KUDZ ZE KAYAH PROJECT

SPILL CONTINGENCY PLAN

REV 04

June 2026

BMC MINERALS LTD.

This Management Plan has been developed to meet the appropriate subject objectives based on existing regulatory requirements, current or planned site activities, existing and expected site conditions, and designed outcomes at the time of writing. Operational processes/practices for achievement of licence terms and conditions may be updated from time to time as appropriate due to changes to relevant legislation and regulations, changes to site activities or conditions, differences from expected objective outcomes, or improvement of management practices. All rates, capacities, dimensions, weights, volumes and durations in text or figures are based on current feasibility level designs and are subject to change based on final design, licence conditions or site conditions encountered. Updates will be resubmitted to government authorities and/or stakeholders as required.

LIST OF REVISIONS

Issue Date	Revision Number	Description
August 28, 2020	Rev 00	For Issue to Agencies
November 19, 2020	Rev 01	Updated with commitments and Final Screening Report Recommendations
July 18, 2022	Rev 02	Updated with edits from BMC final review
December 20, 2023	Rev 03	Updated with responses to Interventions on the Type A Water Licence Application & Updated in response to Phase 2/3 IR from EMR dated May 5, 2023
June 1, 2026	Rev 04	Administrative updates in response to EMR completeness check

SUMMARY OF REVISIONS

Information Request/Intervention	Document	Section	Revision
Revision 03			
EMR Phase 2/3 IR A concordance table is missing from the plan. BMC is to provide a concordance table that demonstrates how all applicable decision document terms and conditions and proponent commitments have been addressed. This concordance table should also indicate where revisions have been made based upon the information requests outlined in this table.	Spill Contingency Plan	n/a	Added Table of Revisions and Table of Concordance
EMR Phase 2/3 IR Section 3.2: Spill Classification The duty to mitigate and remediate is not tied to reportable quantities. There is sometimes a misconception that if a spill is below the reportable quantity that no further action is required. This is incorrect, as per the CSR, any spill of a contaminant must be remediated, even if it's below reportable quantities. An example of this potential misinterpretation is in Figure 3-1. The flow chart directs the reader to: "determine if spill is reportable" -> "no" -> "internal investigation and correct action". This process is incorrect as presented. The workflow should include an additional step, specifically, "remediate spill area". Add section, sub-section, or paragraph (as appropriate) to acknowledge that remediation will be completed regardless of whether a spill is of reportable quantity.	Spill Contingency Plan	3.2.1	Flow chart in Fig 3-1 modified to show that spill is cleaned up regardless of whether it is reportable to external authorities or not. This requirement is also detailed in Section 3.3, which is referenced in the text in Section 3.2.
EMR Phase 2/3 IR Section 3: Item 3.5 - Clean-up Procedures The spill response procedures do not include any specifics regarding remediation, nor reference to the contaminated sites regulations or protocols (for example: “Protocol No. 3 - Soil Sampling Procedures at Contaminated Sites” and CSR “Protocol 5 - Petroleum Hydrocarbon Analytical Methods and Standards”). There is no specific direction regarding confirmatory sampling and reporting nor that it must be done in accordance with CSR and all relevant protocols. Include specifics regarding remediation and reference the contaminated site regulations and protocols in the spill response procedures. Standard Operating Procedures appended to the plan would also support this request.	Spill Contingency Plan	3.5	Text referencing CSR and protocols added. Also noted that contaminated soils will be remediated in the Land Treatment Facility. Soil Remediation and Confirmatory Soil Sampling Following a Spill Procedure added to Appendix C.
EMR Phase 2/3 IR Section 3: Item 3.5 - Clean-up Procedures The plan states "The Site Environmental Department will determine when all	Spill Contingency Plan	3.5	Added the following text “*All spills and contaminated materials will be managed in compliance with the Yukon Spills Regulations (YG, 1996), Yukon Contaminated Site Regulations (YG, 2002) and Contaminated Sites*

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contaminated material has been adequately removed" in regard to spill in both soil and water. It is true that the site environmental department is responsible for direction of remedial strategy/extent. However, final determination of completion of remediation will be made by Environmental Protection and Assessment Branch, following the review of a submitted remedial report. There is no reference to report submission to Yukon Government, or any other process beyond the internal department. Adjust language to ensure the final determination of completion of remediation will be made by Environmental Protection and Assessment Branch, following review of a submitted remedial report to appropriate governing bodies.			*Regulation Protocols (see www.yukon.ca/en/waste-and-recycling/contaminated-sites/managing-contaminated-site).* *Any remediation work that may be required following a spill will be carried out by a qualified professional and done in accordance with the Yukon CSR and the Soil Remediation and Confirmatory Soil Sampling Following a Spill Procedure in Appendix C. Any reporting and/or analytical results that are produced as part of remediation efforts will be made available to YG upon request."*
EMR Phase 2/3 IR Section 4: Item 4.2 - External Reporting It is a requirement within the Workers' Safety and Compensation Act that a major release of a hazardous substance must be reported to the Workers' Safety and Compensation Board. (Part 3, Section 57 of Workers' Safety and Compensation Act) BMC to acknowledge the comment with revised wording.	Spill Contingency Plan	4.2	Text added "*In addition to this, in the event of a major release of a hazardous substance, a separate report will be made to the Workers' Safety and Compensation Board, in accordance with the Yukon Workers' Safety and Compensation Act (YG, 2021).*"
LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf Glossary: A distinction is made between "Spills" and "Reportable Spills," with the latter being those of type and volume specified in the Yukon Spills Regulation. Volumes of up to 200L of material are exempt from reporting under the Regulation. Depending on season and location, this volume may cause significant effects. Kaska have their own Indigenous governments and, as such, are de facto regulators within their own lands. The volumes in the Spills Regulation may not be sufficiently conservative to protect LFN's interests. ALL spills must be reported to Kaska Governments, whether or not they must be reported to Yukon.	Spill Contingency Plan	4.1	Added reference to Section 4.1 for recording requirements of database.
		4.1	Added details of log book records that will be kept for all spills, regardless of whether above reportable quantities under the Yukon *Spills Regulations*. Noted that the log book records will be included in annual reporting per the licence requirements and will be publicly available on EMR and Water Board's respective websites.
		4.2	Added text on BMC's proposal to establish a stand alone Environmental Management Advisory Committee under the modernized Socio-economic Participation Agreement. The committee will be tasked with, among other things, reviewing and providing input into environmental management plans, reporting on implementation of those plans, reviewing monitoring plans/results, and reviewing incident reports and reporting back to Kaska members.
LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf Purpose: The document references spill-related reporting but does not provide a clear schedule for doing so, nor does it indicate to whom those reports will be made available and how. A list of planned reporting (regular and emergency) and a schedule and distribution list for these reports must be included.	Spill Contingency Plan	4.1	The log book record of all spill occurrences (regardless of whether above reportable quantities under the Yukon *Spills Regulations*) will be included in annual reporting per the licence requirements.
		4.2	Plan already noted the following (no edits made): "Spills that exceed the reportable thresholds set by the Yukon *Spills Regulations* will be reported to the Yukon Spill Report Line within 24 hours of discovery of a reportable spill. BMC will also contact Kaska, Department of Energy, Mines and Resources and the Water Board via email or phone

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			to separately advise of the reportable spill. A detailed written report will subsequently be prepared and submitted to the regulatory authorities within 10 days following the event". Added text on BMC's proposal to establish a stand alone Environmental Management Advisory Committee under the modernized Socio-economic Participation Agreement. The committee will be tasked with, among other things, reviewing and providing input into environmental management plans, reporting on implementation of those plans, reviewing monitoring plans/results, and reviewing incident reports and reporting back to Kaska members.
LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf Roles and Responsibilities: Several BMC Departments are noted as having post-spill responsibilities. Noticeably absent is a reference to implementing remediation and restoration and monitoring restoration success. Please indicate where the responsibility lies both for restoration and monitoring to ensure restoration endpoints are met	Spill Contingency Plan	Figure 3-1	Added "Implement remediation and restoration of the impacted area, with guidance from the Environmental Department" to responsibilities for Line Supervisor. Added "Monitor sites that have been remediated to assess success of remediation efforts" to responsibilities for Environmental Department.
LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf Site Operational Spills: The Spill Contingency Plan recommends the use of snow berms to contain spills; while this could be appropriate, additional instructions should be provided for the safe management of contaminated snow. If improperly handled (e.g., if bags or bins referenced in the Spill Contingency Plan are not watertight), leaking meltwater can result in significant remobilization and spread of the contaminants associated with the original spill. Guidance on proper management and decommissioning of snow berms used to contain spills must be included in the Spill Contingency Plan	Spill Contingency Plan	3.5.1.2	Text updated to state that contaminated snow or ice is to be placed in a watertight disposal bag or bin for transportation, and that the transportation vessels are to be monitored to verify that meltwater does not escape from the vessels prior to disposal in the Waste Management Facility.
LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf The Spill Contingency Plan notes that "the site Environmental Department will determine when all contaminated material has been adequately removed." It is inappropriate to have a polluter evaluate its own clean-up. A report on clean-up must be prepared and the adequacy determined by appropriate regulators and/or Kaska Governments	Spill Contingency Plan	4.1	An internal Spill Report Form for spills that are below the reportable spill threshold will be prepared for all spills, and the spill will also be recorded in the log book (added to Section 4.1 as per earlier comment). The log book is included in annual reporting to the regulator, and is available for review and assessment by inspector and public review via the agencies websites.
		4.2	No changes made to text. The plan already states that all reportable spills will have a report prepared and submitted to regulatory authorities and Kaska within 10 days of the spill. This report will include details on the clean up of the spill

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LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf Tailing Spills: The Spill Contingency Plan states that "if practicable, the area will then be reclaimed using material from the overburden and soil stockpiles and seeded." Remove the clause "if practicable." Tailings spills cannot be left unreclaimed.	Spill Contingency Plan	3.5.1.4	It appears that the intent of this section has not been interpreted as BMC expected and to clarify has been revised to: The area will be reclaimed. Where practicable material from the overburden and soil stockpiles will be used and seeded. If this is not practicable, other materials will be sourced to complete the reclamation.
LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf Concentrate Spills: BMC will retain private contractors to haul metal products to market. Since BMC will not have direct care and control of the haul vehicles, a question arises as to how BMC can enforce best practices. A secondary question arises as to who is liable for remediation costs. Please confirm that BMC will retain liability for spills during hauling and that BMC will bear costs for restoration of environmental damage caused by hauling a spill	Spill Contingency Plan	3.5.2	Text added: BMC will ensure that carriers are responsible for any spillage of concentrate from haulage activities. As part of this, it will be a condition of contract for haulage of concentrates that any carrier provides evidence of appropriate insurance cover to cover the cost of remediation of any spillage
LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf Internal Reporting: Kaska Governments require all internal spill reports to be made available for inspection	Spill Contingency Plan	4.1	An internal Spill Report Form for spills that are below the reportable spill threshold will be prepared for all spills, and the spill will also be recorded in the log book (added to Section 4.1 as per earlier comment). The log book is included in annual reporting to the regulator, and is available for review and assessment by inspectors. This report will be posted to Waterline and is therefore also available for public review. This log book will also be included in the annual report provided to Kaska.
LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf Spill Prevention: The Spill Contingency Plan notes that "no lubrication, refueling, or maintenance of equipment will be conducted within 30 m of the highwater mark." Please indicate how the high-water mark will be delineated to ensure that workers are aware of the maintenance exclusion area.	Spill Contingency Plan	6	Added clarification that the highwater mark will defined by the Project's hydrologist or fisheries biologist prior to construction activities taking place.
LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf The stated objective of the SCP is to promote preparedness and describe response procedures. A significant number of spills, however, go unnoticed, rather than unreported. No planned protective measures are in place to address this issue. Regular downstream water sampling and episodic sampling of stained ground or areas with anomalous odours must be completed to identify any spill that has gone (or continues to go) unnoticed.	Spill Contingency Plan	8.1	Updated Section 8.1to include: • Regular inspections of fuel dispensing facilities, Waste Management Facility and hazardous material storage areas, vehicles, equipment with fuel, fuel tanks/containers and documented in a logbook; • Episodic sampling of stained ground or areas with anomalous odours will be completed to identify any spill that has gone (or continues to go) unnoticed; and • Episodic sampling of surface water, should visual or olfactory evidence be observed.

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LFN Intervention (Exhibit 5.6.4): Memo- WQ Model, WTP Predictions, WQO's Report, EQS.pdf The Spill Contingency Plan notes the intention to conduct "periodic" perimeter inspections. These perimeter inspections must be scheduled to occur on a regular and recurring basis. These should involve a visual/olfactory inspection, routine water sampling at the perimeter, and episodic soil and vegetation sampling as dictated by observed changes	Spill Contingency Plan	8.2	The text has been updated to state that inspections will be completed on a weekly basis. The frequency of sampling will be undertaken as required by any observed changes.

LIST OF ACRONYMS AND ABBREVIATIONS

BMC	BMC Minerals Ltd.
CCME	Canadian Council of Ministers of the Environment
SDS	Safety Data Sheet
PPE	Personal Protective Equipment
WHMIS	Workplace Hazardous Material Information Systems
YG	Yukon Government

GLOSSARY

Emergency Spill: A release of a hazardous substance where there is potential for that substance to enter a waterway or cause significant danger or damage to life, health, or environment.

Line Supervisor: A person responsible for the safety and operational control of a team of people working in a given function, section or department.

Non-Emergency Spill: All spills that do not meet the criteria of an emergency spill or a spill of any diesel product, blasting agent, oil, lubricant, coolant or chemical that the responsible party is competent to manage safely and efficiently in terms of assessment, prevention, containment, and clean-up.

Reportable Spill: The release into the environment of a hazardous material above the reportable quantities or any release into a watercourse is a reportable spill under the Yukon *Spills Regulations* and requires immediately notify the 24-hour Yukon Spill Report line.

Spill: A release of a substance into the natural environment that is abnormal in quantity or quality in light of all circumstances of the release; or is in excess of an amount specified in the regulations (*Environment Act, Part 11*) (Yukon Government, 2016).

Special Waste: A dangerous good that is no longer used for their original purpose, including a dangerous good that is recycled, treated or disposed.

Special Waste Spill: Any release of special waste equal to or greater than (in a 24-hour period); 500 grams (g) of solid special waste; 500 millilitres (ml) of liquid special waste; 500 g or 500 ml, whichever is less, of mixed solid and liquid special waste; (in a 30-day period) 5 kilograms (kg) of solid special waste; 5 litres (L) of liquid special waste; 5 kg or 5 L, whichever is less, of mixed solid and liquid special waste.

Substance: A hazardous substance, pesticide, contaminant, or special waste.

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1 INTRODUCTION

1.1 PROJECT DESCRIPTION

BMC Minerals Ltd. (BMC) is the owner of the Kudz Ze Kayah Project (the Project). Since acquiring the project in 2015, BMC has actively engaged in assessing historical work, optimizing design, resource drilling, economic assessment, baseline environmental studies, and First Nations and community engagement as well as the successful completion of the Executive Committee Screening by the Yukon Environmental and Social-Economic Assessment Board.

1.2 PURPOSE

The purpose of the Spill Contingency Plan is to inform employees and contractors of the appropriate actions to take when responding to a spill during the Project's construction, operation, and closure. These actions will minimize the environmental effects and potential health and safety risks associated with accidental spills. The Spill Contingency Plan describes the substances that will be used at the Project site, reporting thresholds, an action plan for responding to spills, reporting sequences and forms, training requirements, spill prevention activities, and routine monitoring and maintenance activities.

BMC will ensure that all requirements related to spill response and reporting are implemented throughout the life of the Project. If the statutory and regulatory responsibilities change over the duration of the Project, the Company will update the Spill Contingency Plan. Hard copies of this plan will be kept in the camp office, process plant, reagent storage facility, fuel storage areas, explosives storage area, paste plant, waste management facility, maintenance shop, and other locations as required.

The objectives of the Spill Contingency Plan are to:

- Establish measures to prevent spills;
- Promote preparedness in the event of a spill;
- Outline the response and reporting process; and
- Describe current and planned protective measures.

1.3 PLAN REVIEW AND EXECUTION

BMC has had extensive engagement with Ross River Dena Council (RRDC) including community meetings in Ross River, Elders Oversight Committee Meetings, meetings with Chief and Council and engagement with RRDC's wholly owned environmental consultancy, Dena Cho Environmental and Remediation Inc. (Dena Cho). As part of this ongoing engagement, prior to this Plan being finalized Dean Cho conducted a detailed independent review of the draft plan. Issues raised during the Dena Cho review were addressed collaboratively through a number of workshops and where appropriate this plan was amended and additional commitments added.

BMC and Ross River Dena Council (in its role as lead community for the Kaska Nations, including Liard First Nation) are parties to an existing Socio-Economic Participation Agreement (SEPA) for the KZK Project. In 2019, BMC and RRDC signed a Letter of Intent committing the parties to a modernization process for the existing SEPA. In March 2021, BMC tabled a proposed modernized SEPA with all Kaska leadership. The proposed SEPA includes provision for establishment of a Kaska/BMC Environmental Management Advisory Committee (EMAC). Under the current proposal before Kaska, this committee will be tasked with, among other things, reviewing and providing input into environmental management plans, reporting on implementation of those plans, reviewing monitoring plans/results, and reviewing incident reports and reporting back to Kaska members.

2 SPILL CATEGORIES

2.1 INTERNAL REPORTING

All spills, whether reportable to external agencies or not, will be reported by all Project personnel and contractors to their Line Supervisor and to the site Environmental Department. Following the spill response, the designated person responsible for spill reporting will be required to document and review the spill using the Spill Report Form (Appendix A). A database of all spills will be maintained and reported to the Department of Energy, Mines and Resources and the Water Board as part of the annual reporting requirements. Recording requirements for the database is detailed in Section 4.1.

2.2 EXTERNAL REPORTING

Schedule A of the Yukon *Spills Regulations* (YG, 1996) defines reportable spill quantities in reference to hazardous material classes defined under the *Transportation of Dangerous Goods Regulations* (Government of Canada, 1992). The release into the environment of a hazardous material above the reportable quantities or any release into a watercourse is a reportable spill under the Yukon *Spills Regulations* (YG, 1996).

Reporting thresholds for all substances used or stored at the Project are provided in Table 2-1. A list of emergency contact numbers is provided in Appendix B.

Table 2-1: Reportable Spill Thresholds

Substance (Hazard Class)	Threshold Quantity
Explosives (1.1)	Any amount spilled outside of blast pattern
Flammable gases (2.1)	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error or deliberate action or inaction
Non-flammable gases (2.2)	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error or deliberate action or inaction
Poisonous Gases (2.3)	Any amount
Corrosive Gases (2.4)	Any amount
Flammable liquids (3)	> 200 L
Flammable solids (4.1)	> 25 kg
Spontaneously combustibles (4.2)	> 25 kg
Dangerous when wet (4.3)	> 25 kg
Oxidizers (5.1)	> 50 kg or 50 L
Organic peroxides (5.2)	> 1 kg or 1 L
Poisonous substances (6.1)	> 5 kg or 5 L
Organisms that are infectious (6.2)	Any amount
Corrosive materials (8)	> 5 kg or 5 L
Miscellaneous Dangerous Goods (9.1 and 9.2)	> 50 kg
Special waste (9.3)	> 500 ml

Source: Yukon *Spills Regulations* (YG, 1996)

2.3 STORAGE LOCATIONS OF HAZARDOUS MATERIALS

The storage location and type of hazardous materials used on site are described in the Hazardous Materials Management Plan (BMC, 2026a). All substances and hazardous materials brought on site will be required to be accompanied by a Safety Data Sheet (SDS) which will be stored together in centralized locations across the Project site.

BMC will ensure that spills kits contain equipment that are compatible with the types and volumes of material stored. Specific spill kits will be stored at specific locations as detailed in Section 3.4.

3 SPILL ACTION PLAN

3.1 ROLES AND RESPONSIBILITIES

All personnel and contractors are responsible for identifying, containing (if safe to do so), remediating, and reporting spills on the Project site. However, to ensure the safety of all workers, minimize the negative effects of spills on the environment, and ensure proper reporting all employees and contractors will have specific responsibilities when responding to a spill (Table 3-1).

Table 3-1: Roles and Responsibilities

Position	Responsibilities
All Personnel and Contractors	• Identify and report all spills; • Ensure the safety of all near by workers; • Begin first aid if required or call for medical emergency over radios; • Identify the substance spilled, the volume, and contain it (if safe to do so); • Remove all ignition sources; • Report the spill to Line Supervisor and Environmental Department immediately; and • Assist in the clean-up.
Line Supervisor	• Assume control of the area after notification; • Ensure the safety of all workers in the area; • Ensure all clean-up workers are equipped with the proper Personal Protective Equipment (PPE) for the spilled material; • Direct containment and clean-up efforts, if not an emergency spill; • Report the spill to the site Environmental Department; • Collect information on the spill including the location, substance, and volume; • Aid crews in remediating the site; • Ensure all contaminated materials are removed and taken to the Waste Management Facility for proper disposal; and • Implement remediation and restoration of the impacted area, with guidance from the Environmental Department.
Emergency Response Team (ERT)	• Respond to emergency spills; • Assume control of the spill site and restrict all non-essential personnel from entering; • Stop the source of the spill, if safe to do so; • Contain the spill using sorbent booms, pads, soil, snow, or any other materials available; and • Remediate the site as directed by the Site Senior Executive and site Environmental Department.
Medic	• Ensure Line Supervisor has been notified of incident; • Provide first aid treatment if necessary; • Mobilize ambulance to scene, if required; and • Stand by to assist as required by scene coordinator.
Safety & Training Department	• Arrange/Coordinate first aid/transportation of injured (if required); • Ensure legislation compliance; • Assist with site investigation/interviews; • Determining Root Cause Analysis; • Implement Remedial Action Plan; and • Training overall site safety responsibilities.
Environmental Department	• Support and assist the relevant Line Supervisor so as to ensure that all spills are responded to and documented correctly; • Determine if the spill is reportable; • Assist crews with spill containment and clean-up (if safe to do so); • Provide guidance for remediation; • Monitor sites that have been remediated to assess success of remediation efforts; • Ensure all contaminated materials are properly dealt with according to the Safety Data Sheets (every material is managed differently according to their designation within these MDS's);

Position	Responsibilities
	• Notify the Yukon 24-hour Spill Hotline of *"reportable"* spills; • Notify Mine and BMC management of the spill; • Participate in the incident investigation; • Review all Spill Report Forms for accuracy and completeness; • Maintain a record of all spills; • Provide all personnel and contractors with spill response training; and • Participate in the annual management review to address the need for changes to the Spill Contingency Plan regarding, performance records, site specific conditions, changing circumstances, monitoring results, and BMC's commitment to continuous improvement.
Site Senior Executive	• Provide the necessary resources to ensure the implementation of the Spill Contingency Plan; • Delegate authority necessary to effectively implement each element of the Spill Contingency Plan; • Direct the incident investigation; • Support actions required to correct any non-conformances; and • Participate in the annual management review to address the need for changes to the Spill Contingency Plan regarding, performance records, site specific conditions, changing circumstances, monitoring results, and BMC's commitment to continuous improvement.
BMC Senior Management Team	• Manage media relations as required on Spill Contingency Plan performance and any reportable spills; • Provide the necessary resources to ensure the implementation of the Spill Contingency Plan; • Delegate authority to specific personnel to carry out each element of the Spill Contingency Plan; and • Support actions required to correct any non-conformances.

3.2 SPILL CLASSIFICATION

In addition to the internal and external reporting requirements, spills will further be defined as either an "*Emergency Spill*" or a "*Non-emergency Spill*" (as defined below), as the required action plans and reporting requirements will differ according to the type of spill.

3.2.1 Non-emergency Spill

A Non-emergency Spill is a spill of any substance that personnel and/or contractors near the incident can competently, safely, and efficiently manage in terms of assessment, containment, and clean-up. Most spills that could occur on the Project are likely to be small releases of fuel, oils, lubricants, and coolants. If a person is unsure as to whether the spill site is safe or is unsure of the substance spilled, they should immediately notify their Line Supervisor.

Figure 3-1 outlines the general response for both non-emergency and emergency spills.

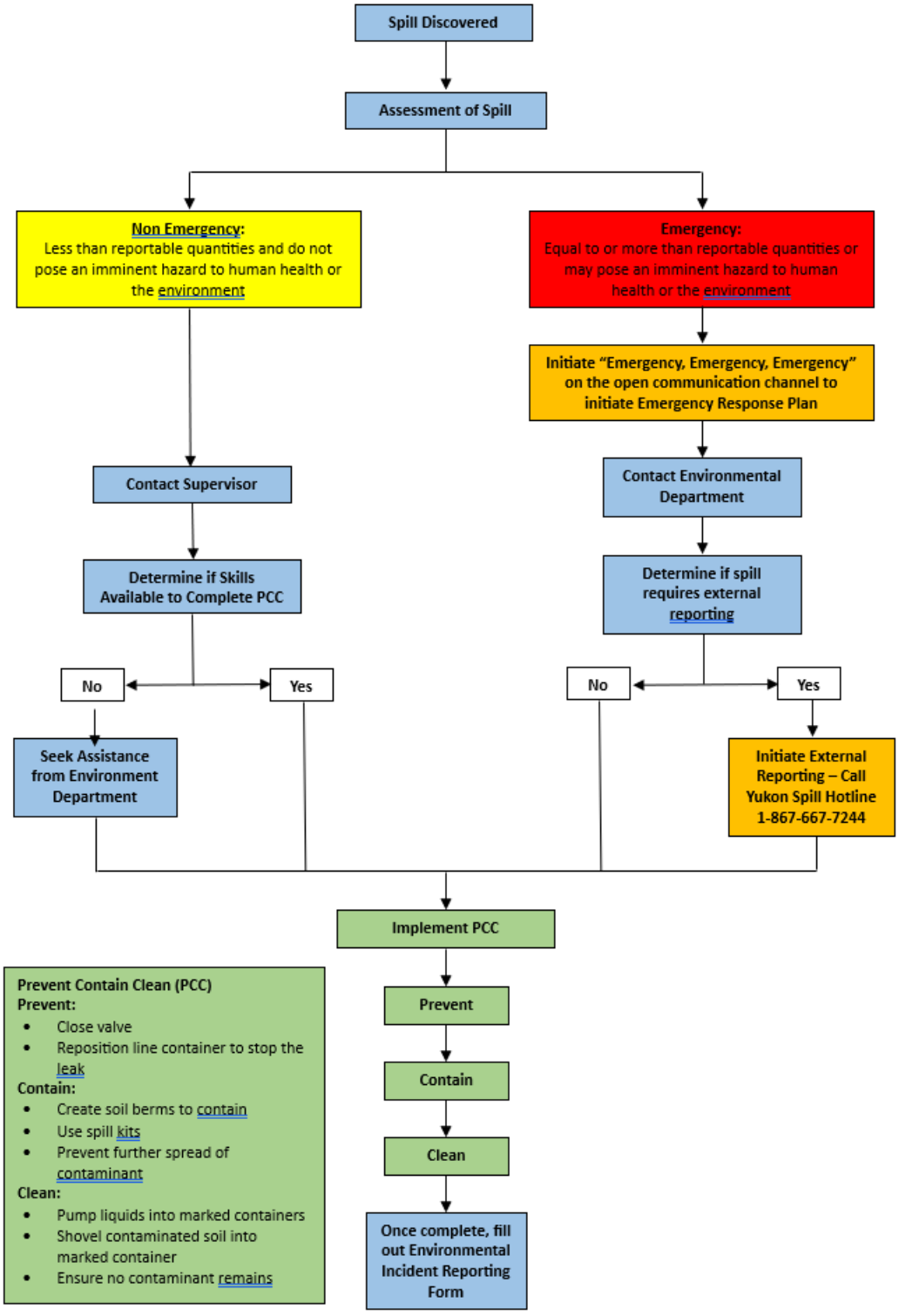


Figure 3-1: Example of General Response for Both Emergency and Non-emergency Spills

3.2.2 Emergency Spill

An Emergency Spill is a release of a hazardous substance where there is potential for that substance to enter a waterway or cause significant danger or damage to life, health, or environment. When a spill is identified, the discoverer should initially follow the general spill response procedures outlined in Section 3.3. If the discoverer assesses the scene to be unsafe, or does not have the appropriate training, or has insufficient resources on hand, or the spill has entered a watercourse they will initiate "Emergency, Emergency, Emergency" call on the mine site open communication channel with the location and brief description of the emergency to initiate the Emergency Response and Health and Safety Plan (BMC, 2026b). Once the Emergency Response Plan is initiated the Emergency Response Team will assume control of the spill site and clean-up activities. The Emergency Contact List is provided in Appendix B.

Figure 3-2 provides a flowchart for a typical command structure during an emergency spill response.

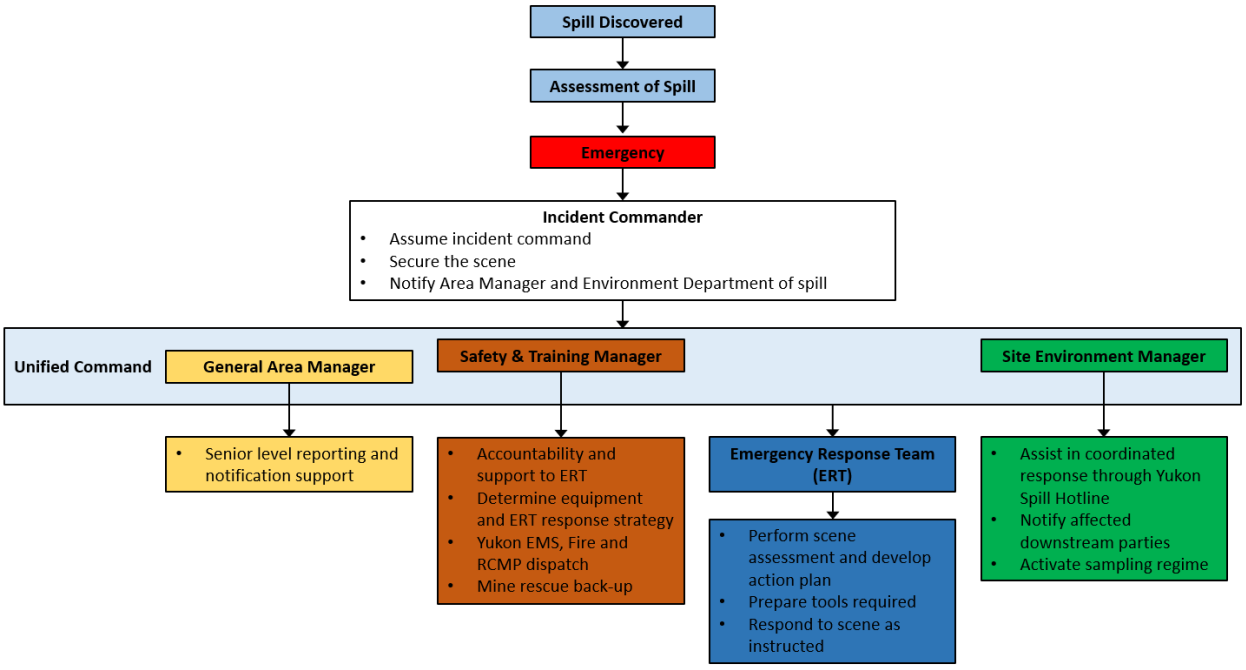


Figure 3-2: Example of the Emergency Response Command Structure

3.3 SPILL RESPONSE PROCEDURES

The priority following any spill is the safety of all personnel in the immediate vicinity, and to minimize potential effects on the environment. Spill containment and site remediation may begin after the spill site has been deemed safe, the spilled substance has been identified, and workers have the appropriate Personal Protective Equipment (PPE).

Before responding to any spill, make sure you STOP and THINK:

- Identify hazards;
- Locate injured workers;
- Assess risk to life and limb; and
- Control risks, only if safe to do so.

If the above four conditions are met, crews will follow this sequence of events following a spill:

1. **Safety:**
   - Ensure safety of all personnel;
   - DO NOT rush in until the area is deemed safe and the spilled substance has been identified;

- Identify the substance spilled, if it cannot be identified assume that it is dangerous;
- Control the scene, notify all workers around the spill, and limit access to essential personnel only;
- Remove all sources of ignition, if safe to do so;
- If it is unsafe to enter the area or the spill has migrated into a watercourse, immediately implement the Emergency Response and Health and Safety Plan (BMC, 2026b); and
- Use appropriate PPE as outlined in the SDS, included in the Hazardous Materials Management Plan (BMC, 2026a).

2. First Aid:

- Call first aid attendant if necessary;
- Confirm with the First Aid attendant the nature of the spill, and jointly determine if it is safe to enter a spill area;
- Attend to the injured worker if safe to do so; and
- Administer first aid.

3. Stop the Flow:

- Act quickly to reduce the risk of environmental impacts;
- Shut off pumps, plug holes, or close valves (if safe to do so); and
- Stop the flow or the spill at its source.

4. Secure the Area:

- Limit access to the spill area;
- Contact your Line Supervisor and/or spill response team;
- Provide basic information (who, what, where, when and how); and
- Prevent unauthorized entry onto the spill site.

5. Contain the Spill:

- Prevent spilled material from entering drainage structures (ditches, culverts, drains, dams);
- Use spill sorbent material to contain the spill;
- If necessary, use a dyke or any other method to prevent any further discharge on site;
- Make every effort to minimize contamination; and
- If the spill is on water, use oil sorbent booms to prevent the spill from spreading.

6. Notification:

- Report the spill to your Line Supervisor and the site Environmental Department; and
- If spill triggers external reporting requirements per Table 2-1, the site Environment Department will call the Yukon Spill Hotline 1-867-667-7244.

7. Clean-up the Spill:

- Determine clean up options;
- Mobilize recovery equipment and clean-up crews;
- Some materials require special equipment and PPE to properly clean up and dispose of, refer to Safety Data Sheets to determine how best to clean-up and dispose of specific spills;
- Transport all appropriate contaminated materials to the Waste Management Facility for proper treatment and/or disposal;
- Dispose of all equipment and/or material used in clean up (e.g. used sorbent, oil containment material) in accordance with Waste Management Plan (BMC, 2026d);
- Accidental spills may produce hazardous wastes (e.g., material with > 3% oil by mass) and contaminated soil. All waste disposal must be in accordance with the Waste Management Plan (BMC, 2026d); and
- Replenish spill response kits and equipment.

8. Notify the Appropriate Authorities:

- Internal spills are reported to the site Environmental Department; and
- The site Environmental Department will notify external authorities.

9. Spill Report Form:

- The discoverer and the department responsible for management of the area in which the spill occurred will provide the following information on the Spill Report Form (Appendix A):
  - Name of first observer;
  - Line Supervisor;
  - Location of spill;
  - Site conditions (temp, wind, precipitation, etc.);
  - Time;
  - Type of substance spilled and if unknown, any information on physical state, colour, viscosity, odour etc.;
  - Volume;
  - Cause of spill (equipment malfunction, vehicle accident, etc.);

- Spill environment (concrete pad, gravel surface etc.);
- Nearest watercourse;
- Potential to enter a watercourse;
- Safety hazards identified (i.e,. Fire, explosive, etc.);
- Any injuries or hazards to life and limb;
- Effect on the environment, if any;
- Photos;
- Description of what caused the spill;
- Containment actions and equipment and clean-up consumables used to clean the spill;
- Samples collected;
- Line Supervisor reported to;
- Is the spill reportable?;
- Who was the spill reported to; and
- Other relevant information as required.

10. Incident Investigation:

- Investigate the cause of the spill and identify actions to prevent a similar incident from occurring in the future; and
- Actions to prevent reoccurrence.

3.4 SPILL RESPONSE EQUIPMENT

Spill kits will be available at all facilities and hazardous storage areas. All vehicles including light duty, heavy equipment, hazardous material transporters, and semi-trucks will be equipped with a spill kit. The contents of each spill kit will depend on the type of hazardous material being transported, stored, the volume, and location. In general, spill kits will contain sorbent pads, booms, hazmat sorbent material, appropriate PPE, and disposal equipment. For a hydrocarbon spill in any of the Operations Water Management Ponds, oil skimmers will be available to assist clean-up.

Specialized equipment such as reagent specific spill equipment will be stored in or next to spill kits in the facilities where they are required.

Figure 3-3 shows the proposed locations of spill kits and Table 3-2 provides the general contents of spill response equipment that will be stocked in each type of spill kit. Replacement consumable spill response equipment (e.g., sorbent pads and booms) and spare spill kits will be stored at the Waste Management Facility. Departmental Managers, supported by the site Environmental Department, will be responsible for ensuring that spill kits are inspected monthly and spent supplies are replenished.

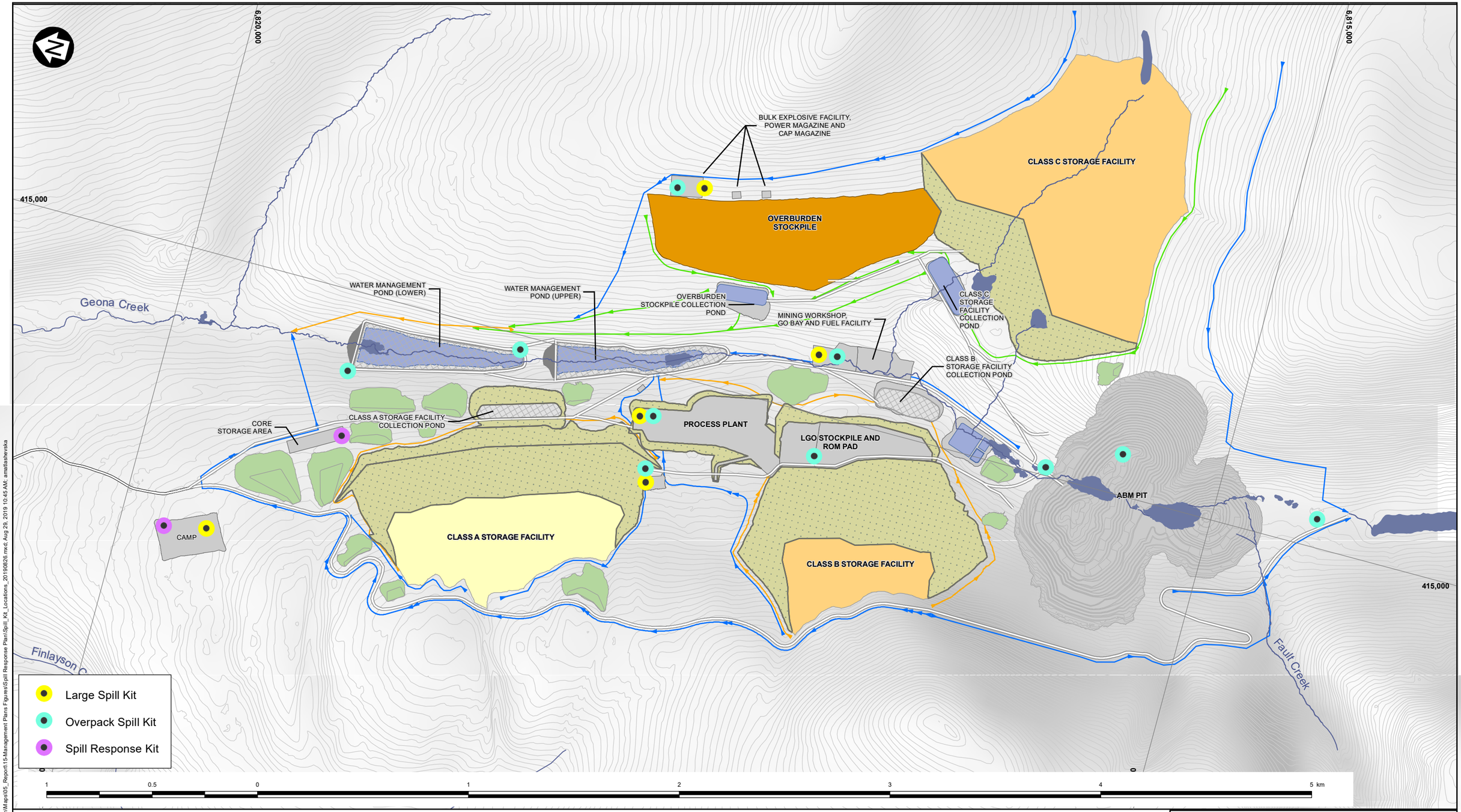
Table 3-2: Type of Spills Kits and Their Contents

Content	Large Spill Kit (546 L)	Overpack Spill Kit (231 L)	Spill Response Kit (231 L)	Truck Spill Kit (37 L)
Sorbent Pads (oil)	300	100	100	24
Sorbent Pads (Universal)	300	100	100	24
Sorbent Pillows Small (oil)	8	6	6	2
Sorbent Pillows Large (oil)	12	12	-	-
Booms 3”x4’ (oil)	8	4	2	2
Booms 3”x8’ (oil)	8	4	5	-
Hazmat sorbent material (25 lb Bag)	1	1	1	-
Plug Patties (instant leak stop)	2	1	1	1
Plug and Dike	1	-	-	-
Neoprene Drain Covers	2	1	1	-
Telescopic Shovel	1	-	-	-
Barrier Tape (roll)	1	1	1	-
Poly-coated Tyvec Suits	2	2	1	-
Splash Goggles	2	1	1	-
Nitrile Gloves	2	1	1	1
Disposable Respirators	2	2	2	-
Disposal Bags	10	5	2	1
Spill Kit Labels	4	2	3	-

Note:
1. (### L) – denotes spill capacity of kit.

Additional spill equipment will be available on site for larger spills and includes:

- Heavy equipment (e.g., dozer, loader, excavator, bobcat, grader, and dump truck):
- Shovels, rakes, axes;
- Pails and drums;
- Pumps and hoses; and
- Emergency flagging and triangular reflectors.



Class A Storage Facility
Class B and C Storage Facility
Overburden Stockpile
Topsoil Stockpile

Progressive Reclamation
Liner
Pond/Water
Existing Waterbodies

Existing Watercourse
Non Contact Diversion Ditch
Contact Class A & B Diversion Ditch
Contact Class C Diversion Ditch

Tote Road/Proposed Access Road
Proposed Road

DISCLAIMER:

THIS DRAWING REPRESENTS THE ITEM(S)/STRUCTURE(S) AS PER THE FEASIBILITY LEVEL DESIGN. ALL RATES, CAPACITIES, DIMENSIONS, WEIGHTS, TIMEFRAMES AND VOLUMES ARE SUBJECT TO DESIGN CHANGE ONCE THE FINAL LICENSE OR PERMIT CONDITIONS ARE KNOWN OR IN ACCORDANCE WITH SITE CONDITIONS ENCOUNTERED.

NOTES:

1. BASE MAP: Yukon Government DEM and Hillshade (30 m Resolution).

2. COORDINATE GRID IS IN METRES.
COORDINATE SYSTEM: NAD 1983 UTM ZONE 9N.

3. THIS FIGURE IS PRODUCED AT A NOMINAL SCALE OF 1:17,000 FOR 8.5x11 (LETTER) PAPER. ACTUAL SCALE MAY DIFFER ACCORDING TO CHANGES IN PRINTER SETTINGS OR PRINTED PAPER SIZE.

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KUDZ ZE KAYAH PROJECT

LOCATION OF SPILL RESPONSE EQUIPMENT

ALEXCO ENVIRONMENTAL GROUP

P/A NO. VA101-640/11

REF NO. -

FIGURE 3-3

REV -

SAVED: D:\Project\All\Projects\Kudz_Ze_Kayah\Maps\05_Report\15-Management Plans Figures\Spill Response Plan\Spill_Kit_Locations_20190826.mxd Aug 29, 2019 10:45 AM; amattashetvska

3.5 CLEAN-UP PROCEDURES

Clean-up procedures will vary depending on the substance, size of the spill, location (i.e. indoors or outdoors), proximity to environmentally sensitive areas (i.e., watercourses), weather conditions, and the resources available. Personnel should always refer to the relevant SDS for the spilled substance to ensure they have the proper PPE and are using appropriate equipment (i.e., absorbent pads) to safely and properly remediate the spill.

All spills and contaminated materials will be managed in compliance with the Yukon *Spills Regulations* (YG, 1996), Yukon *Contaminated Site Regulations* (YG, 2002) and Contaminated Sites Regulation Protocols (see www.yukon.ca/en/waste-and-recycling/contaminated-sites/managing-contaminated-site).

Any remediation work that may be required following a spill will be carried out by a qualified professional and done in accordance with the Yukon CSR and the Soil Remediation and Confirmatory Soil Sampling Following a Spill Procedure in Appendix C. Any reporting and/or analytical results that are produced as part of remediation efforts will be made available to YG upon request.

3.5.1 Site Operational Spills

The following are general procedures for containing and disposing of materials contaminated by a known substance which is deemed safe to contain, control and handle following consultation with the SDS. Various practical methods of containment and recovery have been proven and effective for use in northern climates on land, snow ice or in open water (i.e. water management ponds). The following sections provides a summary of these methods.

3.5.1.1 Spills to Land

- Eliminate all sources of ignition;
- Stop the source of the spill (if safe to do so);
- Excavate trenches, build dikes, and/or use sorbent booms to contain the spill. Special attention should always be given to prevent the spill from entering a watercourse;
- Pump liquid into a marked container for disposal;
- Use sorbent pads to remove liquids that cannot be pumped;
- Complete site assessment sampling in accordance with Contaminated Sites Regulation Protocol 3 (Soil sampling procedures at contaminated sites) to assess the extent of soil contamination.
- Excavate contaminated soils and place in marked disposal bags or bins for transport to the Land Treatment Facility for remediation. The depth of excavation will depend on the volume of the spill and the porosity of the soils.
- Complete confirmatory sampling in accordance with Contaminated Sites Regulation Protocol 3 following excavation of contaminated soil to verify that all contaminated soil has been

removed. The site Environmental Department will coordinate testing of samples in accordance with Contaminated Sites Regulation Protocol 5 (Petroleum hydrocarbon analytical methods and standards) to verify that all contaminated material has been adequately removed;

- Transport the contaminated soils and sorbent materials to the Waste Management Facility for proper disposal per the Waste Management Plan (BMC, 2026d); and
- If a spill to land ultimately enters open water, refer to Section 3.5.1.3.

3.5.1.2 Spill to Snow or Ice

- Eliminate all sources of ignition;
- Stop the source of the spill (if safe to do so);
- Contain the spill by excavating intercept ditches or constructing snow berms. Special attention should always be given to prevent the spill from entering a watercourse;
- Pump liquid into a marked container for disposal;
- Use sorbent pads to clean-up the spilled substance;
- Excavate all contaminated snow or ice and place in a watertight disposal bag or bin;
- Transport the contaminated snow or ice to the Waste Management Facility for proper disposal per the Waste Management Plan (BMC, 2026d), monitoring that any meltwater from the contaminated snow or ice does not escape from the transportation vessel;
- If warranted, confirmatory soil samples will be collected if/when ground thaws. Sampling would be conducted as per Yukon CSR Protocol 3; and
- If a spill to snow or ice ultimately enters open water, refer to Section 3.5.1.3.

3.5.1.3 Open Water

- Eliminate all sources of ignition;
- Stop the source of the spill (if safe to do so);
- If the spill occurs to one of the Operations Water Management Ponds deploy the oil skimmer;
- If the spill occurs to flowing water, quickly deploy sorbent boom downstream of the spill to prevent it from spreading. If possible, booms should be installed at multiple locations downstream to capture any spilled material that escapes the primary containment;
- Collect all sorbent booms and pads and place them in a marked disposal bag or bin;
- Transport the contaminated materials to the Waste Management Facility for proper disposal per the Waste Management Plan (BMC, 2026d);
- All spills to Geona Creek, Finlayson Creek, South Creek, or any of their tributaries must be reported to the Yukon Spill Report Line **1-(867)-667-7244;** and

- For site Environmental Department will determine when all contaminated material has been adequately removed.

3.5.1.4 Tailings Spills

In the event of a truck accident involving a vehicle carrying tailings to the Class A Storage Facility, an investigation will take place immediately to document and delineate tailings that were spilled and the following procedure will be conducted:

- Any spilled tailings and impacted soils will be excavated back into a truck for transport to the Class A Storage Facility;
- Soil/vegetation will be tested to ensure that all tailings were collected; and
- The area will be reclaimed. Where practicable material from the overburden and soil stockpiles will be used and seeded. If this is not practicable, other clean materials will be sourced to complete the reclamation.

The equipment used to contain any site operational spill will depend on the size of the spill, the location, and the time of year the spill occurs. Small spills on land may be contained by hand excavating trenches with shovels and/or with sorbent pads alone. However, large spills or spills that occur on frozen ground may require an excavator or dozer to construct trenches and excavate contaminated materials.

Spills to open water have the potential to spread quickly, therefore, rapid deployment of the sorbent booms should be the priority after ensuring the safety of all works in the area. Once booms have been deployed the oil skimmer or pumps can be used to effectively remove hydrocarbons. Ethylene glycol is soluble in water, if glycols are spilled to a watercourse, it is important to isolate and/or confine the spill to prevent downstream migration prior to pumping to drums for transport and disposal.

The site Environmental Department will respond to all spills, advise crews on the proper clean-up methods, and will be responsible for determining when the spill site has been fully remediated.

3.5.2 Concentrate Spills

Concentrates (metal products produced by the mine) will be hauled from the Project site along the Access Road to the Robert Campbell Highway, and on to market locations. Haulage contractors will be required to provide an Emergency Response Assistance Plan that will outline response procedures to be followed in the event of an emergency during the transportation of concentrate. The Plan will include suitable response procedures and current contact information for the contractor's office, the Project site, regulatory agencies (BC and Yukon), medical facilities, emergency services (BC and Yukon) and key contacts within potentially-affected communities. The trucks will carry suitable health and safety equipment and spill response supplies to be used in the event of an accident or spillage of concentrates. Safety is a paramount concern and the driver will be required to have training in responding to spills while wearing appropriate PPE. A copy of the Emergency Response Assistance Plan will be provided to the Emergency Response Team, should they need to respond to an incident involving a truck carrying concentrate.

BMC will ensure that carriers are responsible for any spillage of concentrate from haulage activities. As part of this, it will be a condition of contract for haulage of concentrates that any carrier provides evidence of appropriate insurance cover to cover the cost of remediation of any spillage.

Spill of concentrate on the Access Road:

- Ensure the safety of all personnel and call the first aid attendant, if necessary;
- Use spill equipment to contain and clean-up any hydrocarbon or concentrate spill;
- Heavy equipment will be used to collect all spilled concentrate;
- Report the spill to the site Environmental Department and Site Senior Executive;
- If concentrate enters Geona Creek, Finlayson Creek, or any of their tributaries the Yukon Spill Report Line **1-(867)-667-7244** must be notified by the site Environmental Department;
- Fill out the Spill Report Form; and
- Conduct incident investigation.

Spill of Concentrate on a Public Highway:

- Ensure the safety of all personnel and call 911, if necessary and possible;
- Use spill equipment to clean-up any hydrocarbon and/or concentrate spill as described above;
- Notify site Environmental Department and Site Senior Executive, who will coordinate with Yukon Highways and Public Works and/or BC Ministry of Transportation for clean-up and emergency response;
- Site Senior Executive will mobilize equipment or hire a third-party contractor to remediate all spilled concentrate;
- If concentrate, hydrocarbons, or glycol spills enter an off site watercourse the Yukon Spill Report Line **1-(867)-667-7244** (Yukon) (or the Provincial Emergency Program **1-800-663-3456** (British Columbia)) must be notified by the site Environmental Department;
- Fill out the Spill Report Form; and
- Conduct incident investigation.

4 INTERNAL AND EXTERNAL REPORTING

4.1 INTERNAL REPORTING

As outlined in Section 2.1, all spills, whether required to be reported to external agencies or not, will be reported to the site Environmental Department. Following the spill response, the person designated responsible for spill reporting will be required to document and review the spill using the Spill Report Form. All spills, regardless of volume, will be tracked internally as a mechanism for continual improvement.

BMC will maintain a log book of all spill occurrences, including spills that are less than the reportable quantities under the Yukon *Spills Regulations* (YG, 1996). The log book will include, but not necessarily be limited to:

- the date and time of the spill occurrence;
- the substance spilt or discharged;
- the approximate amount spilt or discharged;
- the location of the spill;
- the distance between the spill or discharge and the nearest Watercourse; and
- remedial measures taken to contain and clean-up the spill area or to cease the unauthorized discharge.

The log book record of spill occurrences will be included in annual reporting per the licence requirements, and will also be available for review and assessment by inspectors.

4.2 EXTERNAL REPORTING

The site Environmental Department will notify the 24-hour Yukon Spill Report Line (**1-(867)-667-7244**) should a spill exceed the reportable thresholds set by the Yukon *Spills Regulations* (YG, 1996) (Table 2-1). Although several government agencies at the federal, territorial, and municipal levels may ultimately be informed, only the Yukon 24-Hour Spill Report Line is required for statutory reporting purposes. In addition to this, in the event of a major release of a hazardous substance, a separate report will be made to the Workers' Safety and Compensation Board, in accordance with the Yukon *Workers' Safety and* Compensation Act (YG, 2021).

In addition to spills exceeding the quantities listed in Table 2-1, a spill of any quantity that enters Geona Creek, Finlayson Creek, and South Creek or any of their tributaries is a reportable spill and must be reported to the Yukon 24-Hour Spill Report Line. Following the spill response, the designated person responsible for spill reporting will be required to document and review the spill using the Spill Report Form (Appendix A).

The Environmental Department will ensure that all appropriate information is collected before reporting to the Yukon 24-Hour Spill Report Line including:

- Location of the spill or leak;
- Time of spill or leak;
- Severity of spill or leak;
- Type of spill;
- Substance spilled;
- Volume of spill;
- Nearest watercourse;
- Potential to enter surface water;
- Fire hazard;
- Hazard to life and limb, or any injuries;
- Expected environmental effect, if any;
- Equipment and clean-up consumables used; and
- Status of spill containment and clean-up.

The site Environmental Department will provide support as necessary to the Line Supervisor, The Environment Yukon Spill Report file number, and the first/last name of the person to whom the spill was reported in the Spill Report form.

BMC will also contact Kaska, Department of Energy, Mines and Resources and the Water Board via email or phone after discovery of a reportable spill. A detailed written report will be submitted to the regulatory authorities within 10 days following the event.

Figure 4-1 outlines the reportable spill reporting lines of communication.

A list of emergency contact numbers is included in Appendix B.

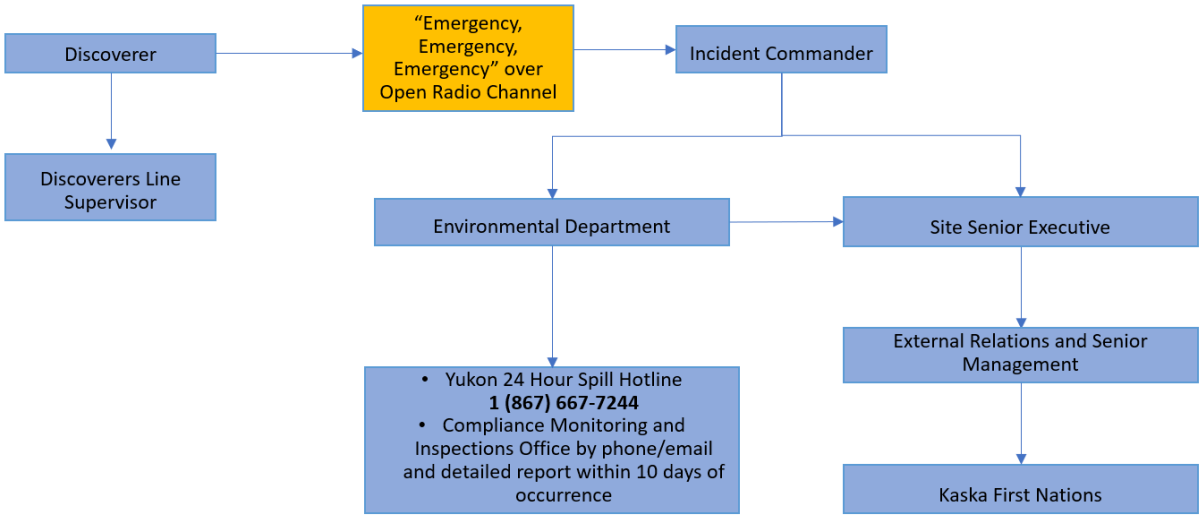

Figure 4-1: Spill Reporting Lines of Communication

In addition to external spill reporting requirements dictated under legislation, Kaska and BMC are currently bound by the terms of a Socio-economic Participation Agreement (SEPA) signed in 2004 between Teck and Ross River Dena Council on behalf of all Kaska and endorsed by all Kaska First Nations. The SEPA requires establishment of a Management Advisory Committee (MAC) before the mine is in operation, with Kaska and BMC representation to oversee implementation of the SEPA. The SEPA further requires Kaska representation in an ad hoc environmental committee to review and report on issues as they arise and to report back to the MAC.

As part of a SEPA Modernization process agreed to by BMC and Kaska, BMC has proposed formalizing this ad hoc group as a stand alone Environmental Management Advisory Committee (EMAC) in the modernized SEPA. Under the current proposal before Kaska, this committee will be tasked with, among other things, reviewing and providing input into environmental management plans, reporting on implementation of those plans, reviewing monitoring plans/results, and reviewing incident reports (including reports on externally reportable spills and annual reporting per licence requirements that incorporates log book records of all spill occurrences) and reporting back to Kaska members.

The commitments in the current and the proposed modernized SEPA also fulfill (in part) the requirements of Condition 12 and 13 of the Decision Document.

5 TRAINING REQUIREMENTS

During site orientation all personnel and site visitors will receive basic training on proper handling, use, storage, transportation of hazardous substances, spill identification, clean-up, and reporting procedures. Task specific training will address spill response to specific substances that personnel will encounter during their normal duties and their requirements for safe material handling, storage, and clean-up.

All personnel are required to have the following training:

- General site orientation;
- Project specific spill orientation including (but not limited to):
  - Roles and responsibilities;
  - Site procedures;
  - Location of spill kits;
  - Type of substances stored and used on site;
  - Hazards, health and safety risks;
  - Containment options;
  - Emergency contacts;
  - Communication protocols; and
  - Reporting.
- Workplace Hazardous Material Information Systems (WHMIS) – Renewed every 3 years; and
- Transportation of Dangerous Goods (for personnel involved in handling, use or are responsible for chemicals or hazardous materials).

Any personnel involved in fuel handling will be trained in the safe fuel handling, spill prevention, response, and reporting procedures. All fuel handlers, including delivery contractors, will be required to provide evidence of Transportation of Dangerous Goods training and will be responsible for maintaining records and ensure any incidents are reported appropriately to authorities.

All employees (and contractors) involved with handling hazardous materials will receive training on safe and appropriate use. This will include the Emergency Response Team.

Emergency drills are an integral part of the Project's preparation for and testing of emergency response capabilities, as detailed in the Emergency Response and Health and Safety Plan (BMC, 2026b). An emergency drill on a mock spill will be held annually during the Construction, Operations and Active Closure phases of the Project to test the completeness of the Plan and the readiness of staff to respond to a major spill. Following completion of the emergency drill, debriefing of participants will be undertaken to identify areas for improvement of the Plan and opportunities for

additional training of personnel. All training records will be tracked and maintained to ensure updated training certification for on site personnel and contractors.

6 SPILL PREVENTION

BMC's goal is to prevent a spill from occurring by training personnel on proper handling, storage, containment, and transfer of oils, lubricants, and other hazardous materials. Preventative maintenance and routine inspections will also play an important role in identifying and mitigating spills.

Spills during fuelling and lubrication operations are typically the most frequent and preventable spills on any project. Wherever possible, fuelling and lubrication works will be completed within designated fuelling and maintenance areas. No lubrication, refuelling, or maintenance of equipment will be conducted within 30 m of the highwater mark, where practical. The highwater mark for each of the Project's waterbodies will be defined by the Project's hydrologist or fisheries biologist prior to construction activities taking place. It is possible that situations may arise where limited fuelling and maintenance will be required within these areas (for example in the event of equipment breakdown), and to reduce the likelihood of spills during these times, operators will place spill containment (e.g., containers or spill trays) or absorbent matting (where appropriate) under the fuelling area to capture drips and spills from overfilling. Only authorized personnel having completed appropriate training will be allowed to operate fuelling equipment. Additionally, all fuelling equipment is to be inspected before every use to ensure the hoses are free of leaks and the automatic shutoff valves are functioning as intended.

6.1 CONTAINMENT STRUCTURES

Hazardous materials and liquid reagents will be stored in containment areas designed to hold 110% of the volume of the largest tank. Storage of bulk fuel will be in double walled tanks of steel construction, or other appropriate storage devices. All portable gasoline-powered equipment (including double lined tanks), jerry cans, and generators will be placed in spill containment trays with 110% of the volume of the largest tank. Truck mounted tidy tanks will be double walled, and the operator will ensure the hoses are free of leaks and the automatic shutoff valves are functioning as intended before every use.

6.2 SITE AND ACCESS ROAD SPILL PREVENTION

The Emergency Response Team will respond to emergencies on site and the Access Road. The Emergency Response Team will be staffed with site-based, qualified employees who are trained and receive the resources to respond to a range of emergences including natural hazards, accidents, fires, and spills of hazardous materials.

To prevent spills along the Access Road and site roads, the following mitigation measures will be implemented:

- Speed limits will be strictly enforced for all personnel and transport vehicles;
- The transportation of all hazardous materials will adhere to *Transportation of Dangerous Goods Act* and *Regulations*;

- All contractors will be required to complete Project specific induction it the Access Road gatehouse outlining Company policies surrounding speed limits, wildlife interactions, radio protocol, responsibilities for spill response, and required vehicle maintenance standards;
- BMC has a gate house at the junction of the Access Road and the Robert Campbell Highway to restrict public access to the Project site;
- All wildlife crossings and migration routes will be properly signed and clearly identified;
- BMC will ensure appropriate signage is installed along the Access Road; and
- Escape routes will be ploughed in the Access Road to allow wildlife to exit the Access Road during the winter months.

7 FUEL TRANSFER

All personnel who handle, transport and/or store fuel and lubricants will be trained in safe work practices and procedures.

Spill prevention measures will be adopted to ensure safe and secure transfer of hazardous materials from product transporters and in the Project site, including (but not limited to):

- All on site fuel storage containers will have secondary containment with capacity of 110% of the volume of the storage;
- Fuel transfers will be completed in accordance with operating procedures to minimize the potential for fuel spills during dispensing;
- Major fuel refuelling areas will be
  - Constructed over concrete containment sumps or other appropriate containment system(s);
  - Equipped with emergency shutoff valves and/or controls,
  - Have emergency spill procedures posted nearby; and
  - Flashing and/or strobe lights above the refuelling station to indicate activation of the refuelling station.
- All refuelling hoses will be outfitted with deadman switches and breakaway valves;
- Storage drums will be kept in an upright position;
- Storage drums will be placed under cover and/or titled to prevent water from entering the drums; and
- Spill kits and equipment will be located at all pumps and fuel storage areas.

8 ROUTINE MAINTENANCE AND MONITORING

All equipment, light-duty pick-up trucks, and fuel truck operators are required to conduct daily pre-work inspections of their equipment to ensure that it is in good working order and free of leaks and worn parts. If the equipment is not deemed safe to operate, then the site Maintenance Department will be notified, and the machine will not be operated until the identified issue is resolved. All equipment will undergo scheduled preventative maintenance inspection by a mechanic and all worn or damaged parts will be replaced to ensure the equipment is in good working condition.

A strict tag-out policy will be adopted to prevent use of equipment deemed unsafe or in poor working order.

The fuel farm(s) will be built in designated area(s) in double walled tanks of steel construction or other appropriate containment system(s). Fuel tanks will be equipped with level sensors to prevent accidental overfilling. All fuel and hazardous materials storage areas will be inspected monthly for signs of damage or leaks, records of all inspections will be maintained by the site Environmental Department. Records of fuel deliveries will be compared to the computer tracking of withdrawals to identify incidental loss or leaks. A suitably qualified engineer will inspect the fuel farm(s) as required and any deficiencies will be documented and corrected to ensure the storage tanks adhere to the *CCME Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum* (Canadian Council of Ministers of the Environment, 2003).

8.1 MAINTENANCE

The site Maintenance Department and the site Environmental Department will be responsible for ensuring the following inspections and maintenance are being conducted:

Maintenance Department:

- Maintenance procedures and schedules are posted and followed;
- Fuel dispensing equipment is inspected and maintained regularly;
- Damaged or faulty equipment is not used until repaired and in good working order; and
- Spill response equipment and fire extinguishers are maintained and inspected on or before expiration date.

Site Environmental Department:

- Spill kits are checked, maintained and restocked;
- Regular inspections of fuel dispensing facilities, Waste Management Facility and hazardous material storage areas, vehicles, equipment with fuel, fuel tanks/containers and documented in a logbook;
- Episodic sampling of stained ground or areas with anomalous odours will be completed to identify any spill that has gone (or continues to go) unnoticed; and

- Episodic sampling of surface water, should visual or olfactory evidence be observed.

8.2 PERIMETER ASSESSMENT

Periodic Perimeter inspections will be conducted by the site Environmental Department on a weekly basis and will include:

- Visual or olfactory indications of leaks or spills (i.e. holes, cracks, leaks, etc. in equipment or storage systems);
- Blockage of drains, culverts, or other drainage facilities; and
- Discoloured or dying vegetation or wildlife.

Perimeter inspections will be combined with results of the regular Project water sampling regime described in Section 5.2.3 of the Environmental Monitoring, Surveillance and Reporting Plan (BMC, 2026c) to identify unexpected trends in contaminants in water sampling that may indicate the presence of previously unnoticed leaks or spills.

8.3 HAZARDOUS MATERIAL STORAGE AND TRANSFER AREAS

Inspection of the Hazardous Material storage and transfer areas will include the following items:

- Spills or stains on the ground;
- Material loss from storage containers;
- Storage container condition;
- Emergency shut off systems in place, functioning and clearly visible;
- Spill kits are available, adequate, and accessible; and
- Spill Response Procedures posted for reference, SDS are available.

Additional information is included in the Hazardous Materials Management Plan (BMC, 2026a).

9 REFERENCES

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APPENDIX A: SPILL REPORT FORM

ENVIRONMENTAL INCIDENT REPORTING FORM

GENERAL INFORMATION	
Project Name:	Project Code:
Time/Date of Incident Start:	Time/Date Incident Stopped:
Date of Report:	Project Incident Report Number:
Location:	UTM Coordinates:
Reported To:	Substance Spilled:
Reported By:	Quantity (vol):

CONTACT INFORMATION FOR COMPANY INVOLVED IN INCIDENT	
Company:	**Address**:
Phone #:	**Email**:
Contact Person:	**Position**:

INCIDENT TYPE (CHECK ALL THAT APPLY)			
Encroachment of an Environmentally Sensitive Area (*e.g.* Riparian/Wildlife Buffer) **Please provide details in "Description" section below.**	☐	**Adverse Impacts to Fish/Wildlife (*e.g.* Mortality/Injury)** **Please provide details in "Description" section below.**	☐
Water Quality/Quantity **Please provide details in "Description" section below.**	☐	**Hazardous Material Spills (to ground or water)** **Please provide details in "Description" section regarding:** • Perceives extent of damage • Type, quantity and area of the spill • Containment Procedures • Environmental features near the spill	☐
Disturbance of known or unknown archeological /heritage site **Please provide details in "Description" section below.**	☐	**Air Quality** **Please provide details in "Description" section below.**	☐

Spill reported to external agencies **If yes, describe the receiving environment and substance/quantity spilled.**	☐	**Other** **Please provide details in "Description" section below.**	☐

INCIDENT PROFILE

Weather at time of incident	 ☐ **Clear**	 ☐ **Partly Cloudy/ Variable**	 ☐ **Cloudy**	 ☐ **Showers/ Periods of Rain**	 ☐ **Rain**	 ☐ **Heavy Rain** *(>25mm in 24hr)*	 ☐ **Storm** *(Heavy rain and high winds)*	 ☐ **Snow**

Description and cause of incident:
Description:

Incident witness:

Were there any potential environmental impacts from the incident? (*e.g.,* surface or groundwater contamination, or fish/wildlife mortalities)	**Yes** ☐	**None Observed** ☐

If yes, please describe:

Has the wildlife salvage protocol been followed? (*i.e.,* fish salvage)	**Yes** ☐	**No** ☐	**N/A** ☐

If no, please explain:

Water quality samples collected?	**Yes** ☐	**No** ☐	**N/A** ☐

If yes, attach results of water quality analysis to report in table format. Include laboratory analysis if completed.
If no, please explain:

Have applicable photos and/or drawings been attached to the incident report?	**Yes** ☐	**No** ☐	**N/A** ☐

INCIDENT RESPONSE MEASURES

ACTIONS TO PREVENT INCIDENT RECURRENCE

NOTIFICATION RECORD

Agency Reported to	Contact Information	Agency Contacted		Date Reported	Reported By	Method of Reporting
		Yes	No			
EXTERNAL						
Yukon Spill Emergency Hotline	867-667-7244	☐	☐			
Ross River Conservation Officer	867-969-2202	☐	☐			
CANUTEC	1-613-996-6666	☐	☐			
		☐	☐			
		☐	☐			
		☐	☐			
		☐	☐			
		☐	☐			
		☐	☐			

NOTIFICATION RECORD						
Agency Reported to	**Contact Information**	**Agency Contacted**		**Date Reported**	**Reported By**	**Method of Reporting**
		Yes	**No**			
INTERNAL						
		☐	☐			
		☐	☐			
		☐	☐			

ENVIRONMENTAL MANAGER:

Print Name	Position and Company	Signature	Date

SITE MANAGER:

Print Name	Position and Company	Signature	Date

APPENDIX B: EMERGENCY CONTACT LIST

Emergency Contact List

Role	Name	Location	Contact	Phone Number
Onsite Companies				
Owner	BMC Minerals Ltd	Vancouver, BC		1-778-379-9292
Other 1	TBD	TBD	TBD	TBD
Other 2	TBD	TBD	TBD	TBD
Other 3	TBD	TBD	TBD	TBD
Other 4	TBD	TBD	TBD	TBD
Regional Emergency Numbers				
Hospital	Whitehorse General	Whitehorse, YT		1-867-393-8700
Health Centre	Ross River Health Centre	Ross River, YT		1-867-969-4444
Health Centre	Watson Lake Health Centre	Watson Lake, YT		1-867-536-4444
RCMP		Ross River, YT		1-867-969-2677
Fire Department		Ross River, YT		1-867-969-2222
Yukon Forest Fire Report				1-888-798-3473
Yukon Wildland Fire Management	Clint Wheeler			1-867-863-5271
Yukon Emergency Numbers				
24 hour Spill Hotline	Yukon Spill Emergency			1-867-667-7244

Federal Emergency Numbers				
	Department of Fisheries and Oceans Canada			1-867-393-6722
	Environment Canada			1-867-393-6700
	Transport Canada (CANUTEC)			1-613-996-6666
First Nation Numbers				
Ross River Lands Department	TBD	Ross River, YT		1-867-969-2202
Liard First Nation	TBD	Watson Lake, YT		1-867-536-7901

APPENDIX C: SOIL REMEDIATION AND CONFIRMATORY SOIL SAMPLING FOLLOWING A SPILL PROCEDURE

Soil Remediation and Confirmatory Soil Sampling Following a Spill

BMC Reference: PRO-03-31

Date Issued: October 2023

Revision Number: 0

Controlled / Uncontrolled Copy: CONTROLLED

Review: Annually

	Name	Position	Review/ Approval Date	Approval signature
Owner	K Bergh	VP, Environment and Planning		
Reviewed by				
Reviewed by				
Reviewed by				
Approved by				

1. Purpose

To document the requirements for soil remediation and confirmatory soil sampling following a spill.

2. Scope

To be used by all BMC Minerals employees and contractors involved with soil remediation and confirmatory soil sampling following a spill.

3. Introduction

This Standard Operating Procedure (SOP) provides written procedures for remediation and confirmatory sampling of soil affected by a spill (the "Spill Remediation Plan"). It is intended to be used in conjunction with the Spill Contingency Plan. It is designed to ensure that standardized and consistent sampling procedures for soil sampling are used.

4. Substances

Substances considered suitable for independent remediation in soil, following procedures documented in this Spill Remediation Plan, include releases of:

- gasoline;
- diesel/heating oil;
- heavy oils/lubricants;
- automotive service degreasers/solvents;
- antifreeze/coolant;
- concentrate; and/or
- select Special Waste (waste oil/lubricant, used antifreeze/coolant, used solvents)

Spill remediation of other substances (i.e., oxidizers, explosives, toxic materials, biomedical waste, radioactive substances, and pesticides) is not addressed by this SOP. Should the need arise for spill remediation of these substances advice should be sourced from a qualified professional.

5. Spill Response

Refer to the Spill Contingency Plan for detailed spill response procedure and requirements for personal protective equipment (PPE).

6. Spill Remediation

Remediation efforts will depend on size of spill, location of spill and capabilities of equipment available. For the purposes of this plan, unintended releases to the environment of the substances listed in Section 4 have been classified as "minor" and "major" as indicated below:

- Minor spills: A minor spill is defined by a spill of substances that can be easily, and immediately, contained and managed by the person on site and does not meet the criteria of a major spill.
- Major spills: A major spill is defined by a spill of substances that meets the following criteria:

- spill has entered, or has to potential to, enter a water course;
- heavy equipment is required to remove soils potentially contaminated by the spill;
- involves injury or risk to human life;
- spill is along a roadway or developed public area; and/or
- volume of a substance is above its reporting limit (as defined in the Spill Contingency Plan).

6.1 Minor Spills

Due to their small lateral area and surficial nature, minor spills will be cleaned up immediately using sorbent pads, absorbents, brooms, and shovels. In case of a minor spill, follow the steps indicated in the Spill Contingency Plan for initial spill response (stop of work, personal protective equipment, containment, removal of waste material, storage of waste, and spill reporting).

All surficial material (soil/snow/water) inferred to be potentially contaminated i.e., visual observations of staining and or noted odours is to be removed and disposed of per the Spill Contingency Plan.

6.2 Major Spills

All surficial material (soil/snow/water) inferred to be potentially contaminated i.e., visual observations of staining and or noted odours is to be removed and disposed of per the Spill Contingency Plan. Following excavation of contaminated material, all major spills will be sampled in accordance with Protocol 3 and Protocol 5 of the Contaminated Sites Regulation (CSR).

Soil samples will be recovered from the sidewalls of the excavation limits at regular 5 m horizontal and 0.6 m vertical grid spacing for visual observation and headspace vapour concentration measurements. Soil samples will be recovered from the base of the excavation at regular 5 m horizontal grid spacing for visual observation and headspace vapour concentration measurement. Soil samples will be collected from the sampling equipment with the use of new nitrile gloves for each sample to avoid cross-contamination. Separate portions of the soil samples will be utilized for chemical analyses and for measurement of soil headspace vapour concentrations.

Soil samples will be submitted to the laboratory for chemical analyses based on the highest headspace vapour concentrations, proximity to the groundwater surface, the presence of odours and/or visual signs of staining.

A minimum of five samples must be submitted to the laboratory from the faces of the excavation: one from each wall and one from the excavation floor. From each excavation wall, at least one sample must be submitted to the laboratory for each 10 metres running length and for each 3 metres running depth. If any of the excavated material is highly contaminated, one sample must be submitted to the laboratory for each 5 metres running length and for each 3 metres running depth. In the case of the excavation floor, one sample must be submitted to the laboratory for each 10 metres running length and for each 10 metres running width.

Soil samples selected for laboratory analyses will be placed in ice ice-filled coolers and shipped to the analytical laboratory with the appropriate chain of custody documentation.

During remedial excavation activities, situations can occur whereby excavation limit sample results are received from the laboratory and the sample results indicate that soil exceeding CSR standards is still present on that sidewall (or base). Thus, the excavation continues further in that area and the soil that was represented by that sample is subsequently removed; that sample would then be described as a 'characterization' sample, as it was not recovered from the final excavation limits.

7. Laboratory Analyses

Chemical analyses completed at the laboratory depend on the nature of the product spilled. A summary required analytes for each type of product likely to be encountered is noted in the following:

Gasoline and/or Diesel

- benzene, toluene, ethylbenzene, xylenes (BTEX)
- styrene
- VH(6-10), VPHs
- EPH(10-19), EPH(19-32)
- LEPHs/HEPHs
- PAHs

Heavy Oils and/or Lubricants

- EPH(10-19), EPH(19-32)
- LEPHs/HEPHs
- PAH

Automotive service degreasers/Solvents

- BTEX, styrene
- VH(6-10), VPHs
- tetrachloroethylene (PERC)
- trichloroethylene (TCE)
- 1,1-dichloroethylene
- 1,2-dichloroethylene, cis
- 1,2-dichloroethylene, trans
- chloroethene (vinyl chloride)
- 1,1,1-trichloroethane
- chloroethane (ethyl chloride)
- 1,2-dichloroethane (DCA)

Antifreeze/Coolants

- Ethylene glycol
- Propylene glycol

Concentrate

- CSR metals
- pH

Special Waste (waste oil/waste lubricant)

- EPH(10-19), EPH(19-32)
- LEPHs/HEPHs
- PAH

- Arsenic, barium, cadmium, chromium, copper, lead, and zinc
- pH

Special Waste (used antifreeze/coolant)

- Ethylene glycol
- Propylene glycol
- Arsenic, barium, cadmium, chromium, copper, lead, and zinc
- pH

Special Waste (used solvents)

- BTEX, styrene
- VH(6-10), VPHs
- tetrachloroethylene (PERC)
- trichloroethylene (TCE)
- 1,1-dichloroethylene
- 1,2-dichloroethylene, cis
- 1,2-dichloroethylene, trans
- chloroethene (vinyl chloride)
- 1,1,1-trichloroethane
- chloroethane (ethyl chloride)
- 1,2-dichloroethane (DCA)
- Arsenic, barium, cadmium, chromium, copper, lead, and zinc
- pH

8. Documents and Records

8.1 Internal Documents

- Spill Contingency Plan

8.2 External Documents

- Contaminated Sites Regulations O.I.C. 2002/171. Yukon, Canada, and Protocols

Description of changes			**Authorisation**			
Version #	Date	Change(s)	Developed/ Reviewed By	Approved By	Signed	(Re)issue Date
0	October 31, 2023	New Document	Erin Livingstone	Kelli Bergh		October 31, 2023

APPENDIX D: TABLE OF CONCORDANCE

Reference No.	Proponent Commitment	Where addressed
Project Proposal Section 18.2	The conceptual management plan (presented in the Project Proposal) outlines mitigation measures to minimize potential effects to Surface Water, Aquatic Ecosystems and Resources and Wildlife and Wildlife Habitat Valued Component from Project activities	Spill Contingency Plan
Project Proposal Chapter 15	Risks from spills through truck transportation of concentrates will be mitigated through the application of the Spill Contingency Plan (Section 18.5 of the Project Proposal).	Section 3.5.2 of Spill Contingency Plan
Project Proposal Chapter 18	Any spill that occurs at the Project will be reported through the internal reporting chain of command and will follow the procedures for assessment, prevention, containment, and clean-up, and will be reported using BMC's Spill Report Form. For each specific chemical, the spill response procedure is based on the product type, quantity, and environmental and safety conditions. SDS will be available at the mine site in the Hazardous Materials Management Plan. The SDS sheets will be referenced during any spill response to ensure that proper personal protective equipment is worn, that the chemical or product is handled safely, and that proper emergency and first aid procedures are adhered to. BMC's Emergency Response team will be properly trained on clean-up and disposal methods of each chemical and product used at the Project.	Chapters 2, 3, 4 and 5 of Spill Contingency Plan
Project Proposal Chapter 18	"The general spill response procedure is outlined below. Upon discovering a spill, the following actions will be undertaken immediately: o Identify the substance spilled and hazards to human health, if possible (SDS); o Protect yourself and notify any others in the vicinity immediately; o If safe to do so, turn off any potential sources of ignition and attend to any injuries. Leave the area if it is not safe to be there; o Stop the discharge of the substance, if it is safe to do so; o Contain the spilled substance; o Inform management of the spill; and o Report the spill following the established reporting procedure. "	Chapter 3 and 4 of Spill Contingency Plan
Project Proposal Chapter 18	Reagents will be transported to the Project in appropriate containers by contracted suppliers. The reagent mixing area on site will be a fully contained area equipped with sumps and sump pumps to return any spills to the appropriate stock tank. The reagent containment area will be designed to accommodate 110% of the volume of a spill from the largest stock tank or mix tank in the area. All reagent mixing and stock tanks will be equipped with level sensors to prevent overfilling. Any reagent spills on site will be responded to as per the SDS and will be based on the product type, quantity, and environmental and safety conditions.	Chapters 3 and 6 of Spill Contingency Plan
Project Proposal Chapter 18	Spill kits will be located at the following locations throughout the Project area (including but not limited to): o Fuel Storage Areas; o Machine Shop; o Mining Operations; o Process Plant; o Paste Plant; o Explosives Facility; o Camp;	Section 3.4 of Spill Contingency Plan

Reference No.	Proponent Commitment	Where addressed
	o Reagent mixing area; and o Vehicles carrying hazardous materials including fuel.	
Project Proposal Chapter 18	"Spill Response kits will include a yellow pack container labelled "Spill Kit" and placed at all previously noted locations. Additional smaller kits will be required in all site vehicles/equipment (where practicable, for instance some underground equipment do not have room for spill kits). Spill kits will all include at a minimum: o Spill Instruction Sheet; o Laminated List of Contents; o Absorbent Pads (oil, gas, grease); o Universal Absorbent Pads; o Linkable oil booms; o Oil Gator Absorbent; o Absorbent socks; o Leak repair putty; o Heavy duty disposal bags; o Protective Clothing – Gloves (Chemical Master Gloves), Coveralls (Tyvek splash suits); and o Eye Protection. "	Section 3.4 of Spill Contingency Plan
Project Proposal Chapter 18	Additional spill equipment will be available at the mine site for larger spills and will include: o Heavy equipment and machinery (e.g., dozer, loader, excavator, bobcat, grader, and dump truck); o Shovels, rakes, axes; o Pails and drums; o Pumps and hoses; o Emergency flagging and triangular reflectors; and o Breathing Apparatus (as required).	Section 3.4 of Spill Contingency Plan
Project Proposal Chapter 18	BMC will develop a detailed training program to ensure all employees and contractors are aware of their responsibilities and appropriate practices that everyone on site must adhere to. The emergency response team will receive training as necessary for immediate spill response. Spill response employees will be trained in: o Workplace Hazardous Materials Information System; o Transportation of Dangerous Goods; o Spill Training (Spill Responder); o Site specific spill orientation including site procedures, location of spill kits and type of substances stored and used on site; o Safety orientation including reference to the location of the MSDS sheets and to proper chemical handling and storage procedures; and	Chapter 5 of Spill Contingency Plan

Reference No.	Proponent Commitment	Where addressed
	o Workers' Safety and Compensation Act and regulations and use of appropriate personal protective equipment and chemical/product handling procedures.	
RRDC Screening Review (Groundwater)	The Spill Contingency Plan will be in place to deal with any contamination resulting from spilled hydrocarbons. The Spill Contingency Plan will outline the appropriate response depending on type and size of spill. Any hydrocarbon contaminated soils will be remediated in the on-site Land Treatment Facility.	Chapter 3 of the Spill Contingency Plan
RRDC Screening Review (Groundwater)	In the event of a truck accident involving a vehicle carrying tailings to the Class A Storage Facility, an investigation will take place immediately to document and delineate and tailings that were spilled. Any spilled tailings will be excavated back into a truck and the soil/vegetation will be tested to ensure that all tailings were collected. The area of the spill will then be reclaimed using material from the overburden and soil stockpiles and seeded. Further, onset of acid generations of the Class A tailings is anticipated to take years and no acid leachate would occur during the time required to clean up the spill. Additionally, given the anticipated moisture content of the tailings being 15%, no air dispersion from the trucks during transportation is anticipated. Further the haul trucks will have covers.	Section 3.5.1.4 of the Spill Contingency Plan
Decision Document Term #12.	The Proponent shall ensure that LFN and RRDC have opportunities to participate in and influence the development of environmental and socioeconomic management plans and closure objectives developed for the Project to ensure that Kaska can collaboratively design, collect, report, manage and communicate the results of the monitoring programs and adaptive management plans to their community members. The Proponent will make participant funding available to Kaska to support the incorporation of Kaska perspectives on Kaska laws as well as support the inclusion of Kaska members, including Elders and land stewards, in the regulatory process, the monitoring of impacts, the implementation of adaptive management and the Proponent's commitments for the life of the Project (regulatory to reclamation).	Section 1.3 of the Spill Contingency Plan
Decision Document Term #13.	The Proponent shall ensure that LFN has the opportunity to be part of the Proponent–Kaska environmental, cultural and heritage management program.	Section 1.3 of the Spill Contingency Plan