use by moose (*Alces alces*), woodland caribou (*Rangifer tarandus caribou*), grizzly bear (*Ursus arctos*), and furbearers of the ramps referred to in condition 6.1 and of the escape pathways referred to in condition 6.2; and 6.11.2 monitor mortality of wildlife on all access roads associated with the Designated Project, including the northern section of the Omineca Resource Access Road.	April 1, 2018 April 1, 2018	2026 End of all project Phases
6.12	The Proponent shall provide Indigenous groups with the implementation schedule, updates, or revisions to the implementation schedule pursuant to conditions 10.1 to 10.3 at the same time the Proponent provides these documents to the Agency.	As required	

7.1	The Proponent shall, for any previously unidentified archeological structures, sites, or things of historical, archaeological, paleontological, or architectural significance discovered by the Proponent or brought to the attention of the Proponent by an Indigenous group, Gitxsan Wilp Nii Kyap, or another party during any phase of the Designated Project: 7.1.1 immediately halt work at the location of the discovery; 7.1.2 have a qualified individual conduct an assessment at the location of the discovery; 7.1.3 inform, forthwith, in writing, Indigenous groups and Gitxsan Wilp Nii Kyap of the discovery, and allow for monitoring by Indigenous groups and Gitxsan Wilp Nii Kyap during archeological work; and 7.1.4 comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring, and safekeeping of previously unidentified archeological structures, sites, or things of historical, archaeological, paleontological, or architectural significance.	April 1, 2018	End of all Project Phases

7.2	The Proponent shall not undertake any ground altering activities within 50 metres of the boundaries of archeological sites, unless authorized by relevant authorities.	April 1, 2018	End of all Project Phases
8	**Independent Environmental Monitor**		
8.1	Prior to the start of construction, the Proponent shall retain the service of an independent environmental monitor, who is a qualified individual as it pertains to environmental monitoring of mining projects in British Columbia, to observe, record, and report on the implementation of the mitigation measures set out in this Decision Statement.	April 1, 2018	End of all Project Phases
8.2	The Proponent shall give the independent environmental monitor the authority to stop Designated Project activities that do not comply with the conditions set out in this Decision Statement.	April 1, 2018	End of all Project Phases
8.3	The Proponent shall require the independent environmental monitor to prepare reports that include: 8.3.1 a description, including through photo evidence, of the Designated Project activities that occurred and the mitigation measures that were applied during the period covered by the report; and	April 1, 2018	End of all Project Phases

	8.3.2 a description, including through photo evidence, of occurrences of non-compliance related to the implementation of mitigation measures set out in this Decision Statement observed during the period covered by the report, the date of the occurrence(s) of non-compliance, whether Designated Project activities were stopped as a result of non-compliance, how the occurrence(s) of non-compliance was or were corrected by the Proponent, the date that the corrective action(s) was or were completed by the Proponent, or, if any, the status of pending occurrence(s) non-compliance that have not been corrected yet, and a description of any adverse environmental effect(s) associated with the occurrence(s) of non-compliance.		
8.4	The Proponent shall require the independent environmental monitor to retain the reports referred to in condition 8.3 until the end of decommissioning. The Proponent shall require the independent environmental monitor to provide the reports referred to in condition 8.3 to the Agency, Indigenous groups, and relevant federal authorities within 10 days of their production. If occurrence(s) of non-	April 1, 2018	End of all Project Phases

	compliance are observed by the independent environmental monitor, the Proponent shall require the independent environmental monitor to report all occurrence(s) of non-compliance directly to the Agency, Indigenous groups, and relevant federal authorities immediately.		
9			
9.1	The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.	April 1, 2017	End of all Project Phases
9.2	The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.	March 13, 2017	End of all Project phases
9.3	The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an emergency response plan in relation to the Designated Project.	March 13, 2017	On or about April 1, 2018
9.4	In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall implement the emergency response plan referred to in condition 9.3 and shall:	April 1, 2018	End of All Project phases

	9.4.1 notify Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities of the accident or malfunction as soon as possible, and notify the Agency in writing; 9.4.2 implement immediate measures to mitigate any adverse environmental effects associated with the accident or malfunction; 9.4.3 submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction took place. The written report shall include: 9.4.3.1 a description of the accident or malfunction and of its adverse environmental effects; 9.4.3.2 the measures that were taken by the Proponent to mitigate the adverse environmental effects of the accident or malfunction; 9.4.3.3 any views received from Indigenous groups, Gitxsan Wilp Nii Kyap, and relevant authorities with respect to the accident or malfunction, its adverse environmental effects, and measures taken by the Proponent to mitigate adverse environmental effects;		

	9.4.3.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; 9.4.3.5 details concerning the implementation of the emergency response plan referred to in condition 9.3; and 9.4.4 submit a written report to the Agency, no later than 90 days after the day on which the accident or malfunction took place, on the changes made to avoid a subsequent occurrence of the accident or malfunction, and on the implementation of any modified or additional measures to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information in the written report submitted pursuant to condition 9.4.3.		
9.5	The Proponent shall develop and implement a communication plan in consultation with Indigenous groups and Gitxsan Wilp Nii Kyap. The Proponent shall develop the communication plan prior to construction and shall implement and maintain it up to date from the start of construction to the end of	March 13, 2017	April 1, 2018

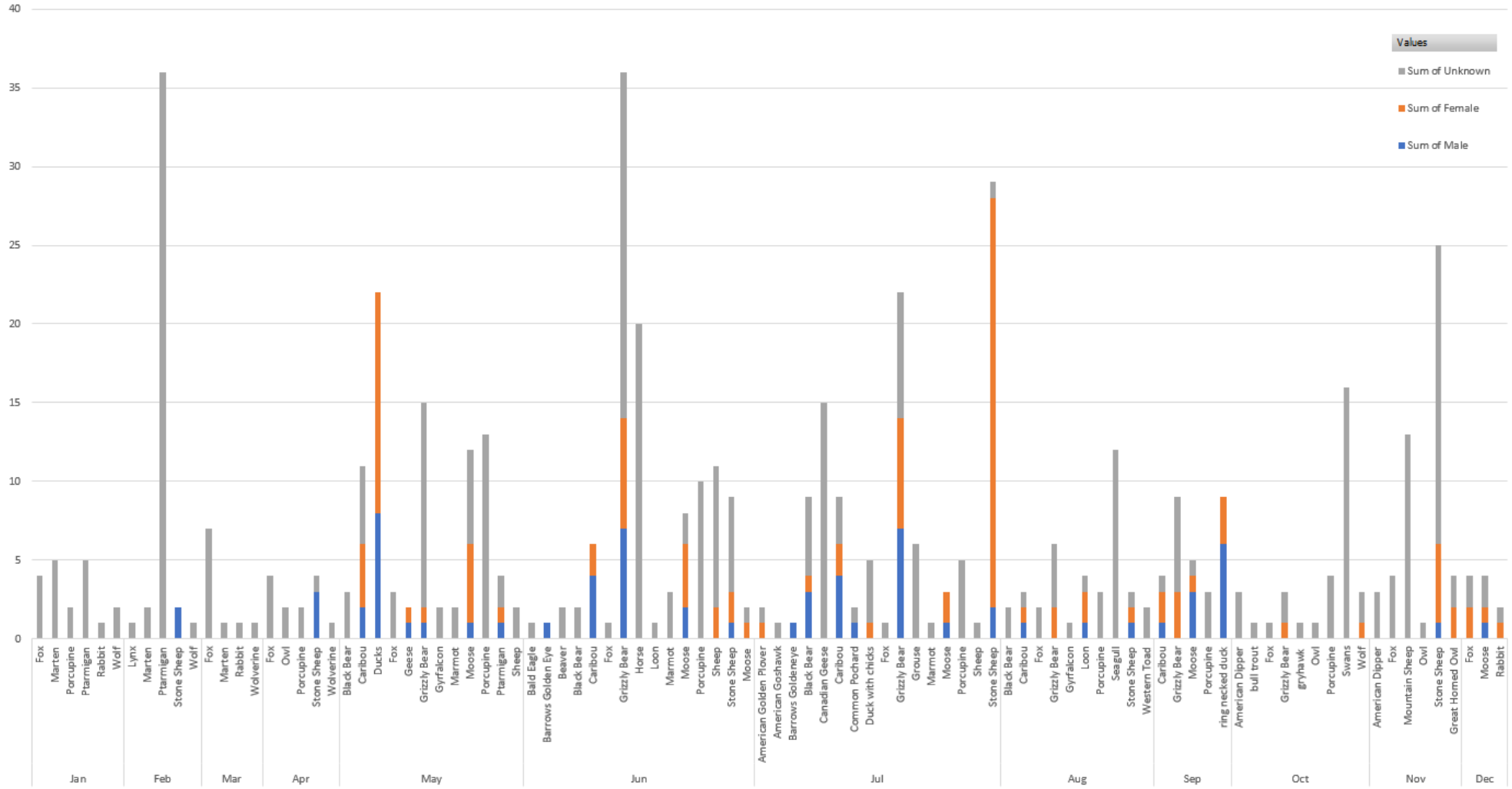
	decommissioning. The plan shall include: 9.5.1 the types of accidents and malfunctions requiring the Proponent to notify the respective Indigenous groups and Gitxsan Wilp Nii Kyap; 9.5.2 the manner by which Indigenous groups and Gitxsan Wilp Nii Kyap shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups and Gitxsan Wilp Nii Kyap to assist in the response to the accident or malfunction; and 9.5.3 the contact information of the representatives of the Proponent that the Indigenous groups and Gitxsan Wilp Nii Kyap may contact and of the representatives of the respective Indigenous groups and Gitxsan Wilp Nii Kyap to which the Proponent provides notification.		
10	**Implementation schedule**		
10.1	The Proponent shall submit an implementation schedule for conditions contained in this Decision Statement to the Agency at least 30 days prior to the start of construction. The implementation schedule shall indicate the commencement and completion dates for each activity	March 3, 2018	March 31, 2018

	relating to conditions set out in this Decision Statement.		
10.2	The Proponent shall submit an update to this implementation schedule in writing to the Agency every two years on or before March 31, until completion of the activities.	2025	End of all phases of Project
10.3	The Proponent shall provide the Agency with a revised implementation schedule if any material change(s) occur from the initial schedule referred to in condition 10.1 or any subsequent update(s). The Proponent shall provide the revised implementation schedule at least 30 days prior to the implementation of the change.	As required	End of all phases of Project
11			
11.1	The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement, including any records that the Agency considers relevant. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.	March 13, 2017	End of all phases of Project
11.2	The Proponent shall retain all records referred to in condition 11.1 at a facility	March 13, 2017	End of all phases of Project

	in Canada. The records shall be retained and made available throughout construction and operation and until the end of decommissioning. 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 the address of the new location.		

APPENDIX B

Wildlife Sightings at Kemess Mine and on the Omineca Resource Access Road (ORAR)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35
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Values
Sum of Unknown
Sum of Female
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Fox
Marten
Porcupine
Ptarmigan
Rabbit
Wolf
Lynx
Marten
Ptarmigan
Stone Sheep
Wolf
Fox
Marten
Rabbit
Wolverine
Fox
Owl
Porcupine
Stone Sheep
Wolverine
Black Bear
Caribou
Ducks
Fox
Geese
Grizzly Bear
Gyrfalcon
Marmot
Moose
Porcupine
Ptarmigan
Sheep
Bald Eagle
Barrows Golden Eye
Beaver
Black Bear
Caribou
Fox
Grizzly Bear
Horse
Loon
Marmot
Moose
Porcupine
Sheep
Stone Sheep
Moose
American Golden Plover
American Goshawk
Barrows Goldeneye
Black Bear
Canadian Geese
Caribou
Common Pochard
Duck with chicks
Fox
Grizzly Bear
Grouse
Marmot
Moose
Porcupine
Sheep
Stone Sheep
Black Bear
Caribou
Fox
Grizzly Bear
Gyrfalcon
Loon
Porcupine
Seagull
Stone Sheep
Western Toad
Caribou
Grizzly Bear
Moose
Porcupine
ring necked duck
American Dipper
bull trout
Fox
Grizzly Bear
gryhawk
Owl
Porcupine
Swans
Wolf
American Dipper
Fox
Mountain Sheep
Owl
Stone Sheep
Great Horned Owl
Fox
Moose
Rabbit
Jan
Feb
Mar
Apr
May
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Sep
Oct
Nov
Dec

APPENDIX C

Kemess Crossing Report 2025

ECOFOR

Structure Installations for Crossing Sites at Kitchen Creek, Nugget Creek and KN003 at the Kemess North Exploration Site

Prepared for:

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Prepared by:

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ACKNOWLEDGEMENTS AND PERSONNEL

Report Title:	2025 Crossing Installation Project - Kemess North Exploration Site
Report Date:	December 15, 2025
EPN:	25-2412-001
Prepared By:	**Ecofor Consulting Ltd.** 140 Stuart Dr. West Fort St. James, BC V0J 1P0
Prepared For:	**Centerra Gold Services Inc.** 1 University Ave, Suite 1500 Toronto, ON M4J 2P1
Project Manager:	Kevin Wilson, RPF, RPBio
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Field Personnel:	Kevin Wilson, RPF, RPBio Sean Houghton, Environmental Tech

TABLE OF CONTENTS

1 INTRODUCTION

Centerra Gold Services Inc. is undertaking exploration activities on a claim adjacent Kemess Mine Northeast of Thutade Lake in the Omineca Mountains in North central BC. Planned exploration activities within the Kemess expansion claim requires the installation of temporary crossings on two unnamed watercourses. Ecofor Consulting Ltd. (Ecofor) was retained to install three watercourses crossing structures to support the 2025 exploration program and the Kemess North site. Two of the crossing sites were assessed for fisheries values in 2024; Kitchen Creek which was identified as a Non-Classified Drainage (NCD) along the proposed crossing reach and Nugget Creek which was classified as an S5 watercourse along the crossing reach. The third crossing site KN003 was identified as a Non-Fish Bearing Non-Classified Drainage (NCD), (Figure 1). Crossing structures were installed at the three crossing sites in July 2025, to facilitate access to plan exploration target sites within the Project footprint area.

1.1 Project Location

The Kemess exploration Project is located approximately 430 km northwest of Prince George in north central British Columbia (Figure 1). The Project site can be accessed by truck by traveling north from Prince George along Hwy 97 to Mackenzie Junction then Northeast through a series of forest service roads to the historic Kemess Mine Site. The three crossing locations were accessed via 4x 4 truck and helicopter from the existing Mine Site camp and were located east of Amazay Lake (Duncan Lake).

1.2 Purpose of This Report

The following report provides a summary of the crossing installation activities at each of the three sites and mitigation measures implemented to protect water quality in the streams and minimize sediment and erosion risks at each site.

2 METHODS

Each of the three crossings were field reviewed by a Qualified Environmental Professional (QEP) July 7-8, 2025, to evaluate stream flow conditions and prescribe an appropriate crossing structure plan for each site. The QEP crew oversaw the installation of the crossing structures at Kitchen Creek and Nugget Creek and provided recommended crossing plan for crossing KN003.

At each of the sites an appropriately size culvert was chosen to facilitate unrestricted water flow at each of the sites and sediment and erosion control measures were prescribed to stabilize the structures and minimize risk of sediment delivery downstream of the crossings. At Kitchen and Nugget Creeks measures were implemented to allow the structures to remain over the winter. At crossing KN003 the crossing was designed to be temporary and pulled at the end of the 2025 exploration program.

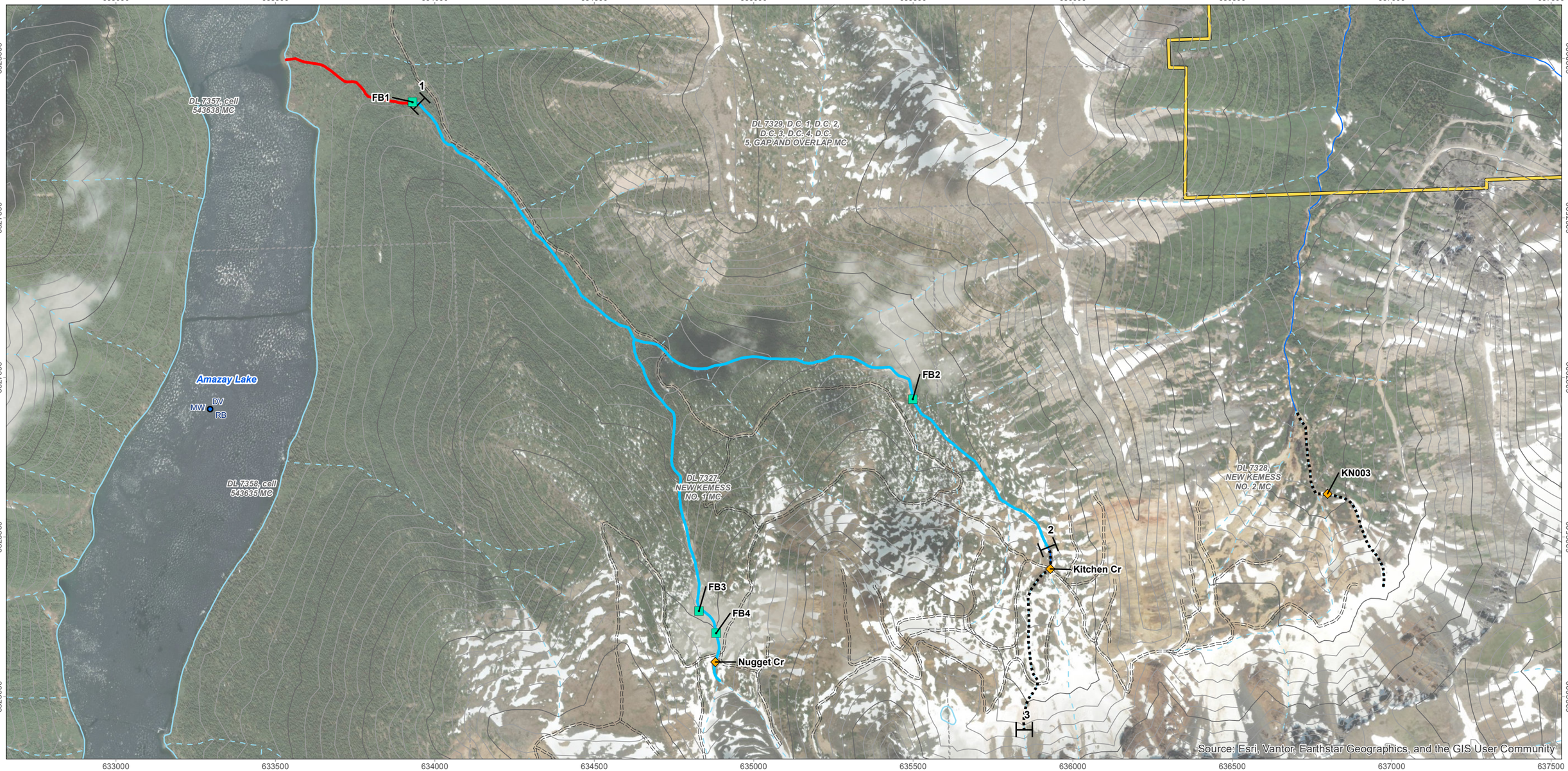


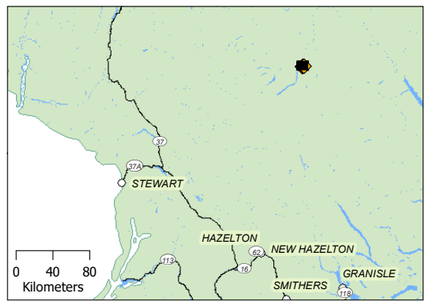
Figure 1
Location of the 2025 Kemess North Claim Crossing Installation Sites (Nugget Creek, Kitchen Creek & KN003)

N

1:12,000

0 200 400 600m

NAD 1983 UTM Zone 9N



- Creek Crossing
- Full Barrier
- Reach Break
- Fish Observation
- Non-Classified Drainage (NCD)
- S3 Fish Bearing
- S5 Non-Fish Bearing
- Road
- Contour (100m)
- Contour (20m)
- Stream - Definite
- Stream - Intermittent
- Waterbody
- Claim Area

Fish Species

MW - Mountain Whitefish
DV - Dolly Varden
RB - Rainbow Trout

Disclaimer:
This product is for informational purposes only and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. The base data layers have been obtained from the British Columbia Geographic Warehouse (BCGW)

centerraGOLD

ECOFOR

Ecofor Consulting Ltd. Date: January 2, 2026 (JM)

Document Path: G:\GIS_PROJECTS\2024\Natural Resources\Centerra Mt Milligan\MXD\Kemess_StreamCrossing.mxd

3 CROSSING ASSESSMENTS

A total of three watercourse crossing locations were surveyed during the field review at the Kemess North Project site in July 2025 (Figure 1). Table 1 provides a list of the crossings and the crossing methods prescribed for the sites.

Table 1. **Crossing Locations within the Kemess Exploration Tenure.**

Crossing ID	Stream Class	UTM Location	Crossing Structure	Comments
KN001/ Kitchen Creek	NCD – Non-Classified Drainage (Non-Fish Bearing)	09 635930 6326400	Round Culvert 900mm	**Watercourse at the proposed crossing has been identified as a Non-Classified Drainage (NCD) in this reach. A 900mm round plastic culvert installed to maintain water flow across the crossing and to ensure sedimentation not the downstream stream reaches is avoided. Inflow and outflow armouring with large riprap to allow for crossing structure to remain in place over the winter. Inspection to assess integrity of the crossing in the spring / early summer of 2026 will be required.**
KN002/Nugget Creek	S5 (Non-Fish Bearing)	09 634880 6326109	2 x Round Culvert 900mm	**Watercourse at the proposed crossing has been identified as an S5 non fish bearing stream at this reach. Two 900mm round plastic culverts installed to maintain water flow across the crossing and to ensure sedimentation not the downstream stream reaches is avoided. Inflow and outflow armouring with large riprap to allow for crossing structure to remain in place over the winter. Inspection to assess integrity of the crossing in the spring / early summer of 2026 will be required.**
KN003	NCD – Non-Classified Drainage (Non-Fish Bearing)	09 636798 6326635	Round Culvert 600mm	**Temporary crossing was established during July site visit at the recommendation of site QEP. and supervised by Ecofor QEP. A 600mm round plastic culvert was installed the location to allow for temporary crossing. Structure was pulled at the end of the exploration season in September 2025.**

4 SITE ASSESSMENT METHODS

The methods employed to classify stream reaches followed standards and guidelines provided by the Forest Practices Code (FPC), the Forest and Range Practices Act (FRPA), the Resources Information Standards Committee (RISC), and the former BC Watershed Restoration program. Existing local and regional information was compiled by conducting a desktop assessment of background information on streams and riparian habitat values in the vicinity of the proposed Project. Standards, guidelines and information sources included:

- FPC Riparian Management Area Guidebook (Province of BC, 1995)
- FPC Fish Stream ID Guidebook (Province of BC, 1998)
- FPC Fish Stream Crossing Guidebook (Province of BC, 2012)
- RISC Reconnaissance (1:20,000) Fish and Fish Habitat Inventory: Standards and Procedures (BC, 2001)
- RISC Standards for Fish and Fish Habitat Maps (Province of BC, 2001)
- RISC Guide to Photo documentation for Aquatic Inventory (Province of BC, 1996)
- Standard Procedures for Line and Polygon Mapping using Global Positioning Systems Technology (MoF)
- Fish Collection Methods and Standards (Province of BC, 1997)
- Procedures and Guidelines for Operational Forest Resource Survey and Mapping Using Global Positioning System Technology (Ministry of Forests, 2001)
- BC Habitat Wizard

5 RESULTS AND DISCUSSION

Crossing KN001 and KN002 were classified in 2024 and KN003 was classified in 2025, and the results are presented below. None of the crossings were on fish bearing streams and as a result culverts crossing structures were prescribed for the three crossing sites.

5.1 Watercourse Classification

Stream classification was based on channel width, bed definition, channel continuity, and signs of scouring. In addition, streams were assessed to see if they were fish bearing on non fish bearing systems. Table 3 presents the stream classification for the 3 crossing sites associated with the 2025 Kemess North Exploration Project.

Table 2. Summary of Surveyed Watercourses

Ecofor Field Number	Watercourse Name	UTM Coordinate	Ecofor Stream Class	Fish Habitat Rank
KN001 R2	Kitchen Cr	Zone 09U 635922.6326468	S5	Nil
KN001 R3	Kitchen Cr	Zone 09U 635848.6325897	NCD	Nil
KN002	Nugget Cr	Zone 09U 634880.6326109	S5	Nil
KN003	Unnamed	Zone 09U 636798.6326635	NCD	Nil

5.2 Crossing KN001(Kitchen Creek)

Crossing KN001 (UTM 09 635930 E 63264000 N) is located on a high gradient watercourse that flows from the alpine down to Amazay Lake (Figure 1). The watercourse was broken out into three reaches; reach 1 (R1) is the first 500m of the stream that feeds into Amazay Lake and was classified as a S3 fish stream. Reach 2 is an S5 non fish bearing reach that begins at the first full barrier to fish on the system (FB2) and extends uphill for 2.4km to reach break 2 (Figure 1). Reach 3 has been classified as a Non-Classified Drainage (NCD) and extends uphill from reach break 2 across the proposed crossing KN001 to the end of the drainage at reach break 3 (Figure 1). The proposed crossing location is located on reach 3 which is a Non-Classified Drainage (NCD). No continuous channel bed or deposited mineral alluvium were found within 50 m upstream or downstream of the crossing. Multiple braided channels with overland flow and discontinuous scour and channelization above the crossing location. This water feature does not meet the definition of a stream, fish habitat is not present, and fish will not utilize the crossing location.

5.2.1 Crossing Structure Installation

The presence of full barriers downstream of the crossing location at reach break 1 preclude any fish habitat use of reach 2 and 3 of this waterbody. No fish and fish habitat values associate with the NCD at the proposed crossing KN001. An adequately sized round culvert will meet the requirements for a crossing structure at this site.

Plate 001: Crossing conditions July 2025 at Kitchen Cr (KN001).

Plate 002: Site prep for structure installation and site KN001.

Plate 003: Site prep for structure installation at crossing KN001.

Plate 004: Geofabric and riprap armouring at inflow if crossing site KN001.

Plate 005: Riprap armouring at outflow of crossing at KN001.

Plate 006: Completed crossing installation of 900mm culvert at site KN001.

Plate 006: Photo KW007- Stream habitat below proposed crossing. Gradient and velocity barrier site FB1.

Plate 007: Geofabric installation at inflow of 900mm culvert at site KN001.

Plate 008: Photo KW009- Full barrier, 10m falls, full barrier to upstream fish passage at FB2, approximately 500m upstream of Amazay Lake.

Plate 008: Geofabric installation at inflow of 900mm culvert at site KN001.

5.2.2 Crossing Technique

The crossing will require an adequately size culvert (900mm) to maintain flow across the road. The crossing is on a NCD section of the watercourse; however, it feeds directly into a S5 stream below the crossing and will require the management of potential sediment delivery to the downstream reaches. Dewatering of the crossing should be done prior to excavation and installation of the culvert to minimise sediment delivery to the downstream reaches. Crossing deactivation at the end of the exploration season will be required to remove the culvert and reestablish natural water flow across the trail crossing.

The Ecofor QEP designed and implemented the installation of a temporary crossing while on site during the July 8-9 site visit. The QEP worked with the excavator and operator to isolate the stream at the crossing and install a 900mm plastic round culvert at the site (Plate 1-8). Once the culvert was installed to grade the water in the isolation berm was slowly released to minimize siltation deliver to the downstream reach.

The confined nature of the stream channel and the large substrate bed material made the isolation and installation of the culvert a relativity easy installation. No major concerns were note with the crossing installation and the QEP on site was there to monitor sedimentation delivery to the stream and ensure crossing structure was installed to grade and was adequate to handle the flow across the crossing.

The culvert was armoured with large riprap at the inlet and outlet to the crossing (Plate 4-6). The armouring was placed at site was installed to stabilize the crossing as the intent is to leave the culvert in over the winter. The crossing site will be inspected in the spring / early summer at the start of the 2026 exploration program, to ensure its integrity and evaluate and sediment and erosion risk. Mitigation measures will be implemented to ensure crossing integrity and water quality is maintained at the site throughout the 2026 exploration season

5.2.3 Permitting Requirements

The watercourse at the proposed crossing KN001 does not meet the definition of a stream and will not require and formal permitting to establish a crossing structure.

5.2.4 Mitigation Measures

To ensure that there is no serious harm to fish in downstream reaches, the following mitigation measures must take place:

General

- The crossing shall occur at the specific location identified.
- The machinery used in construction shall be free of excessive oil or grease.
- The machinery shall be inspected by the operator to check for any leaks or indications of hoses that may be vulnerable and ready to leak.
- The machinery shall run an environmentally friendly, bio-degradable hydraulic oil in the lines.

Access Protection

- The contractor shall implement measures to minimize disturbance to of the road fill and ditch lines at the crossing to minimize sediment delivery risk into the drainage and downstream watercourse.

Restoration

- Disturbed areas shall be stabilized and restored after the crossing.
- Native grass seeding shall be completed for areas of disturbed soils.
- Silt fence or other sediment and erosion control measures to be installed if required.

5.2.5 Environmental Monitoring

- The contractor's QEP shall be available to monitor construction works as needed, with higher effort during more sensitive stages of the work such as during any water flow isolation and culvert installation.

5.3 Crossing KN002 (Nugget Creek)

The stream at crossing KN002 (UTM 09 634880E 6326109N) is within steep gradient S5 stream in a confined gully that runs from the alpine down the slope where it drains into stream KN001(Figure 1). Stream KN002 feeds into stream KN001 above the identified fish passage barrier (FB1), (Figure 1). As such KN002 has been identified as a non fish bearing stream with no fish and fish habitat value.

The proposed crossing location is located on reach 1 which is an S5 non fish bearing stream with coarse substrate and very low sediment delivery risk. A standard round culvert structure will be adequate to manage risk at the crossing and ensure stream flow is maintained. The presence of full barriers downstream of the crossing location at reach break 1 on stream KN001 preclude any fish habitat use of stream KN002. No fish and fish habitat values associate with this S5 stream.

5.3.1 Crossing Structure Installation

The presence of full barriers downstream of the crossing location at reach break 1 along Kitchen Creek precludes any fish habitat use of this stream. No fish and fish habitat values associate with the S5 stream at the proposed crossing KN002. An adequately sized round culvert will meet the requirements for a crossing structure at this site. The braided nature of the stream above the road crossing requires that two 900mm culverts be installed at the site. The eastern culvert (Plate 9) is to address a lower flow braid of the main channel, and the western culvert is to address the main flow of the stream (Plate 11).

Plate 009: Culvert 1 at site KN002.

Plate 010: Completed works at crossing site KN002.

Plate 011: Culvert 2 inflow at crossing site KN002 with riprap armouring placement.

Plate 012: Culvert 2 inflow at crossing site KN002 with riprap armouring placement.

Plate 013: Culvert 2 outflow at crossing site KN002 with riprap armouring placement.

Plate 014: Culvert 2 inflow at crossing site KN002 with riprap armouring placement.

5.3.2 Crossing Technique

The Ecofor QEP designed and implemented the installation of a temporary crossing while on site during the July 8-9 site visit. The QEP worked with the excavator and operator to isolate the stream at the crossing and install two 900mm plastic round culverts at the site (Plate 9 to 14). Once the culverts were installed to grade the water in the isolation berm was slowly released to minimize siltation deliver to the downstream reach.

The confined nature of the stream channel and the large substrate bed material made the isolation and installation of the culvert a relativity easy installation. No major concerns were note with the crossing installation and the QEP on site was there to monitor sedimentation delivery to the stream and ensure crossing structure was installed to grade and was adequate to handle the flow across the crossing.

The main culvert (west) which takes most of the water flow at the site, was armoured with large riprap at the inlet and outlets to the crossing, (Plate 10-12). The armouring was placed at site was installed to stabilize the crossing as the intent is to leave the culvert in over the winter. The crossing site will be inspected in the spring / early summer at the start of the 2026 exploration program, to ensure its integrity and evaluate and sediment and erosion risk. Mitigation measures will be implemented to ensure crossing integrity and water quality is maintained at the site throughout the 2026 exploration season.

Permitting Requirements

The watercourse at the proposed crossing KN002 is not fish bearing and no additional permitting required to complete the installation. The crossing installation is allowed under the existing Exploration permit for the Project.

5.3.3 Mitigation Measures

The QEP implemented the following measures to ensure no major sediment delivery to the S5 stream and to or harm to downstream fish and fish habitat:

General

- The crossing shall occur at the specific location identified.
- The machinery used in construction shall be free of excessive oil or grease.
- The machinery shall be inspected by the operator to check for any leaks or indications of hoses that may be vulnerable and ready to leak.
- The machinery shall run an environmentally friendly, bio-degradable hydraulic oil in the lines.

Access Protection

- The contractor shall implement measures to minimize disturbance to the banks, bars, bed, side channels, and other features within the stream bed along the crossing.

Restoration

- Disturbed areas shall be stabilized and restored after the crossing structure is removed.
- Native grass seeding shall be completed for areas of disturbed soils.
- Silt fence or other sediment and erosion control measures to be installed if required.

5.3.4 Environmental Monitoring

- The contractor's QEP was on siter isolation and installation of the culvert.

5.4 Crossing KN003 Unnamed Drainage

Crossing KN003 (UTM 09 636798 E 6326635 N) is located on a high gradient watercourse that flows from the alpine down to Amazay Lake (Figure 1). The watercourse is high elevation intermittent stream with no fisheries values. During the July 2025 site visit the watercourse was classified by Ecofor QEP as a Non-Classified Drainage (NCD),(Figure 1).

The proposed crossing location is a Non-Classified Drainage (NCD). Overland flow and discontinuous scour and channelization above and below the crossing location. This water feature does not meet the definition of a stream, fish habitat is not present, and fish will not utilize the crossing location (Plate 15-16).

5.4.1 Crossing Structure Installation

The presence of full gradient barriers downstream of the crossing location at KN003 preclude any fish habitat use of this waterbody. No fish and fish habitat values associate with the NCD at the proposed crossing KN003. An adequately sized round culvert will meet the requirements for a crossing structure at this site.

Crossing Technique

The crossing will require an adequately size culvert (600-800mm) to maintain flow across the road. The crossing is on a NCD section of the watercourse; however, it feeds into a S5 stream downstream of the crossing and will require the management of potential sediment delivery to the downstream reaches. Dewatering of the crossing should be done prior to excavation and installation of the culvert to minimise sediment delivery to the downstream reaches. Crossing deactivation at the end of the exploration season will be required to remove the culvert and reestablish natural water flow across the trail crossing.

The Ecofor QEP designed and implemented the installation of a temporary crossing for the site. Field work was conducted by exploration team under the direction of the QEP. An excavator and operator installed a temporary 600mm plastic round culvert at the site (Plate 17-18). Once the culverts were installed to grade the water in the isolation berm was slowly released to minimize siltation deliver to the downstream reach.

The temporary culvert was installed over a liner of geofabric to help stabilize the crossing and minimize sediment and erosion risk at the crossing (Plate 17-18). No excavation of the drainage was required, the culvert and road fill were placed on top of a layer of geofabric, and no excavation of the drainage channel was required.

The confined nature of the stream channel and the large substrate bed material made the isolation and installation of the culvert a relativity easy installation. No major concerns were note with the crossing installation. The final crossing structure (Plate 19-20) was pulled out in September 2025 at the end of the exploration program, and the natural channel flow was reestablished.

Plate 015: Small NCD/intermittent stream reach at high elevation. No fish habitat values in this steep reach.

Plate 016: NCD at crossing KN003, gradients of >50 % just downstream of crossing.

Plate 017: Installation of geofabric at temporary crossing KN003.

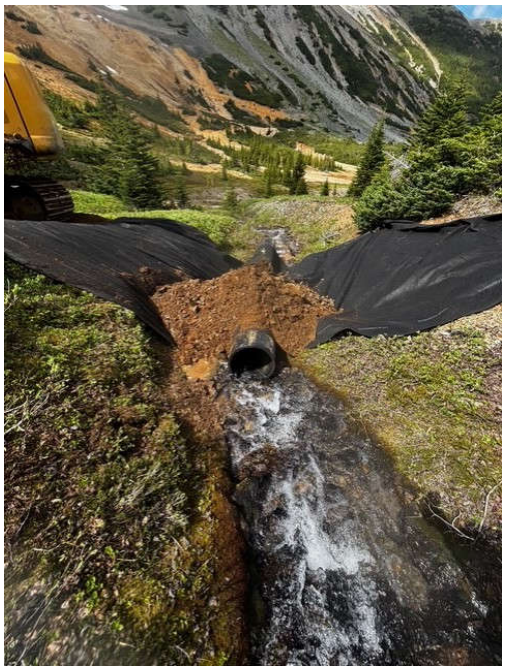


Plate 018: Installation of geofabric and 600mm round plastic culvert at temporary crossing KN003.

Plate 019: Final installation of temporary crossing at KN003.

Plate 020: Final installation of temporary crossing at KN003.

5.4.2 Permitting Requirements

The watercourse at the proposed crossing KN003 does not meet the definition of a stream and will not require and formal permitting to establish a crossing structure.

5.4.3 Mitigation Measures

To ensure that there is no serious harm to fish in downstream reaches, the following mitigation measures must take place:

General

- The crossing shall occur at the specific location identified.
- The machinery used in construction shall be free of excessive oil or grease.
- The machinery shall be inspected by the operator to check for any leaks or indications of hoses that may be vulnerable and ready to leak.
- The machinery shall run an environmentally friendly, bio-degradable hydraulic oil in the lines.

Access Protection

- The contractor shall implement measures to minimize disturbance to of the road fill and ditch lines at the crossing to minimize sediment delivery risk into the drainage and downstream watercourse.

Restoration

- Disturbed areas shall be stabilized and restored after the crossing.
- Native grass seeding shall be completed for areas of disturbed soils.
- Silt fence or other sediment and erosion control measures to be installed if required.

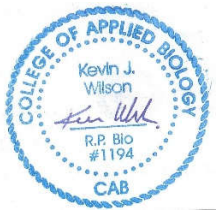
5.4.4 Environmental Monitoring

- The contractor's QEP provided construction plan for the crossing installation.

6 CLOSURE

We trust the information provided meets the requirements to support your reporting requirements for the Kemess North exploration Project. Should you require any additional information feel free to contact me.

Sincerely,



Kevin J Wilson, RPF, RPBio, Pbiol
Ecofor Consulting BC Ltd

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