





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
1	The RRM (RRM) will monitor and mitigate air emissions, particularly dust, through implementation of current industry best management practices.	The air quality monitoring program consists of two air quality monitoring stations located east and south-east of the project site. Monitoring of relevant air emissions parameters dictated in ECA 04172-A2LR4V is conducted by New Gold Environment staff.	Air Quality Stations installed May 2015
		During 2017, there was one exceedance of the dustfall MOECC AAQC measured in April at the Gallinger station. The laboratory noted some particulate, flies and black particles in the jar upon reception. The second exceedance was reported in October at the Gallinger station. An ash analysis performed at the lab indicated that 96% to 98% was organic material such as bird droppings, insects and pollen. Therefore the two reported exceedances in 2017 were actually not air quality exceedances.	Monitoring is ongoing for life of mine.
		Fugitive Dust Best Management Practices Plan (BMP) for both construction and operations were implemented during 2017. Best management practices followed included using water as dust suppressant on major haul roads, application of calcium chloride on major light vehicle routes during non-freezing conditions. In addition, speed limits on and around site are controlled. Baghouses and other dust suppression equipment are used at the processing plant and crusher. Drills used in the open pit are equipped with dust curtains or cyclone dust capture systems. Auxiliary aggregate crushers also use water dispersed by spray bars during non-freezing conditions. Commercial traffic is limited to site access along the east access or Teeple Road.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
2	Dust Management Plan 2. A fugitive dust best management practices plan will be prepared to identify all potential sources of fugitive dusts, outline mitigative measures	Fugitive dust best management practices plan was prepared as per ECA #0412-A2LR4V in February 2016 for both construction and operations phases of the RRM. The plans identify all potential sources of dust and mitigation measures to be employed. The plans also provide inspection schedules and recordkeeping documents.	ECA Application Submission – November 14, 2014;
	that will be employed to control dust generation, and detail the inspection and recordkeeping required to demonstrate that fugitive dusts are being effectively managed.		Fugitive Dust Best Management Plants submitted to MOECC February 4, 2016;
			Updated Water Use Plan for dust submitted to MOEC December 14, 2016.





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
3	Sound will be monitored during construction, operations and active closure phases consistent with Ministry of the Environment (MOE) requirements	Equipment sound level measurements at the RRM site were conducted by Amec Foster Wheeler on September 27 through 29, 2017. A Larson Davis Sound Track 831 Type I sound level meter equipped with a windscreen was used for the measurement. The Model 831 uses a Larson Davis Model PRML831 preamplifier and a PCB Electronics Model 377B02 precision microphone, which have been factory calibrated with the SLM unit. The SLM meets IEC 61672-1 Type 1 requirements. The sound level meter was field calibrated with a Larson-Davis Model CA200 precision acoustic calibrator before and after the measurements. All measurements were conducted in accordance with MOECC NPC-103 measurement protocols. The sound level meter was programmed to record 1-second Leq, Lmin and Lmax. The applicable guideline for the RRM site is the Ministry of the Environment and Climate Change (MOECC) Environmental Noise Guideline NPC-300, "Noise Assessment Criteria for Stationary Sources and for Land Use Planning." The RRM site is located in a rural area which is best described as a Class 3 area in accordance with the area classifications defined within Publication NPC-300. On January 24, 2018 an updated Acoustic Assessment Report for Early Operations was submitted to MOECC as per ECA#0412-A2LR4V Cond. 4.1(b)	Annual onsite sound level monitoring conducted September 27 to 29, 2017.





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
4	NG (NG; previously Rainy River Resources) expect that the monitoring required will include: total suspended particulate (TSP) and metals on the TSP size fraction, PM10, dustfall and passive monitoring for NO2 and SO2. NG commits to conducting this monitoring which is also expected to be an approval requirement.	Initiated in May 2015, air quality monitoring occurs at two locations on the project site that have been reviewed and approved by MOECC. These two monitoring locations assess for all of the parameters outlined in this condition. In February 2016 New Gold submitted an Ambient Air Quality Plan to the MOECC as per Environmental Compliance Conditions which was approved by the Ministry in November 2016. Since the installation of the stations MOECC has been onsite to inspect them in September 2015 and July 2016. These inspections revealed no significant deficiencies.	Ambient Air Quality Plan submitted February 2016 and approved by MOECC in November 2016.





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
5	The best management plan related to fugitive dust management, source control and operational constraints required by the Provincial Environmental Compliance Approval will be provided to Environment Canada (EC) for review and will be fully implemented prior to the construction phase.	The Canadian Environmental Assessment Agency was notified that a plan dated July 23, 2014 was submitted in support of the ECA application. This same plan was provided to the MOECC for review and approval in 2014. An updated version of the Fugitive Dust Management Plan for operations and for construction was submitted to MOECC in 2015 and implemented during 2015 (early construction phase). As per condition 5(11) of ECA No. 5178-9TUPD9 an updated Management Plan of water used for dust suppression and other industrial uses was submitted to MOECC in December 2016.	ECA Application Submission – November 14, 2014; Fugitive Dust Best Management Plants submitted to MOECC February 4, 2016; Updated Water Use Plan for dust submitted to MOEC December 14, 2016.
6	A transboundary notification under the Canada - U.S. Air Quality Agreement will be filed prior to operation.	This notification was filed on September 17, 2014.	Completed September 17, 2014





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
7	Planning measures aimed at reducing fuel and power consumption for the RRM site include the following: • Using larger, more fuel efficient trucks for material transport; • Using optimum insulation in buildings to reduce heat loss and heat recovery from equipment where practical; and • Maintaining site equipment and vehicles in good working order through regular preventative maintenance.	In 2017 the following measures and plans were implemented to reduce fuel and power consumption; • Energy Management Plan developed; • maintenance plans for fleet were redesigned; • more frequent air and fuel filter servicing was conducted; • purchased emission testing equipment for fleet and • on site mechanics and preventative maintenance personal. Energy reduction from heating will continue to be developed as we replace temporary structures such as the truck wash and maintenance shop with permanent buildings.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
8	Monitoring of air quality will occur during construction, operations and active closure phases per Section 13.1.1 of the Final EA Report.	Monitoring has been ongoing at the RRM since May 2015. Two air quality sampling stations were established in May 2015: one to the south of the Site near the beginning of the Highway 600 re-route on Tait Road, and one to the east of the site on Gallinger Road. During 2017, there was one exceedance of the dustfall MOECC AAQC measured in April at the Gallinger station. The laboratory noted some particulate, flies and black particles in the jar upon reception. The second exceedance was reported in October at the Gallinger station. An ash analysis performed at the lab indicated that 96% to 98% was organic material such as bird droppings, insects and pollen. Therefore the two reported exceedances in 2017 were actually not related to air quality. Air Quality Monitoring Reports for each quarter of 2017 can be found in the supporting documentation in Appendix C.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
9	Sound mitigation measures will be used, such as selection of quieter equipment. Implementation of sound abatement strategies to dampen sound infiltrating habitats and migratory bird nesting areas surrounding high traffic areas of the mine.	Measures that were implemented during 2015 and continued into 2017 to reduce sound included; - Specific trucks that allow exhaust to pass through the truck box rather than directly through the exhaust pipe (can muffle sound); - Reducing size of blasts where appropriate and scheduling those blast only at 1100 and 1500; - Tree buffers maintained where practical; - A qualified consulting firm was contracted to update the acoustic model in 2017.	Ongoing
10	Should the final equipment selections determine through detailed engineering and sound level assumptions vary materially from those presented in the Environmental Assessment (EA), an updated assessment with the new information will be prepared as part of the detailed design and approvals application(s) for the RRM.	Equipment selections determined through detailed engineering and sound level assumptions varied materially from those presented in the Environmental Assessment (EA). An updated acoustical assessment was researched and prepared during Q4 of 2017 as Rainy River Project transitioned from construction to operations. A copy of this assessment can be found in the supporting documentation Appendix C.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
11	The maximum charge size per delay for blasting is limited to 1,000 kg as the vibration and overpressure mitigation option. If the charge size is larger than 1,000 kg per delay, the vibration and overpressure levels emanating from RRM blasting operations will be reassessed in a detailed study to confirm that the predicted levels are within guideline limits.	In the 5.5 - 6 3/4 inch drill patterns, it's planned to have 3 holes (199kg each) going off in close proximity (within 8ms of each other). On 9 inch, the design have 2 holes on average going off (330kg each) in close proximity. Therefore our average MIC can be estimated at 597-660kg per shot.	
12	NG will continue to work actively with local residents throughout the period of mine construction, operation and active closure to further manage and reduce any disturbances due to air and sound emissions to the extent possible, as well as for other effects.	Through regular communication, New Gold has established positive relationships with neighbours who are closest to the project mine site. When neighbours have any concerns or comments, they contact the Community Coordinator or Community Manager directly, who then ensure follow-up and closeout. In 2017, neighbours joined the New Gold team for a site visit and lunch at the accommodation facility. New Gold continues to communicate with Emcon regarding dust management issues when advised by local neighbours of dust concerns. In late summer 2017, some neighbours commented on noise and vibration from one blast. No exceedances were recorded, which was communicated back to the neighbours.	Ongoing



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
13	Collectively and individually, the processes and water management strategies proposed for the RRM are Best Management Practices and/or Best Available Technology Economically Achievable (BATEA), and NG has committed to the use of such processes and water management strategies in the Final EA Report. Examples of such BATEA committed to by NG:	During 2017 the mill began operating. In plant treatment of tailings is done using SO2/air in the cyanide destruction tank, where cyanide and metallocyanide complexes are oxidized to cyanate ion using copper sulphate as a catalyst. The cyanate reacts with water to form ammonia and carbon dioxide. Free metal ions are precipitated with the addition of lime to form insoluble metal hydroxides and absorbed onto tailings particle solids, settling out of the slurry in the tailings management area. Excess SO2 is used in the process to ensure complete stoichiometric oxidation of cyanide. In 2017 Cell 1 of the Tailings Management Area (TMA) was constructed and currently treated tailings are pumped from the mill to the cell. The remaining TMA will be completed in 2018.	
	 Use of the in-plant SO2/Air process for cyanide destruction and metal precipitation, as well as to extended post SO2/Air treatment effluent aging in the TMA (TMA) and water management ponds, followed by constructed wetland treatment; Detailed plans and designs to 	The constructed wetlands and water discharge pond are scheduled for construction 2018. Potentially acid generating rock (PAG) was managed by identification through chemical testing and segregation into stockpiles within the low grade and East Mine Rock stockpile areas, as per requirements of the geochemical monitoring plan. Progression reclamation will begin along lower levels of the low grade stockpile as discussed in the Rainy River Project Closure Plan (January 2015).	
	manage potentially acid generating rock (PAG) on site, including ongoing progressive reclamation at the stockpile to limit acid generation, with drainage from this stockpile reporting to the mine rock pond, for re-use as part of the mill process water supply	Drainage from low grade and east mine rock PAG stockpiles will report into the Mine Rock Pond in 2018. Construction and commissioning of this structure was not completed until mid December of 2017. Recycling of water from the Mine Rock Pond for re-use in the mill process water supply will commence in 2018. The current drilling and blasting contractor on site, Dyno Nobel, made switch from using an ANFO emulsion to a straight emulsion at the beginning of 2017.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	thereby reducing fresh water requirements. Dissolved metals associated with east mine rock stockpile drainage would ultimately report to the process plant SO2/Air and hydroxide precipitation circuit, and then to tailings; • Use of emulsion and/or emulsion blend explosives as a means of limiting ammonia residuals from the use of blasting agents at source; and • Collection of site runoff and seepage as per MMER (MMER), and to maximize the use of near 100% contact water recycle for the processing plant water supply.	As per MMER regulations, collection of site runoff and seepage was directed into the Water Management Pond and other on-site holding ponds. Discharges to the environment from on-site holding ponds was permitted after laboratory results confirmed that water contained in these structures met effluent discharge criteria as per ECA 5178-9VJQ2J.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
14	Surface water runoff will be diverted from entering the pit or flowing through stockpiles by ditching or other means.	During 2017, surface water was diverted from stockpiles and the open pit via temporary ditching systems. Due to construction setbacks associated with permitting delays, the completion of permanent open pit dewatering systems caused the project to develop temporary in pit sumps to handle runoff. Water contained within these sumps was sampled per ECA and MMER requirements and when necessary treated for suspended solids and ammonia. If discharge to the environment was not required, it was sent to either the Mine Rock Pond or the Water Management Pond to be used in ore processing.	Ongoing
15	Open pit dewatering water will be contained and if necessary, treated before it is discharged to the environment.	Construction delays in 2017 forced the implementation of temporary water management plans to reduce the volume of water entering the open pit. These plans included construction of temporary in-pit water collection sumps. Approvals from required regulatory agencies were obtained. This water was then recycled for process plant start up. In the event that water was discharged to the environment it was first sampled as per ECA and MMER requirements and if necessary treated for suspended solids and ammonia.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
16	In regards to final reclamation, the open pit will be flooded at closure to create a pit lake either passively through natural groundwater entry and precipitation inputs; or by active enhanced flooding. Discussions will be held with the various government agencies to determine the optimal balance between maintaining Pinewood River flows and filling the open pit on an expedited basis.	In October 2018 a draft closure plan amendment was submitted to the Ministry of Northern Development and Mines for the Rainy River Mine. The reason for the amendment was to address the transition of the mine from its construction phase to its operational phase. Section 9.3.1 discusses the staged approach to flooding the open pit at closure which is expected to take between 60 to 75 years. Water inputs will include water from the Mine Rock Pond, seeps from beneath the East Mine Rock stockpile and potential water runoff from the TMA dams. Additional inputs will be from natural sources (ie; rain, snow, groundwater).	
17	Enhanced pit flooding using the West Creek source is not under consideration by NG and has been clarified in the Draft Closure Plan submitted for review, pending discussions and further direction from various government agencies.	The process for flooding the open pit at mine closure is discussed in commitment number 16. The use of West Creek as a source to provide water for flooding the open pit is not being considered by New Gold.	
18	Pit lake water quality will be monitored regularly as part of the post-closure monitoring program.	The mine is currently in an operational phase and ore is being extracted from the open. This commitment will be addressed at mine closure.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
19	Should it be determined that future treatment is needed for stockpile runoff / seepage and overflow from the pit at closure, passive treatment options would be fully considered during the detailed design stage.	This commitment will be reviewed at the time of mine closure.	
20	Ditches (and ponds as appropriate), will be established around the stockpiles to collect and manage runoff. Diversions will be sized to convey the environmental design flood. All sedimentation ponds will be designed with a retention period to meet the MMER discharge requirement for total suspended solids. The design criteria for perimeter ditching in this area (east mine rock stockpile and low grade ore stockpile) has been increased to the 100-year return period condition, as these stockpiles will contain PAG materials.	During the construction phase (2015 to 2017) temporary ditches and sedimentation ponds also referred to as sumps were constructed in various locations around the project. The intent of these structures was to collect and manage runoff. These structures were designed by qualified engineers and reviewed and approvals obtained by government agencies where applicable. Water captured in these systems was sampled, in some cases treated for suspended solids or ammonia and discharged accordingly to meet Provincial Water Quality Objectives (PWQO) and the Metal Mining Effluent Regulation (MMER). As construction has advanced and the mine has entered into an operational phase permanent systems are being designed, permitted by government agencies and constructed. In 2017 a design was created for the East Mine Rock Stockpile that satisfies this commitment. The construction of the permanent collection ditches is scheduled for 2018.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
21	The retention time for sediment ponds 1 and 2 has been increased to 12 days, subject to review and acceptance by the MOECC.	Design of structures in accordance with this commitment was initiated during 2015 or as refined through the Provincial environmental approval process. During 2016, temporary ponds were constructed to capture runoff from small overburden piles which continues to be used in 2017. The construction of the permanent Sediment Ponds 1 and 2 is scheduled for 2018 and will be subject to approvals from MNRF and MOECC.	Scheduled for 2018
22	PAG mine rock (and ore) will be managed, with drainage from the PAG mine rock and ore stockpile reporting to the mine rock pond, for re-use as part of the process plant water supply.	The Mine Rock Pond (MRP) was not completed and commissioned until late in December of 2017. Prior to that date, drainage from PAG mine rock and ore stockpiles was collected into the Mine Rock Pond seepage collection system before discharge to the environment, as per provincial regulatory approval ECA# 5781-9VJQ2J requirements.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
23	The deepest local till layer resting directly on bedrock contains PAG material and will be visually segregated and treated as PAG material unless otherwise determined, and will be stockpiled within the east mine rock stockpile, or disposed of in a manner where acid rock drainage (ARD) potentials will be controlled. A detailed mine rock segregation program / management strategy will be developed around the distribution of non-potentially acid generating (NPAG) and PAG materials, and a program of ongoing testing to be carried out during mining operations of the mine rock being removed.	A Geochemical Monitoring Plan for the Construction and Operation Phases was issued in accordance with MOECC ECA 5178-9TUPD9 requirements, and has been implemented at the RRM site. Monitoring was ongoing during 2017.	
geochemical data to identify that portion of the till overlying the bed which requires handling as PAG material, based on the characteri of the clasts (loose stones) contatherein. Segregation is commonly utilized and MEND 5.4.2d (MEND Manual, Volume 4, Prevention ar	portion of the till overlying the bedrock		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	applicable where a clean separation can be made and where a disposal location is available for the PAG material - both of which apply to the RRM. This PAG till would be treated as PAG material and would be directed to the east mine rock stockpile for disposal along with PAG mine rock.		
23 cont	NG is conducting a detailed sampling and analysis program of the overburden within the pit area. The study will be used to delineate the thickness of till over the bedrock that may contain locally derived PAG rock	Periodic sampling of till is ongoing during open pit stripping of till. Results have been in line with the initial interpretations.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	materials so that these materials can be segregated during operations and placed into the East Mine Rock stockpile, or otherwise maintained in a saturated condition. Periodic confirmation analysis will be conducted during the (open pit) stripping program to ensure that the initial interpretation of the thickness of till requiring handling as PAG remains accurate. A draft mine rock and overburden management plan was submitted with the Draft Closure Plan that will be finalized and submitted with the Final Closure Plan for filing with the MNDM later in 2014. It will also be provided to EC per their request. The plan will be revised during operations if		
	necessary to ensure it remains current and as part of future Closure Plan amendments.		





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
24	 Geochemistry monitoring: Runoff and seepage related to tailings and stockpiles will be monitored as per surface and groundwater monitoring; Blast hole sampling from open pit operations for mine rock segregation will be carried out throughout the open pit operations phase; Tailings samples will be collected at regular intervals during the mine operations phase; and Field trials will be carried out during all or a portion of the mine construction and operations phases as required to generate data need to confirm modeling results. 	A Geochemical Monitoring Plan for the Construction and Operation Phases was issued in accordance with MOECC ECA 5178-9TUPD9 requirements, and has been implemented at the RRM site. Monitoring was ongoing during 2017. A field capping trial was commissioned in 2017.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
25	PAG material would only be used for fill material in areas where it can be maintained in a saturated state to exclude oxygen and inhibit sulphide oxidation. These uses may include underground backfill and construction of the upstream portion of the TMA dams.	All the PAG that has been encountered during 2017 has either been stockpiled in the East Mine Rock Stockpile, used in the pit (for road building and padding in the overburden) or stockpiled in the Tailings Management Area and used for dam wall construction.	
26	Progressive rehabilitation of mine rock and overburden stockpiles will be undertaken where practical once the maximum height of each stockpile has been reached and/or as each lift is completed.	During 2017, mine rock and overburden piles did not require rehabilitation. Some rehabilitation in the form of shaping and compaction occurred at the topsoil salvage piles in the Water Management Pond area and the Mine Rock Pond area. Moving further into operations, wherever reasonable, areas will continue to be rehabilitated, re-seeded and used for future reclamation.	
27	Encapsulation of the east mine rock stockpile under a multi-layered cover is proposed with a long term goal of controlling ARD.	In October 2017 New Gold submitted an amended Mine Closure Plan for the Rainy River Mine to the Ministry of Northern Development and Mines. The Encapsulation of the East Mine Rock Stockpile under a multi cover is detailed in section 6.2.5. The process is scheduled to begin once the first lift/level of the stockpile is in place.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
28	As part of the geochemical characterization studies for the project, NG committed to an extended monitoring period of kinetic cells to both demonstrate and continue to evaluate the robustness of the geochemical results.	In 2017 Kinetic cell monitoring was ongoing as required to support the geochemical characterization studies. As of December 31, 2017 the following kinetic tests remained active: • 7 laboratory kinetic tests ongoing from previous years • 3 waste rock humidity cells • 2 tailings humidity cells • 2 tailings columns 17 laboratory tests were also commissioned in 2017 and involved; • 3 waste rock columns testing particle size sorting • 14 waste rock columns testing low sulphide waste rock	
29	The run-of-mine stockpile is the temporary, working stockpile for the processing plant; the low grade ore stockpile is proposed to be depleted during the latter part of operations. As a contingency only, it is proposed that should an ore stockpile remain at closure, it will be managed similar to PAG in the East Mine Rock Stockpile with a multi-layer cover and seeded. Runoff and seepage will be directed to the open pit as part of the passive water management system.	At closure, should the low grade ore stock remain, section 9.15 of the Rainy River Project Closure Plan (January 2015) stipulates that "it will be considered part of the East Mine Rock Stockpile and reclaimed in the same manner	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
30	Site runoff and seepage will be collected, managed and treated per the Provincial and MMER requirements.	Completed as required during 2017 in accordance with Provincial approvals (including ECA 5781-9VJQ2J and 5178-9TUPD9) and the MMER.	
		Surface water was monitored on and off site as per the monitoring program.	
		In 2017 the following exceedances occurred and were reported to the appropriate agencies and Aboriginal Communities;	
		Three instances of elevated daily total suspended solids concentration including one instance of elevated monthly total suspended solids, and one instance of MMER acute toxicity of rainbow trout. Three occurrences of sediment releases at the following locations; Pinewood River (February 21), Mine Rock Pond Polishing Pond (July 5) and Remnant Clark Creek (October 2)	
31	The overall site footprint and watershed capture will be minimized to the extent practical, so as to minimize the quantity of runoff and seepage requiring treatment and management.	This commitment was incorporated into the design of the Rainy River Mine.	Completed during design





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
32	West Creek pond and West Creek diversion flows will be measured on a continuous basis using water level transducers, supported by monthly manual measurements during the winter period, when transducer results experience interference caused by ice pressure.	The West Creek Pond and Diversion were completed and commissioned in June 2017. Dry weather conditions through the summer and fall of 2017 did not allow for the installation of water level transduces in the absence of flow. Water level transducers will be installed in 2018.	
33	The West Creek pond will only contain natural, non-contact water. The West Creek diversion channel will be kept separate from the constructed wetland downstream of the TMA, so as not to mix the natural creek water with excess water discharged from the TMA.	The West Creek Pond and Diversion channel were commissioned in 2017 and were designed to meet the requirements of this condition. Construction of the constructed wetland did not commence in 2017.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
34	West Creek Diversion will be positioned far enough from the pit perimeter to ensure integrity and stability and is expected to provide like-for-like fish habitat replacement.	The West Creek Diversion was completed and commissioned during 2017. It was designed and constructed to meet the requirements of this commitment including the implementation of fish habitat features.	Complete 2017
35	The West Creek diversion will be permanent, and there is no further consideration being given to diverting any flows from this creek into the open pit to help accelerate pit flooding at or following closure.	To date the design of the project is consistent with the requirements of this commitment. Please refer to commitment number 16	
36	There will be secondary containment in place for tailings and contact water pipelines at the crossing of West Creek.	In 2016 double contained tailings pipelines were drilled underneath West Creek to handle the transportation of tailings and water.	Completed 2016





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
37	A reliable water source for process plant operations and ancillary uses will be generated by maximizing the rate of water recycled to the process plant. Water demands are expected to be met by capturing and reusing the effluents and contact water within the site footprint.	The Process Plant became operational in Q4 2017. Due to construction delays with the Mine Rock Pond plant process water was taken from the open pit in 2017. Moving into 2018 the majority of water will be taken from the Mine Rock Pond and recycled in the WMP. The Operational Environmental Compliance Approval # 5178 9TUPD9 outlines the water recycled system for the project.	
38	Water will be taken from the Pinewood River for the purpose of developing an initial water inventory, only during the construction phase. NG does not intend to take water directly from the Pinewood River thereafter, except possibly for contingency purposes.	In 2017, water was taken from the Pinewood River to develop the initial water inventory in the Water Management Pond. The water taking commenced on April 26, 2017 and continued through to November 7, 2017, dependent on minimum threshold flows in the Pinewood River and other Permit to Take Water Conditions. A total of 921,339 m3 was taken from the Pinewood River during 2017 to develop the initial water inventory. As 2017 was a dry year, it may be necessary to take water from the Pinewood River during the 2018 Spring Freshet as the initial water inventory volume was not met in 2017. After the initial water inventory volume is met, water taking from the Pinewood River would be on a contingency basis.	
39	Water recycle will be maximized, using approximately 100% water recycle for the processing plant water supply.	The Process Plant became operational in Q4 of 2017. Due to construction and permitting delays the use of the Mine Rock Pond as the water supply source for the plant wasn't available so water for processing was taken from the open pit and was recycled during processing. Moving into 2018 the Mine Rock Pond will become a source for process water and water recycle will occur between the plant and the Water Management Pond.	



Description	Status 2017	Date Completed (where applicable) 2017
Local area lakes will not be used for process water supply for the RRM.	The Rainy River Mine was designed to not require the need for process water supply to be taken from area lakes. This commitment was in compliance during 2017.	
All process reagents and materials, and wastes, will be handled and stored responsibly, according to supplier and safety guidance, regulatory requirements and industry best practices.	During 2017 process reagents, materials and wastes were handled in the following manner; Construction Contractors; Had designated storage areas and appropriate containment for used oil and other hazardous materials associated with mechanical repairs and maintenance to heavy equipment. Construction contractors were registered with the governments Hazardous Waste Information Network (HWIN) and were responsible for the transportation of hazardous waste off site using qualified hauling companies. New Gold Staff would occasionally inspect these storage areas to ensure appropriate storage methods where being implemented. Mill Operations; All reagents used in ore processing are stored in dry storage facilities either within the mill or adjacent buildings. All reagents shipped to site are conducted by licenced transportation companies. When products arrive on site they are offloaded by New Gold operators who have obtained Transportation of Dangerous Goods Training. Site Wide In 2016 New Gold implemented a process where all new materials being purchased by the company undergo a review of the Material Safety Data Sheets	
	Local area lakes will not be used for process water supply for the RRM. All process reagents and materials, and wastes, will be handled and stored responsibly, according to supplier and safety guidance, regulatory requirements and industry	Local area lakes will not be used for process water supply for the RRM. The Rainy River Mine was designed to not require the need for process water supply for the RRM. The Rainy River Mine was designed to not require the need for process water supply for the RRM. During 2017 process reagents, materials and wastes were handled in the following manner; During 2017 process reagents, materials and wastes were handled in the following manner; Construction Contractors; Had designated storage areas and appropriate containment for used oil and other hazardous materials associated with mechanical repairs and maintenance to heavy equipment. Construction contractors were registered with the governments Hazardous Waste Information Network (HWIN) and were responsible for the transportation of hazardous waste off site using qualified hauling companies. New Gold Staff would occasionally inspect these storage areas to ensure appropriate storage methods where being implemented. Mill Operations; All reagents used in ore processing are stored in dry storage facilities either within the mill or adjacent buildings. All reagents shipped to site are conducted by licenced transportation companies. When products arrive on site they are offloaded by New Gold operators who have obtained Transportation of Dangerous Goods Training. Site Wide In 2016 New Gold implemented a process where all new materials being



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
		intent of this review is to ensure appropriate product use as well as appropriate handling and containment practices are in place.	
42	Any chemical spills within the process plant / chemical storage areas will be controlled through provision of secondary containment as appropriate, and will not enter the environment. Spills of potentially hazardous materials during transport, or from on-site material storage and handling facilities will be managed. Measures will be taken to prevent and clean up any hydrocarbon spills (and other spills) at source to ensure such materials do not enter surrounding waters as practical. Spills will be reported to the MOECC and other appropriate agencies per the requirements of the Ontario Environmental Protection Act.	Chemicals to be used in the process plant are stored indoors to protect against spills to the environment. In 2017, 13 spills (project wide) were reported to the MOECC as per requirements of the Ontario Environmental Protection Act. All reports submitted contain clean up details and mitigation measures to ensure the spill does not reoccur. Internally New Gold uses a computer program called InControl to capture spill information, clean up tasks, responsible individuals and reporting information. This system insures that the spill is cleaned up appropriately in a timely manner. Information related to the spills reported to MOECC can be found in the Supporting Documentation for Appendix C.	
43	The TMA dams will meet strict regulatory requirements including the requirements of the Provincial Lakes and Rivers Improvement Act and will be constructed to withstand the probable maximum flood and	Section 5.6.1 of the Rainy River Mine Comprehensive Closure Plan Amendment (October 2017) outlines the Geotechnical Design Criteria for the TMA dams and Water Management Pond dams (WMP). It indicates that; - the dams have been designed to meet the most severe flood and earthquake criteria being the probable maximum flood and maximum	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	maximum credible earthquake. A remedial action plan would be developed in consultation with appropriate government agencies in the event of dam breach.	credible earthquake in accordance with the Ontario Lakes and Rivers Improvement Act requirements. - The designs were supported by geotechnical investigations of subsurface conditions conducted by Klohn Crippen Berger (2010) and AMEC (2011, 2012, 2013) - Emergency spillways will be provided for each stage of the TMA dams and WMP to safely pass the probable max flood - Adequate freeboard will be maintained in the TMA and WMP to contain he environmental design flood corresponding to a 100-year 24 hour storm event - all spillways will be rock armoured to withstand erosion from the flow rate - New Gold has successfully obtained appropriate LRIA permit approvals for the construction of all onsite dams. - An Operational Maintenance and Surveillance (OMS) manual was submitted to the MNRF as per conditions of the LRIA and accepted in August 2017. A copy of the OMS can be found in the Supporting Documentation for Appendix C.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
44	Runoff and seepage from the TMA and stockpiles will be captured, monitored, and either released to the environment if applicable criteria are met and/or re-used in the process plant during operations. Cyanide and metal concentrations in the TMA seepage and all treated effluent discharges to the environment will be controlled through the use of in-plant cyanide destruction and heavy metal precipitation, augmented by extended effluent aging in the TMA ponds.	Detailed design during 2017 was consistent with this commitment. Permanent seepage collection ditches and sumps were completed around the Water Management Pond and all of the completed Tailings Management Area with systems in place to pump the runoff and seepage back into either the Water Management Pond or the Tailings Management Area to allow for extended effluent aging.	
45	All active pipelines will be inspected twice per 12 hour shift and informally at other times. Should flow unexpectedly lessen or stop in a pipeline, an inspection will be immediately conducted.	The surveillance and inspections of active pipelines is outlined in Section 7.1 of the Rainy River Mine Operation Maintenance and Surveillance (OMS) for Manual Water Management Structures (WMS) dated August 2017. The OMS was reviewed by the Ministry of Natural Resources and Forestry as part of the Lakes and Rivers Improvement Act Approval Process for the construction of the dams. Should flow unexpectedly lessen or stop in a pipeline, a special inspection will be carried out immediately as outlined in Section 7.2 of the OMS Manual for WMS. A copy of the OMS can be found in the Supporting Documentation at the end of Appendix C.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
46	The exposed tailings beach will be covered at closure with a layer of overburden, with flooding of the remaining tailings with a layer of water to prevent the tailings from oxidizing over the longer term. This will ensure that the tailings pond water remains of high quality, such that it will not pose a threat to wildlife.	The original mine closure plan filed in 2015 and the draft amendment submitted in October 2017 outline that at the end of the operations phase a low permeability overburden cover will be placed on the upstream side of the dam around approximately two thirds of the perimeter. The remaining one third of the length being reclaimed at closure. The cover will be seeded and armoured with nonacid generating rock. The remaining exposed tailings will have a permanent water cover of approximately 2m.	
47	NG commits to maintaining the deposited tailings during the post closure period in a saturated condition in perpetuity to prevent the generation of ARD. NG also commits to developing and completing a monitoring plan which evaluates the integrity of the cover system (e.g. low permeability overburden zone) and the continuous saturation of the tailings.	The original mine closure plan filed in 2015 and the draft amendment submitted in October 2017 outline that at the end of the operations phase a low permeability overburden cover will be placed on the upstream side of the dam around approximately two thirds of the perimeter. The remaining one third of the length being reclaimed at closure. The cover will be seeded and armoured with nonacid generating rock. The remaining exposed tailings will have a permanent water cover of approximately 2m. Once this work is completed New Gold can focus on meeting the monitoring requirements of this commitment.	
48	The thickness and maintenance of water cover over the TMA will be clarified in the Closure Plan.	The original mine closure plan filed in 2015 and the draft amendment submitted in October 2017 discuss a 2m water cover over the tailings at closure.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
49	A detailed monitoring plan will be developed as part of the Provincial closure planning process to ensure that the deposited tailings solids remain permanently saturated in the post-closure condition. This plan will include consideration of the low permeability overburden perimeter cover bordering the tailings dams to ensure that the deposited tailings beneath the perimeter overburden cover remain saturated, or alternatively that the overburden zone cover itself remains sufficiently saturated so as to prevent oxidation of the underlying tailings. The monitoring program will consist of the following principal elements: • Establishment of a field trial to simulate the performance of the low permeability cover, with initiation during the development phase and monitoring during operations to support the closure design to ensure saturation levels in the cover and underlying tailings to confirm, or modify, design criteria;	The first Closure Plan for the Rainy River Project was filed in 2015. A Closure Plan Amendment (draft) was filed with the Ministry of Northern Development and Mines in October 2017as the project transitioned from its construction phase into operations. It is important to note that the depositing of tailings in the TMA is in its early stages starting in September 2017. Section 6.2.4 of the Closure Plan discusses the progressive reclamation strategy for the TMA that will occur much later in the mine life, as it will be actively used for tailings deposition throughout operations and allowed to flood upon closure. At the end of mine operations the plan is to allow a low permeability overburden cover approx. 150m in width to be placed on the upstream side of the dam around two thirds of the ultimate perimeter allowing the remaining one third to be reclaimed at closure. The purpose of the cover is to prevent the water cover from coming in contact with the dams and it will also limit oxygen diffusion into the uppermost portion of the tailings underneath. The overburden layer will be seeded with native seed mix and armoured with Non Acid Generating (NAG) rock. The remaining tailings will have a permanent water cover of approximately 2m. As the project advances through its operational phase more research and planning will be conducted on the management of tailings at closure. Additional planning will be outlined in future closure plan amendments.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	Survey of the final tailings surface prior to flooding for closure, with results of the survey tied to TMA dam crest elevations and the spillway invert elevation;		
	• Establishment of a water level monitoring station within the tailings pond, near to the spillway, with measurements to be taken at regular intervals;		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
49 Continued	A detailed monitoring plan will be developed as part of the Provincial closure planning process to ensure that the deposited tailings solids remain permanently saturated in the post-closure condition. This plan will include consideration of the low permeability overburden perimeter cover bordering the tailings dams to ensure that the deposited tailings beneath the perimeter overburden cover remain saturated, or alternatively that the overburden zone cover itself remains sufficiently saturated so as to prevent oxidation of the underlying tailings. The monitoring program will consist of the following principal elements:	New Gold is aware of this commitment and will implement in future Closure Plan Amendment when the mine begins to transition from the operational stage to closure.	
	• Establishment of a series of piezometers positioned around the TMA overburden zone perimeter that would measure water levels within both the overburden and the underlying deposited tailings, with such piezometers to be fitted with data loggers that would take continuous water level measurements		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	at approximately daily intervals; • Updating the hydrological data for analyses of the TMA basin at a point approximately two years prior to implementing final closure of the TMA to confirm, or modify, applicable water balance parameters; • Undertaking an updated review of climate change scenarios at a point approximately two years prior to implementing final closure of the TMA to confirm, or modify, anticipated future hydrological conditions related to climate change scenarios; and • Annual reviews of water cover performance.		



Description	Status 2017	Date Completed (where applicable) 2017
In the event that observed water levels within the TMA pond were to decline to a level where there was a risk of the deposited tailings solids becoming partially unsaturated for extended periods, the available contingencies to mitigate that condition would be the following: • Periodically pump water from the Pinewood River during spring freshet, or during other high water periods, to maintain the TMA post closure water cover within an optimal zone (alternatively water could be periodically pumped to the TMA from the upper water column of the flooded open pit – pending suitable water quality);	In the fall of 2017 the Rainy River Project transitioned from a construction to operational state. Currently this condition doesn't apply as the mine and Tailings Management Area (TMA) are not in a closure state. However, New Gold intends to have a 2m water cover over the tailings as discussed in the Mine Closure Plan. A cross section of the tailing closure configuration and schematic taken from the 2017 Draft Closure Plan Amendment can be found in the supporting documentation for Appendix C.	
Raise the spillway invert to further increase the depth of the TMA water cover (this action would require a widening of the spillway to continue to allow for passage of the probable maximum flood); or		
	In the event that observed water levels within the TMA pond were to decline to a level where there was a risk of the deposited tailings solids becoming partially unsaturated for extended periods, the available contingencies to mitigate that condition would be the following: • Periodically pump water from the Pinewood River during spring freshet, or during other high water periods, to maintain the TMA post closure water cover within an optimal zone (alternatively water could be periodically pumped to the TMA from the upper water column of the flooded open pit – pending suitable water quality); • Raise the spillway invert to further increase the depth of the TMA water cover (this action would require a widening of the spillway to continue to allow for passage of the probable	In the event that observed water levels within the TMA pond were to decline to a level where there was a risk of the deposited tailings solids becoming partially unsaturated for extended periods, the available contingencies to mitigate that condition would be the following: Periodically pump water from the Pinewood River during spring freshet, or during other high water periods, to maintain the TMA post closure water cover within an optimal zone (alternatively water could be periodically pumped to the TMA from the upper water column of the flooded open pit – pending suitable water quality); Raise the spillway invert to further increase the depth of the TMA water cover (this action would require a widening of the spillway to continue to allow for passage of the probable



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	spillway invert to further increase the depth of the TMA water cover. In development of the above contingencies, trigger levels would be developed for implementation of the contingencies.		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
51	Mitigation measures that will be used to reduce potential adverse effects to the Pinewood River aquatic system will include the following: • Extensive contact water recycling for process plant needs to reduce overall water demands and to minimize final effluent discharge volumes to the Pinewood River;	Mitigation measures that will be used to reduce potential adverse effects to the Pinewood River aquatic system will include the following: With the commissioning of the Water Management Pond (WMP) on April 25, 2017, the building of the initial water inventory for the project began. Contact water from the open pit, overburden and mine rock stockpiles, and process plant site was pumped to the Mill to assist with the processing of ore, or to the WMP. There were zero discharges from the WMP to the Pinewood River in 2017.	
	 Use of SO2/Air treatment for cyanide destruction and heavy metal precipitation in the process plant followed by extended effluent aging in the TMA pond and in the water management pond to achieve the highest quality effluent reasonably achievable; Use of a constructed wetland 	Authorization to deposit tailings in the Tailings Management Area (TMA) Starter Cell was received September 28, 2017. Prior to deposit in the TMA, process plant effluent passes through an in-plant tailings slurry cyanide destruction (S02/Air) treatment facility. Effluent is aged in the TMA and Water Management Pond (WMP) for an extended period prior to supplemental treatment from the WMP effluent treatment plant and Constructed Wetlands. The WMP effluent treatment plant and Constructed Wetlands are currently in design phase, with a pilot test scheduled for spring 2018 and construction to commence in fall 2018. There were zero discharges to the environment from the WMP and TMA in 2017.	
	system for final effluent polishing of a major portion of the discharge;	The Constructed Wetlands are currently in design phase, with a pilot test scheduled for spring 2018 and construction to commence in fall 2018.	
	Management of the site for ARD control during operations and following closure to prevent adverse water quality impacts to the Pinewood	Management of the site for ARD control during operations and following closure to prevent adverse water quality impacts to the Pinewood River;	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	River;	Commissioning of the Mine Rock Pond in December 2017.	
	 The DFO (DFO) Freshwater Intake End-of-Pipe Guidelines will be followed as mitigation for potential fisheries effects associated with water intakes; Construction of the Pinewood River Highway 600 re-alignment crossing (bridge or culverts) in a manner that does not restrict fish passage; 	The DFO (DFO) Freshwater Intake End-of-Pipe Guidelines were implemented in 2016 during the construction of the Pinewood River Pumphouse. Fish screens were also installed on construction dewatering pumps during the construction of the diversion structures and culvert installations. The construction of the Pinewood River Hwy 600 crossing was completed in 2016 and consisted of the installation of a clear span bridge with no in water work that would restrict fish passage.	
	Maintaining current fish habitat productivity; and	On-going monitoring under the Pinewood Biological Monitoring Plan for direct effects to fish (implemented in 2015).	
	• Implementation of an extensive monitoring plan for water quality and flow discharges, and receiving water aquatic life and habitat.	Monitoring of Pinewood River water quality is conducted monthly as part of the Surface Water monitoring program. The Pinewood Hydrometric Monitoring program outlines monitoring for flow changes. Receiving water aquatic life and habitat monitored under the Pinewood Biological Monitoring Plan for direct effects to fish.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
52	All final discharge points will have a point of control to immediately cease discharge. A control structure will be constructed at the discharge point of the treatment wetland to be in compliance with MMER. All discharge locations will be regularly sampled in accordance with environmental approval requirements and will provide insight as to ongoing treatment system performance.	The operational detailed design for the RRM is consistent with this commitment. There are currently nine temporary discharge points for surface water effluent that report to the Pinewood River, including one that was not constructed and one that is not in use in 2017. The discharges from these temporary discharge points are batch, not constant discharges, and are measured with flow meters. Water quality is sampled during every discharge and assessed against provincial and federal water quality requirements. Construction of the Constructed Wetlands is scheduled for the fall of 2018.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
53	NG acknowledges the need to meet effluent criteria for any discharge to the environment. Excess water discharged to the environment will meet applicable Federal and Provincial guidelines for the protection of aquatic life, or other scientifically defensible alternatives, in the receiver, as well as any site-specific approval requirements.	There were 58 Project construction related effluent discharges in 2017. Effluent was treated with filter media, flocculent and dry ice to reduce total suspended solids and un-ionized ammonia. All effluent met the environmental approval requirements with the exception of: Three daily total suspended solids discharge limit exceedances, including one monthly total suspended solids exceedance One instance of MMER acute toxicity to rainbow trout from mine water from the Open Pit	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
54	Minimize the number of final effluent compliance points as reasonable.	Through 2017, there were nine approved effluent compliance points. Of the nine, one was not constructed, one was not utilized and another 3 were utilized infrequently. None of the discharge points represent a constant discharge. During the transition from construction to operations, it may be necessary for some of the final effluent compliance points to remain active to facilitate discharge of effluent as a contingency plan, as required and as it meets discharge criteria. During the Operational Phase, the current design requires four final effluent discharge points; Sediment Pond 1 Discharge, Sediment Pond 2 Discharge, Water Management Pond Pipeline Discharge and the Constructed Wetland Final Discharge points. In 2017 none of these structures had been constructed.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
55	NG agrees to work with the MOE to develop a mutually acceptable minimum flow threshold, below which water from the Pinewood River would not be taken to build up the initial water inventory to support processing plant start up operations. Subject to approval(s), NG is proposing spring and open water flow thresholds of 10,000 m3/d and 5,000 m3/d, respectively, below which direct water taking from the Pinewood River downstream of McCallum Creek, would temporarily cease until river flows recover. The application of such flow restrictions would be based on day to day prorated flow data obtained from Water Survey of Canada (WSC) Station 05PC023.	Thresholds have been agreed to through the Provincial environmental approvals process, including Permit to Take Water (PTTW) 8776-9W2QN3.	Complete





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
56	The appropriateness of the use of the WSC station will be assessed as part of the operations planning, and if this station appears unsuitable, a separate dedicated flow monitoring station will be set up, either independently, or in association with the WSC.	A dedicated station was established on the Pinewood River on October 9, 2015 in consultation with the MOECC.	Completed October 9, 2015.
57	Optimize the timing and positioning of final effluent discharges to the Pinewood River so as to limit the potential for adverse flow effects to the river.	In 2017, there were nine final effluent discharge locations obtained through the Environmental Canada Metal Mining Effluent notification process. These discharges are included under the Permits to Take Water from the MOECC to regulate the volume of water. Water quality is measured at the discharge for both Federal and Provincial regulation limits.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
58	Subject to approval(s), NG is proposing to operate the final effluent discharge from both the Constructed Wetland and the pipeline discharge from the Water Management Pond, such that a minimum 1:1 receiver to final effluent mixing ratio would be maintained in the Pinewood River, with the understanding that receiver to final effluent mixing ratios of greater than 1:1 would be the norm.	The Provincial ECA 5178-9TUPD9 received from the MOECC is consistent with this commitment. The constructed wetland is scheduled for construction in fall 2018. In 2017 there were no discharges from the Water Management Pond.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
61	NG commits to the discharge of effluents to the Pinewood River in a manner that will achieve rapid mixing within the river. If future operational monitoring shows that effective receiver mixing is not attained, NG commits to implement additional measures to enhance mixing to a level which is mutually acceptable to the MOE and NG. Such additional measures could include the use of rock groynes placed on either side of the channel to force mid-channel mixing, and use of boulder clusters to increase flow turbulence within the mixing zone.	Discharging effluent to the Pinewood River via the pumphouse was not required in 2017. A rock groyne has been discussed with the MNRF and New Gold will be required to obtain appropriate permit approvals (LRIA) prior to installation.	
60	Scheduling of RRM development activities will consider environmental aspects, such as fish spawning.	During the development stage of the Rainy River Project the following activities and mitigation measures were implemented to consider environmental aspects such as fish spawning; - Appropriate permits and approvals were obtained from the government to ensure timelines and conditions were in place - Culverts were installed outside of fish spawning windows as identified by the MNRF through the LRIA permit process	





Condition/	Description	Status 2017	Date Completed
Tracking #			(where applicable)
			2017
		- Air quality monitoring stations were installed and operational during the	
		, , ,	
		construction phase of the project to ensure there was no impact to air quality.	
		- Water and dust suppressants as approved by the MOECC were used to	
		control dust on roads, excavating in the open pit and aggregate extraction to	
		, , , , , , , , , , , , , , , , , , , ,	
		minimize impacts to air quality.	
		- New Gold hired an onsite Sediment Erosion Control expert (2015 to current)	
		to implement erosion control mitigation measures to reduce the impact of	
		sediment from entering water courses within the project boundary	
		sediment from entering water courses within the project boundary	
		- Vegetation buffers were left around creeks and water courses to prevent	
		sediment runoff from construction activities from impacting aquatic life	
		Sealment ranon nom construction activities from impacting aquatic ine	
		- where possible construction activities were scheduled in the winter to lesson	
		impacts on the environment and undergrowth vegetation (ie; the clearing and	
		construction of the transmission corridor, excavation of the Clark Creek	
		Channel)	
		Gilatiliei)	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
61	A No Net Loss Plan and compensation strategy will be developed and implemented by NG to create new like for like habitats as project compensation and/or enhance existing restoration programs, to offset the RRM habitat losses.	 To offset habitat loss New Gold has currently completed the following; Ownership and maintenance of over 1800 ha of overall benefit land to compensate for the loss of boblink and whip-poor-will habitat during construction; Completion of the water diversion structures and ponds to offset for the loss of fish habitat in the former West Creek, Clark Creek and Teeple Drain systems. Monitoring of the Clark and Teeple systems commenced in 2017 and proved to support fish passage. Stockpile and West Creek ponds with associated diversions should allow for suitable fish passage by fall 2018; Reclamation of Tait Quarry will be complete in summer 2018. 	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
62	Except where aquatic habitat will be overprinted (and compensated for as part of DFO authorizations) for project development, a 120 m buffer zone will be maintained adjacent to rivers and creeks to the extent practical, to protect watercourses and their associated vegetated margins.	Buffer zones are maintained by reducing tree clearing, grubbing and equipment access. New Gold regulates this by; providing construction contractors with maps of buffer zones, using flagging tape to flag off 'no entry' areas, limiting the use of equipment around water courses, conducting field inspections of work areas.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
63	Fish flesh and fish organ tissue samples from the Pinewood River have been analyzed for metals for walleye and northern pike in the baseline condition. A commitment has been made to continue to monitoring metals in these two fish species after mine start-up. Should there be future evidence to show that fish are being taken from the Pinewood River on a more regular basis and prepared as a food source, NG would be pleased to work with these fishermen to collect and analyze a reasonable sampling to reflect any applied methods of food preparation.	In 2017, the RRM Fish Tissue Monitoring Program was conducted between September 11 and 19 th in the Pinewood River. All data collected was compared to previous data collected in 2016, 2015 and 2012 (baseline). Samples of the fish muscle tissue, liver and ovaries (when applicable) are removed and sent to a certified laboratory to be analyzed for metal accumulation. Fish were collected using fill nets and hoop nets. It is important to note that the accumulation of mercury in larger predatory fish tissue is common in northwestern Ontario and baselines for human consumption have been set out by the government. The 2017 results indicated limited to no change from previous year's data. The samples reveled two large northern pike and three walleye that had elevated levels of mercury concentrations in fish tissue, however overall results indicated that the metal concentrations were below the human consumption benchmarks for metals. A copy of the 2017 Fish Quality Monitoring Report can be found in Appendix A.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
64	Fish tissue (dorsal muscle tissue and livers) sampling will include both northern pike and walleye. If contaminant concentrations increase over time, potential consumers and the applicable Provincial departments (MOE and MNR; MNR) would be informed and information related to increased health risks (if any) would be provided, as suggested.	To date fish tissue sampling of northern pike and walleye in the Pinewood River has been conducted in the fall of 2012 (baseline), 2015, 2016 and 2017. Sample results have shown that there has been no increase in metal concentrations in fish tissue, liver and ovary samples. The study will continue to be conducted on an annual bases and information shared with appropriate government authorities. Additional information regarding the sample results can be found in commitment number 63. It is important to note that in 2017 the constructed wetlands were not in place as they were not required at this stage of the project. Therefore there has been no effluent discharge from the tailings management area to the Pinewood River.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
65	Specific erosion and sediment control measures and their locations will be provided in the permit application documents once detailed design is completed to avoid direct impacts to fish during the mine construction phase.	Erosion and sediment control measures and their locations have been and continue to be provided in the permit applications for all major infrastructure works that may impact a fish bearing waterbody or channel during mine construction phase. The permit applications, filed under the Lakes and Rivers Improvement Act (LRIA) and Environmental Protection Act, contain a sediment and erosion plan for each works which is incorporated as a condition of the work permit approval under the section entitled "Further Submittals and Approval Conditions".	Complete, ongoing
66	Pond dams will be inspected at a regular interval by site employees for any visible signs of concern and particularly during and after major storm events. They will also be inspected periodically by a qualified geotechnical engineer at an interval that meets regulatory requirements at a minimum.	The mill was commissioned on September 14, 2017. Initial deposition of tailings was to the TMA sub-cell referred to a Cell 1 and the as North and South dams were not complete. Deposition continued through December 31, 2017. Inspection frequencies and standardized inspection record sheets for the water management systems at the Rainy River Mine are outlined in the Operation, Maintenance and Surveillance Manual Version 8 (OMS Manual) which is attached in the Supporting Documentation for Appendix C.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
67	Surface water: to be monitored during construction, operations and active closure phases, with post active closure monitoring expected to continue for a decade (or more) at reduced frequencies pending ongoing analysis of data	Environmental monitoring was ongoing during 2017, consistent with all environmental approvals, environmental commitments and site management practices. Monthly surface water quality summaries are submitted to MOECC as per ECA requirements.	
68	Proposed (subject to modification to ensure participation and data sharing is adequate to meet the expectations of Aboriginal groups) surface water sampling program would include a First Nation training component followed by a rotating schedule whereby a First Nation representative would accompany NG staff on the monthly surface water sampling program. Laboratory results will be received by NG, reviewed and submitted to the identified individuals of each participating First Nation along with a summary explanation.	When the project was operated by Rainy River Resources, there once was a formal water sampling program with all the communities, where staff demonstrated how to take water samples and explained what the sample results meant. In 2017 the Environmental Manager met with the Rainy River Stewardship committee a few times to discuss potential programs, but the Stewardship Committee didn't pursue the option. Since 2015 New Gold has employed an Environmental Monitor from Big Grassy First Nation. This role include environmental site monitoring including water sampling and access to training, mentorship and all data and results. The monitor is responsible to communicate with their community on a regular bases. In the event of a water quality exceedance that doesn't meet the requirements of the Metal Mining Effluent Regulation or the Provincial Water Quality Objectives New Gold does inform Aboriginal Communities via email and through communication at the Environmental Monitoring Board Meetings.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
69	Sampling of sediments will take place to evaluate soil quality parameters prior to undertaking any further closure activities for any contact water ponds and drainage works (including stockpile sediment ponds) where breaching is proposed.	In 2016 a topsoil sampling program was completed which included a chemical analysis of soil to be used for closure and reclamation activities. The report identified best case topsoil harvesting locations and provided information on topsoil in Overall Benefit Lands. In 2017 sediment sampling for reclamation was not completed. As the mine progresses through its operations stage New Gold intends to implement further sampling programs.	
70	NG staff is willing to describe the ongoing water quality program and provide freshet data on request. The water management plan for the RRM provides for the management of all site contact waters in accordance with accepted industry standards including periods of high runoff, and sequences of high precipitation years.	No requests were made in 2017. A summary of water sampling data from monthly surface water sampling and water discharges are provided to the Kenora Ministry of Environment and Climate Change office each month.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
71	There will be no sediment ponds associated with the aggregate pit(s).	There were no sediment ponds associated with the Roen Road Pit or Outcrop 3 during 2017. There is one sediment pond located adjacent to Outcrop 3 that is used to capture runoff from the equipment laydown. During the detailed design stage it was determined that a settling pond may be required to ensure high quality effluent from the Tait Quarry (to allow for ammonia degradation in situ and settling of suspended solids) and Provincial environmental approvals were obtained for this structure. During the operation of the quarry (2015 to 2017) groundwater was not generated and the settling pond was not required. Tait Quarry is now undergoing reclamation with a project completion date of summer 2018.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
72	 Related to the transmission line: Tree stumps, root mats and ground vegetation cover will be left intact to reduce the potential for surface erosion and to help maintain groundcover for plant and wildlife habitat; Vegetation (shrub) screens will be left to the extent practical along the single creek crossing that exists between Beadle and Preachers Lake, near the east end of the alignment, for erosion protection, while ensuring clearance requirements for conductors; No in-water work will be conducted and all poles will be placed above the high water mark; Industry standard sediment interception and erosion control practices will be applied wherever appropriate / needed; 	Clearing of the transmission line right of was initiated during November 2015 with construction completed in April 2016. To ensure that all of the commitments are understood and followed, New Gold RRM conducted routine inspections and attended weekly construction meetings with the contractor. Transmission Line Clearing Completed April 2016	Completed November 2015 to April 2016.
	 Should any erosion of the ground be 		





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	identified at the end of the construction period (or during any intervening inspections), the exposed area would be re-seeded or otherwise stabilized to control erosion until native vegetation takes hold. If the erosion is more severe, other methods such as placement of straw matting or equivalent will be used; • Where required in larger quantities, construction materials will be stored a minimum distance of 200 m from any open (non-frozen) surface water, and from major access points; and • Fuelling and maintenance of vehicles will not occur within 50 m of surface waterbodies.		





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
73	.As a result of the independent First Nation review of the Final Environmental Assessment report, NG committed to a joint water quality monitoring and reporting program with the area First Nations (including Big Grassy River First Nation; BGRFN) as part of the existing monthly water quality monitoring program which is currently carried out by NG. The program will be funded by NG and form an integral part of the overall environmental management program as it relates to First Nations traditional knowledge and assurances of maintaining water quality and by extension, aquatic biota protection. The program will be developed jointly with the First Nations in lead-up to the initiation of mine construction. (Letter to Chiefs from Kyle Stanfield, October 2013).	When the project was operated by Rainy River Resources, there once was a formal water sampling program with all the communities, where staff demonstrated how to take water samples and explained what the sample results meant. In 2017 the Environmental Manager met with the Rainy River Stewardship committee a few times to discuss potential programs, but the Stewardship Committee didn't pursue the option. Since 2015 New Gold has employed an Environmental Monitor from Big Grassy First Nation. The role of the environmental site monitoring includs water sampling and access to training, mentorship and all data and results. The monitor is responsible to communicate with their community on a regular basis. In the event of a water quality exceedance that doesn't meet the requirements of the Metal Mining Effluent Regulation or the Provincial Water Quality Objectives New Gold does inform Aboriginal Communities via email and through communication at the Environmental Monitoring Board Meetings.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
74	NG has committed to provide a program of close coordination with Rainy River First Nations in support of the pre-existing First Nation Watershed Program and water quality protection. Company funding will be provided as part of the fisheries compensation program to further water quality enhancement programs for the Pinewood and similar agriculturally impacted waterways.	When the project was operated by Rainy River Resources, there once was a formal water sampling program with all the communities, where staff demonstrated how to take water samples and explained what the sample results meant. In 2017 the Environmental Manager met with the Rainy River Stewardship committee a few times to discuss potential programs, but the Stewardship Committee didn't pursue the option. Since 2015 New Gold has employed an Environmental Monitor from Big Grassy First Nation. This role include environmental site monitoring including water sampling and access to training, mentorship and all data and results. The monitor is responsible to communicate with their community on a regular bases. In the event of a water quality exceedance that doesn't meet the requirements of the Metal Mining Effluent Regulation or the Provincial Water Quality Objectives New Gold does inform Aboriginal Communities via email and through communication at the Environmental Monitoring Board Meetings. Starting in 2015 each fall New Gold hires an independent consultant who is responsible for conducting a fish tissue sampling program in the Pinewood River downstream of the site. The purpose of the study is to assess metal accumulation in walleye and northern pike tissue which are sport fish traditional consumed by First Nation people in the Rainy River District. New Gold has allowed opportunity for First Nation Community Members to participate in the study as well as the onsite Environmental Monitor from Big Grassy First Nation. Results from this study are communicated through the Environmental Monitoring Board. To date there has been no programs brought forward to New Gold for fisheries compensation in the Pinewood or other impacted	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
		waterways. A copy of the 2017 Fish Tissue Quality Monitoring Report can be found in the Supporting Documentation for Appendix A.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
75	To help limit the exposure of potentially acid generating materials to this base drainage through the former Clark Creek channel zone, a layer of non-potentially acid generating rock will be placed in the former creek channel bed area.	During 2017 all potentially acid generating run-off from active areas of East Mine Rock stockpile and ore stockpiles was collected in seepage collection system before discharge to the environment. Clark Creek continued to channel non-contact water into Pinewood River via remnant Clark Creek channel ditch. Commissioning of the Mine Rock Pond dam was not completed until late December of 2017. Closure of Clark Creek channel is scheduled for early Q1 of 2018 when non-potentially acid generating rock will be used to line the former creek channel bed.	
76	Groundwater: to be monitored during construction, operations and active closure phases, with post active closure monitoring expected to continue for a decade (or more) at reduced frequencies pending ongoing analysis of data.	Groundwater wells were monitored throughout 2017, four times each, if not frozen or dry.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
77	A groundwater level (flow) and quality monitoring program of regular sampling and dipping of dedicated monitoring wells will be implemented to confirm that no area wells are affected by the mine. Furthermore, local well owners will be asked to participate in a well water quality program to monitor water quality in their wells.	Site Groundwater wells were monitored for levels and water quality four times each, when not frozen, in 2017. Data from 2017 was reviewed for trends to quantify effects of dewatering and other RRM activities. The Offsite Groundwater Well Monitoring Program was initiated in 2017. Neighboring property owners were contacted and asked to participate in the voluntary monitoring program. The initial background data was collected for ten local wells.	
80	If water quality or availability in local wells is compromised (by the RRM), NG is obligated to replace the system or offer water treatment systems to rectify issues related to water quality or availability shown to be caused by the mine.	An Off-Site Groundwater Monitoring Plan has been drafted and the gathering of initial background information for the neighboring wells was gathered in 2017. Ten neighboring property owners determined to be in the Zone of Influence (see map in plan) agreed to participate. The Off-site Groundwater Monitoring Plan will continue for the life of mine. New Gold is committed to rectifying issues related to water quality or availability shown to be caused to the mine, and the Off-Site Groundwater Monitoring Plan assists with determining the cause of issues related to water quality or availability in local wells.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
79	If local artesian wells stop flowing (related to the RRM), NG will need to provide and install a pump to replace the artesian flow used by the homeowner.	There were no reported effects on local wells related to the RRM in 2017.	
80	A number of groundwater monitoring wells will be placed around the TMA and east mine rock stockpile and pond areas, as shown in Figure 13-3 of the Final EA Report. This groundwater monitoring network may be amended or expanded through the MOE approvals process. Water levels in these monitoring wells will be measured continuously with data downloaded semi-annually. Groundwater samples will be collected quarterly, as described in Section 13.6 of the Final EA Report.	Installation of additional groundwater monitoring wells (post baseline studies) started in 2015 and completed in 2016 in accordance with Provincial Approval requirements. In 2017, three replacement groundwater monitoring wells were installed adjacent to existing wells that could no longer be sampled. In addition, one new groundwater monitoring well was installed in accordance to Provincial approval requirements. The groundwater monitoring wells were sampled four times in 2017, if not frozen.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
81	Mitigation measures that will be used to reduce potential effects on groundwater include the following: • Returning captured groundwater indirectly to the Pinewood River (after treatment and testing if necessary) during the period of mine operations to minimize potential flow effects to the river, especially during naturally occurring, low flow conditions; • Using in-plant SO2/Air treatment for cyanide destruction and heavy metal precipitation to optimize the quality of groundwater seepage associated with the TMA during operations and following mine closure; • Managing the site for ARD control, both during operations and following closure to prevent adverse water quality impacts to the Pinewood River, including that associated with any groundwater seepage; • Accelerating open pit inflow following mine closure, to the extent	The continued operation and construction of the RRM specific to the water management is consistent with this commitment: Water from dewatering activities is treated, if required, to meet effluent quality regulations and released at licensed discharge locations. The Mill is now in operation and the cyanide destruction unit is in use. ARD is being managed in the PAG dump as committed to. Runoff from the PAG dump during 2017 reported to the Temporary Mine Rock Polishing Ponds, was treated as required, tested to meet effluent regulations and discharged to the environment. Rainy River Mine is still therefore the requirements for optimizing pit inflow at mine closure are not applicable at this time. Both Surface Water and Groundwater Monitoring Plans were implemented in 2015 and continued through 2017.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	practicable, balancing the need for managing water quality and maintaining Pinewood River flows over the interim period until the pit can be completely flooded; and • Implementing a monitoring plan for water levels, water quality and flow discharges, and receiving water aquatic life and habitat maintenance.		
82	Monitoring of key terrestrial systems and Species at Risk (SAR) will occur during the construction and operations phase, with post closure habitat development and utilization by wildlife to continue at reduced frequencies consistent with SAR Permit requirements.	Monitoring of terrestrial systems and SAR during 2017 was compliant with environmental approvals and monitoring plan requirements. During 2015 New Gold RRM implemented a site wide wildlife monitoring program that allows employees and contractors to report any wildlife sightings on the project. Education regarding SAR is provided during site orientation. In the fall of 2016, a White Tailed Deer Tissue monitoring program was implemented to establish a baseline for potential metal and cyanide accumulation in deer tissue. Samples are collected from hunters in the area as well as deer killed in vehicle collisions. The study continued in 2017. A summary of the 2016 study results can be found under commitment number 168. A copy of the 2016 White Tailed Deer Tissue Sampling Report can be found in the Supporting Documentation for Appendix C.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
83	Puffballs: NG and AMEC would be happy to receive photos and/or samples of this species and have AMEC experts identify it. If AMEC experts are unable to identify the species they will consult with staff at the Royal Ontario Museum or the Canadian Museum of Nature.	Samples were submitted to the Royal Ontario Museum and confirmed as common species. This information was provided to the resident as of December 11, 2014. No further samples have been provided or discovered.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
84	Rare plant surveys are proposed to be carried out along portions of the preferred transmission line corridor in late Spring / early Summer, 2014. Prior to transmission line construction, additional data collection will be undertaken for that portion of the proposed transmission line routing (Alternative A) west of Highway 71, where there is a baseline data gap for rare plants surveys. This additional data collection will be undertaken to support transmission line permitting, and would consist of the following activities, spread across a 2 km corridor (1 km on either side the transmission line): transect surveys for vegetation communities including surveys targeting the presence of rare plant species. Results will be made available to MNR once the report is complete and the report will be referred to in the Errata.	Surveys were completed during 2014 and a report issued. The report was referred to in the issued Errata for the EIS / EA Report. September 19, 2014	Completed Summer 2014





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
85	The principal mitigation measures that are proposed to limit short and long term adverse effects to local vegetation communities include: • Minimizing dust production along primary mine rock and overburden transportation routes by implementing dust suppression methods and thereby minimizing the zone of influence. Primary dust suppression methods will include road watering. • Annual monitoring of dust deposition on vegetation adjacent to mine roads; and • Active revegetation and encouragement of natural revegetation / recolonization of disturbed areas as part of progressive reclamation during operation and active reclamation at mine closure.	Principal mitigation measures used to limit adverse effects to local vegetation communities included using water trucks equipped with spray bars to water along primary mine rock and overburden transportation routes and revegetation along disturbed areas as part of progressive reclamation in disturbed areas. A total of 119 hectares of disturbed area has been revegetated and recolonized in construction and operations areas.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
86	 In regards to the transmission line: Additional rare plant and breeding bird surveys to be undertaken in May and June, 2014 to identify any further potential environmental constraints that might require construction modification, such avoidance of disruption to rare plant sites (if present) through site specific habitat protection measures; Undertaking transmission line construction in winter (normally December 1 to March 31) to better protect ground cover in sensitive areas where the protection of wetlands, rare plants and SAR is required, and completion of the remainder of transmission line construction in the late summer and fall, outside of the breeding bird season; Vegetation removal will be reduced to the extent necessary to support construction activities and longer-term 	Studies were completed during 2014 and the detailed design and construction plans are consistent with this commitment. Clearing of the transmission line right of way occurred in late November 2015 and the transmission line clearing was completed in April 2016. Some existing access roads required upgrading by adding road bedding material but no new roads were constructed. No vegetation maintenance along the transmission line was required in 2017.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	interference with conductors and fall of adjacent hazard trees). Minimizing vegetation removal includes retaining existing low vegetation ground cover; • Access to the right of way (ROW) will be provided from existing infrastructure (some of which may need to be upgraded, as reasonable for personnel, material and equipment access), but no new permanent access roads are proposed.		2017
	Generally, where access is poor, the ROW will be accessed along the ROW itself. Construction vehicles will not be allowed to travel through surface waters; and • Mechanical means will be used for periodic vegetation height maintenance along the transmission line, instead of herbicides.		





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
87	Scheduling of RRM development activities will consider environmental aspects. Clearing of forests having a density of at least 10 cavity trees per hectare with a diameter at breast height greater than 25 cm will be limited to outside of the bat roosting season (April 1 to November 15) unless cleared by a bat biologist that has surveyed the trees for bat activity. Timing of the transmission line construction will be planned to avoid the breeding bird and main tourist season, as possible.	During baseline monitoring it was determine by qualified professionals that the forest type to be cleared did not qualify as bat habitat. Each year there is no tree clearing from May 1 to August 15 (breeding bird window). Clearing of the transmission line right of way was initiated in late November 2015 and completed by April 2016.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
88	Wildlife awareness information will be included in regular safety and environmental inductions performed by the mine, along with SAR identification and sensitivities, permit conditions and cultural awareness. Wildlife sighting logs or information boards will be installed to notify workers of local bear, wolf or other large mammal or furbearer observations. Workers and contractors will be made aware of seasonal changes in local mammal behaviour or presence in proximity to the mine. Food wastes generated on site will be managed in a manner that limits the attraction of wildlife, such as Black Bear.	In 2015 New Gold RRM incorporated wildlife awareness, avoidance and SAR information to the site orientation that is still delivered to all employees and contractors. Also during 2015 a no tolerance policy was implemented related to feeding and harassing wildlife onsite. This policy remains in effect. Regular site wide radio announcements remind employees about the importance of following this policy as well as reporting wildlife sightings. During 2017 New Gold RRM continued to promote the onsite wildlife reporting procedure. Documented sightings are recorded in a GIS based mapping program. The program allows visual representation on a site map in real time where sightings have been reported. This information is helpful in answering a number of scientific questions related to wildlife adaptation.	
91	All staff and contractors will be provided with training in animal encounters as part of the site orientation process.	The site orientation program includes information regarding wildlife awareness and wildlife encounters. Wildlife awareness information is also provided on an ongoing basis during field-based inspections of construction areas, in toolbox morning meetings and during morning radio announcements.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
90	Road-killed animals or any other carcasses found onsite will be removed in a timely manner to limit the attraction of wildlife.	The limited number of road-killed animals / carcasses found within the RRM during 2017 were disposed of in an area of the project site with limited to no human interaction or buried. In some scenarios samples may be taken for scientific studies.	
91	A wildlife monitoring program will record the efficacy of these avoidance measures (will evaluate the effectiveness of the methods implemented) and annual reporting to EC and the MNR will provide the information requested by the reviewer. NG will provide opportunities to Aboriginal groups to receive the annual reports.	In May 2016 the Wildlife Monitoring Plan for the RRM was accepted by the MNRF. During 2017 aspects of the program that were be implemented include a white tailed deer tissue sampling program to establish a baseline of accumulated metals and cyanide in organ tissue. This is the second year this study was conducted. The 2016 report was submitted to the MNRF in June 2017. A copy of the report can be found in the Supporting Documentation for Appendix C. The Monitoring Plan has a specific timeline for the life of mine and mine closure.	Wildlife Monitoring Program submissions to MNRF; Version 1 Jan 22/15; Version 2 April 20/15; Version 3 July 9/15; Version 4 3/15 July 30/15; Version 5 Feb/16





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
92	A more detailed wildlife follow-up monitoring plan will be developed through consultation with the MNR and EC. As suggested by the reviewer, additional control sites around the periphery of the mine footprint can be developed and monitored following mine construction and periodically throughout mine operations. A draft plan will be issued to MNR and EC prior to commencement of construction. NG will provide opportunities to Aboriginal groups to participate in the development of the plan.	In February 2016 a final version of the Wildlife Monitoring Program for the project was submitted to MNRF. New Gold RRM started to implement the program during 2016. Wildlife Monitoring Program Submissions to MNRF are as follows; Version 1; January 22, 2015, Version 2; April 20, 2015; Version 3; July 9, 2015, Version 4; July 30, 2015, Version 5; February 3, 2016 (final). The plan was accepted in May 2016	
93	The use of exclusion fencing for reptiles and amphibians will be added as a mitigation measure during construction and operations. The placement of fencing will be decided upon through consultation with the MNR and EC.	In 2017 exclusion fencing was installed along the Tailings Management Area Cell 1 seepage collection ditch. New Gold RRM obtains a scientific research license from MNRF each year which allows for the live trapping and relocation of reptiles and amphibians that may be impacted by activities on site.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
94	In regards to the transmission line: • Construction crews will be advised not to interfere with or harass wildlife. No hunting or fishing by construction crews will be allowed. Disciplinary actions will be taken should either occur; • Contractors will be required to handle food and food wastes in a responsible manner, and to educate workers to ensure no feeding of wildlife; and • Should any nuisance wildlife be encountered which pose a risk to construction crews, the MNR will be contacted for direction.	Construction of the transmission line was initiated in late 2015 and completed in April 2016. All Environmental permits, approvals and commitments related to the transmission line contract were communicated to the contractor during an environmental kick off meeting in November 2015. During the construction of the transmission line New Gold's RRM Environmental department conducted regular inspections of the site to ensure these commitments were being followed. Construction Completed April 2016	Completed April 2016



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
95	The primary mitigation strategies for limiting adverse effects to wildlife will include:	The following mitigation strategies applied to during 2017; Hunting did not occur on site except for required trapping of nuisance beavers.	
	Preventing hunting from occurring on all lands owned by NG (required for the safety of workers; this is	Buffer zones were maintained around fish bearing waterways and where necessary temporary erosion control products were installed.	
	currently ongoing during exploration as well);	New Gold RRM has installed speed limit signs on project roads have implemented a site wide no tolerance policy for speeding which is enforced by radar.	
	 Maintenance to the extent practical of a 120 m buffer zone adjacent to rivers and creeks to protect watercourses and their associated vegetated margins; 	Wildlife crossing signs have been installed at six locations on the project site in an attempt to reduce vehicle collisions with wildlife. These locations were chosen based on the volume of wildlife sightings reported in those areas.	
	Restoration of disturbed habitats at closure, including the development of habitats capable of supporting a diversity of wildlife species, including	Regular bulletins regarding wildlife are emailed, posted and broadcast over the radio on site.	
	ungulates, large predators, furbearers and bats;	Wildlife awareness training is provided to all contractors and employees during site orientation.	
	 Enforcement of speed limits along proposed mine access roads to reduce the potential for collisions with ungulates. Signs warning drivers of the possibility of wildlife encounters 		





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	will be posted in areas of high wildlife activity. A log of collisions will be kept to monitor the effectiveness of the proposed mitigation and additional mitigation measures will be implemented if necessary;		
	• Inclusion of wildlife awareness information into regular safety and environmental inductions performed by the mine. Workers and contractors will be made aware of seasonal changes in local deer or large mammal behaviour or presence in proximity to the mine. Workers and contractors will be made aware of seasonal changes in local mammal behaviour or presence in proximity to the mine;		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
95 Continued	The primary mitigation strategies for limiting adverse effects to wildlife will include: • Treatment of the tailings slurry to levels equal to or less than 1 mg/L weak acid dissociable cyanide before deposition in the TMA (which is well below the 50 mg/L weak acid dissociable cyanide threshold criteria outlined by the International Cyanide Management Code); • Fencing the TMA to prevent access; • Covering the exposed tailings beach at closure with a layer of overburden and flooding the remaining tailings with a layer of water to prevent the tailings from oxidizing over the longer term. This will ensure that the tailings pond waters remain of high quality, such that they will not pose a threat to wildlife. The margins of the tailings pond will develop as wetland habitat; • Minimizing dust production along primary haulage routes by implementing dust suppression methods and thereby minimizing the	Regular effluent sampling has shown WAD cyanide in tailings generally reaches the Tailings Management Area (TMA) at 1 mg/L or below. In the fall of 2017 tailings were deposited into Cell 1 (Starter Cell) of the TMA. Temporary fencing was installed around the perimeter of Cell 1. Permanent fencing of the TMA is scheduled for 2018. Tailings currently remain submerged as much as possible and will be submerged and covered with overburden at closure. The RRM follows a Best Management Plan for dust suppression that was developed an approved by the Ministry of Environment and Climate Change in 2016. Food waste is removed on a frequent schedule and stored only in waste bins with lids until removed.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	RRM zone of influence; and • Disposing of food wastes generated on site in a manner that limit the attraction of wildlife, such as Black Bear and wolves.		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
96	Mitigation measures that will be used to reduce potential adverse effects to amphibians will include the following: • Development of a compact RRM site to reduce overall habitat loss and to limit potential adverse effects related to sound emissions to the extent practical; • Restricting the clearing of terrestrial amphibian breeding habitats to periods outside the amphibian breeding season as directed by the MNR; • Implementation of sound abatement strategies to dampen sound infiltrating habitats surrounding high traffic areas of the mine; • Enforcement of speed limits along proposed mine access roads to reduce the potential adverse effects of increased vehicular traffic associated with the RRM. Signs warning drivers of the possibility of wildlife encounters will be posted in	During the planning state of the project consideration into the size of the project site was taken into consideration and achieved as best possible. During the spring and summer clearing restrictions are in place to protect both amphibians and birds. Noise monitoring is conducted and large equipment in the open pit is maintained to reduce sound emissions. In 2015 New Gold RRM implemented and in 2017 continued site wide speed limits and a no tolerance to speeding policy which remains in effect. Wildlife crossing signs were also installed during 2016 on project roadways known for high concentrations of wildlife. Visual observations made along project roadways did not show and increase in frog mortality.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	areas of high wildlife activity. A log of collisions will be kept to monitor the effectiveness of the proposed mitigation and additional mitigation measures will be implemented if necessary;		
	If frog mortality on roadways is found to be a problem along mine access roads or the re aligned Highway 600, silt fencing may be installed to prevent frogs from crossing the road and may direct them to the nearest culvert(s);		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
96 Continued	Mitigation measures that will be used to reduce potential adverse effects to amphibians will include the following: • Inclusion of wildlife awareness information into regular safety and environmental inductions performed by the mine. Workers and contractors should continually be made aware of seasonal changes in local wildlife behaviour or presence in proximity to the mine;	Wildlife awareness training is provided to all contractors and employees during site orientation. Bulletins and radio announcements regarding wildlife awareness are made throughout the year. The SO2 system is online and operational to treat tailings before they leave the Mill During 2017 no effluent from the Mill process was discharged to the environment Generally abiotic conditions exist within the TMA	
	Treatment of tailings slurry containing cyanide and associated heavy metals from the ore leaching process in the process plant using the SO2/Air process before being discharged to the TMA;	Only one tailings beach was created in 2017 and remained active during that time, therefore it was not possible to cover or completely flood it.	
	Discharge of effluent that will result in protection of aquatic life standards in the Pinewood River so that no adverse water quality effects to amphibians are anticipated;		
	Maintenance of generally abiotic conditions within the TMA to discourage wildlife presence; and		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	Covering the exposed tailings beach at closure with a layer of overburden and flooding the remaining tailings with a layer of water to prevent the tailings from oxidizing over the longer term. This will ensure that the tailings pond waters remain of high quality such that they will not pose a threat to wildlife. Margins of the tailings pond will be developed into wetland habitat.		





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
97	Generally abiotic conditions will be created within the fenced TMA during operations to limit the interest of the pond to waterfowl.	During 2017 a Starter Cell (Cell 1) was created within the TMA and is designed to have capacity to store the first six months of tailings. This Starter Cell first received tailings on September 14th 2017. The area was clear of standing timber and was temporarily fenced. Daily monitoring for waterfowl was conducted in the fall of 2017 and if necessary bird deterrents in the form of loud bangers were deployed. The Environmental Department is currently reviewing bird deterrent strategies for the life of mine. Water quality is considered to be abiotic based on weekly testing results.	
98	Scheduling of RRM development activities will consider environmental aspects, such as fish spawning and bird nesting seasons. Tree and woodland clearing will be restricted to periods outside of the breeding bird season (May 1 to August 15). Clearing or modification of known Trumpeter Swan breeding habitat will be restricted to outside the breeding season (March 15 to August 15).	All scheduling of site activities during 2017 was in full consideration of environmental aspects and no known timing conflicts occurred.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
99	A monitoring plan will be developed for Common Nighthawk and Eastern Whip-poor-will, in partnership with the MNR, EC and interested First Nation Communities including the standardized information suggested well as a mortality trigger that will be decided upon during consultation with the MNR and EC, and in consideration of conditions under the Net Benefit Permit being developed by the MNR.	In accordance with ESA FF-C-001-14 a monitoring plan is under way for EWPW with the goal of implementing a management plan in 2020 with support from MNRF. EWPW and Common Nighthawk are like species and the management plan will benefit both species. First Nation communities are playing a role in the progressive reclamation that will be dictated by the management plan.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
100	Breeding bird surveys are proposed to be carried out along portions of the preferred transmission line corridor in late Spring / early Summer, 2014. Prior to transmission line construction, additional data collection will be undertaken for that portion of the proposed transmission line routing (Alternative A) west of Highway 71, where there is a baseline data gap for breeding bird surveys. This additional data collection will be undertaken to support transmission line permitting, and would consist of point count surveys for breeding birds between late May and early July, spread across a 2 km corridor (1 km on either side the transmission line). Results will be made available to MNR once the report is complete. NG will provide opportunities to Aboriginal groups to receive the survey results.	Completed. September 19, 2014	Completed September 19/14



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
101	The primary mitigation strategies for limiting adverse effects to birds and habitat: • Inclusion of wildlife awareness information into regular safety and environmental inductions performed by the mine. Wildlife sighting logs or information boards will be installed to notify workers of local observations. Workers will be made aware of seasonal changes in local animal behaviour or presence in proximity to the mine; • Minimizing the level of potentially disturbing activities near any known or subsequently discovered active raptor and raven nest sites until the nest is vacated; • Annual monitoring of the Bald Eagle nest in Woodland 122 to determine seasonal eagle activity at the nest site which will guide RRM activities occurring in proximity to the nest.	The following mitigation strategies for limiting adverse effects on birds and habitat were implemented during 2017; Inclusion of wildlife awareness information in site wide health and safety bulletins and employee orientation has been implemented since 2015. Wildlife logs have been placed in lunch rooms and a site wide protocol is in place to report wildlife sightings to the security department via radio communication or online with the GIS wildlife viewer. Bear awareness training was also provided to interested staff in 2017. In 2016 an eagle's nest was discovered in the north west portion of the property in an area of overall benefit land (no construction). This is the second nest that has been documented on site. Both of these nests are also in areas that will not be subject to tree clearing. Annual monitoring of these nest found them both to have been active and at least one juvenile is known to have been produced in association with the nest in the south	
	Annual monitoring of the Bald Eagle nest in Woodland 122 to determine seasonal eagle activity at the nest site which will guide RRM activities		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	be adjusted appropriately to reduce adverse effects to the breeding success of the local pair;		
	Maintenance of a safe distance between RRM activities and the nest as well as maintenance of landscape buffer areas (preferably forested or natural) between the activity and nest trees. To avoid disturbing nesting Bald Eagles, no buffer is necessary around nest sites outside of the breeding season once the juvenile eagles are known to have vacated the defined significant wildlife habitat;		
	Limiting less typical activities in proximity to the nest site during the nest building and breeding season. The local eagle pair appears tolerant of agricultural activities and road grading;		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
101 continued	A The primary mitigation strategies for limiting adverse effects to birds and habitat: • Environmental induction programs and ongoing environmental updates provided to workers will make them aware of Bald Eagle nesting activities prior to the commencement of new or irregular activities in proximity to an active eagle nest (within 500 m), and having them observe proper protocol in order to avoid disturbance during these activities; • Restriction of tree and woodland clearing to periods outside of the breeding bird season which extends between May 1 and August 15; • Protection of suitable breeding habitat as a result of the provision of compensatory habitat for species protected under the Endangered Species Act; • Restoration of disturbed habitats at closure to habitats capable of supporting a diversity of wildlife	Since the start of construction in 2015 New Gold has been implementing a no tree cutting policy during the breeding bird window. The project has also installed speed limit signs on project roads and has implemented a radar system for speeding. In the summer of 2016 wildlife crossing signs were installed at six locations on the project site to help reduce the potential for vehicle collisions with wildlife. Monitoring logs of reported wildlife collisions have been kept although there is room to improve on the reporting strategy as not all small animals (ie; skunks) are reported. By the end of 2017 there were two reported Bald Eagle's nests within the project boundary but not within the infrastructure footprint. By the end of 2017 major earthworks were completed for the rehabilitation for Tait Quarry and updated acoustic modeling has been done in an effort to see what sound abatement could be necessary. The rehabilitation plan for Tait Quarry involves creating suitable whip-poor-will habitat. The site will be fully rehabilitated by Summer 2018.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	species;		
	Implementation of sound abatement strategies;		
	• Enforcement of speed limits along proposed mine access roads to reduce the potential adverse effects of increased vehicular traffic associated with the RRM. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity. A log of collisions will be kept to monitor the effectiveness of the proposed mitigation and additional mitigation measures will be implemented if necessary;		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
101 Continued	The primary mitigation strategies for limiting adverse effects to birds and habitat: • Restrictions to clearing or modification of known Trumpeter Swan breeding habitat to outside the breeding season (March 15 to August 15) to prevent the disturbance of nesting swans or impact the likelihood of cygnet survival; • Disposing of food wastes generated on site in an appropriate manner that limits the attraction of wildlife, including Common Ravens, Turkey Vultures and Bald Eagles; • Timely removal of carcasses of road-killed animals or any other carcasses found onsite to limit the attraction of wildlife, such as Common Ravens and Turkey Vultures; and • Treatment of tailings slurry containing cyanide and associated heavy metals from the ore leaching process in the process plant using the	During the baseline studies for the Rainy River Mine no known Trumpeter Swan breeding habitat was identified in areas where clearing was necessary. To date no new breeding habitat has been identified. A site wide policy has been implemented that no tree clearing occurs during the breeding bird window (April to August). In 2015 New Gold ramped up there waste management program by obtaining bins with lids and in some cases locking mechanisms. A Waste Management employee was also hired on a contract bases to oversee the management of waste onsite. Lids on garbage disposal bins have been effective in deterring birds however there have been some bear encounters. The Environmental Department has been actively working with the MNRF Bear Technician in Fort Frances to find effective methods to reduce black bear encounters. In 2017 some New Gold staff were trained by the MNRF on how to live trap and relocate black bears. Carcasses from wildlife killed on roads is removed and disposed of in approved locations within the project boundary where people do not frequent, or the carcasses are buried.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	SO2/Air process before being discharged to the TMA; and • Creation of generally abiotic conditions within the fenced TMA during operations to limit the interest of the pond to waterfowl.		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
102	 In regards to the transmission line: Additional rare plant and breeding bird surveys to be undertaken in May and June, 2014 to identify any further potential environmental constraints that might require construction modification, such avoidance of disruption to rare plant sites (if present) through site specific habitat protection measures; Tree clearing to take place outside of the breeding bird nesting season, defined as the period from May 1 to July 31; Undertaking transmission line construction in winter (normally December 1 to March 31) to better protect ground cover in sensitive areas where the protection of wetlands, rare plants and SAR is required, and completion of the remainder of transmission line construction in the late summer and fall, outside of the breeding bird season; 	Construction of the transmission line was initiated in late 2015 and completed in April 2016 to ensure no impact to birds and limited impact to understory vegetation. Prior to and during the construction period no sticks nests were identified. A vegetation and breeding bird survey was conducted by qualified biologists during 2014 and no rare plants were identified in the construction area. The separation of conductor wires was reviewed during the design of the hydro line to ensure spacing distance was adequate Completed April 2016	Completed April 2016.



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	 Direct impacts to raptor nesting areas will be avoided. There are currently no stick nests on or near the proposed ROW. Should any stick nests be identified during construction, the area will be avoided until a qualified avian biologist can be contacted for direction; Conductor wire separation distances will be sufficiently far apart to preclude larger avian species, particularly raptors which frequently use hydro pole for perching or nesting, from electrocution by contacting two conductor wires simultaneously; 		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
102 Continued	In regards to the transmission line: Construction crews will be advised not to interfere with or harass wildlife. No hunting or fishing by construction crews will be allowed. Disciplinary actions will be taken should either occur; and Contractors will be required to handle food and food wastes in a responsible manner, and to educate workers to ensure no feeding of wildlife.	During the 2016 construction phase of the transmission line regular meetings were held with the contractor as well as regular site inspections to ensure that all commitments were being met. There were no cases of hunting, fishing or feeding wildlife observed. The survey team that was working on the project did frequently report wildlife sightings of timber wolves to New Gold RRM Completed April 2016	Completed April 2016
103	The site will be rendered suitable for other compatible land uses and functions after the mine has closed and the land has been reclaimed. NG will encourage and, as practical, actively restore the RRM site to productive, naturalized vegetation communities on cessation of mining capable of supporting a diversity of wildlife species. RRM revegetation efforts at closure will include providing suitable habitat for SAR species, most notably whip-poor-will, and other species of interest, if practical.	During 2017 the mine site was under construction and entered its first year of production. At this time this condition does not apply. The Tait Quarry which operated between 2015 and 2017 is currently being reclaimed with a project completion date of Summer 2018. The rehabilitation plan has been designed to create suitable whip-poor-will habitat. This plan was developed in conjunction with discussions with the local MNRF office.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
104	The RRM footprint has been altered through consultation with the MNR in order to further avoid known whippoor-will territories where feasible, including maintenance of forest buffers between RRM components and whip-poor-will nesting and foraging habitat where practical. Provide compensatory whip-poor-will habitat that protects known territories and other identified suitable habitat. Where feasible, manage site lighting fixtures to reduce excess light production near whip-poor-will foraging areas, so as to minimize disturbing these nocturnal birds (with all appropriate health and safety issues considered).	The RRM owns and monitors over 1800 ha of overall benefit land in accordance with the Provincial ESA permit ESA FF-C-001-14 since the start of construction. Site environmental inspections address location and use of light plants as possible while maintaining site safety aspects.	
	production near whip-poor-will foraging areas, so as to minimize disturbing these nocturnal birds (with all appropriate health and safety		





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
105	NG will implement a monitoring plan for Eastern Whip-poor-will populations and nesting in proximity to the proposed mine and transmission line sites, within compensatory habitat areas. Continue funding external research programs in collaboration with the MNR in order to further our understanding of this poorly studied species, as part of a larger overall benefits compensation package required by the Endangered Species Act permit.	A monitoring plan was developed in 2015 and implemented as required during 2017 in accordance with ESA FF-C-001-14. New Gold retains trained biologists to conduct annual monitoring. New Gold RRM intends to fund a study to investigate EWPW forage species in hopes of using that information to inform future management strategies during 2018.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
106	NG will implement a monitoring plan for Bobolink populations and nesting in proximity to the proposed mine site within compensatory habitat areas, and in appropriate control areas - developed through consultation with the MNR. Acquire and protect compensatory open country breeding bird habitat suitable for Bobolink breeding at a ratio of 1:1 for opencountry habitat removed for RRM development.	Over all benefit land has been provided in accordance with the Provincial ESA permit ESA FF-C-001-14 and the monitoring plan therein has followed since 2015. New Gold retains trained biologists to conduct the monitoring on an annual bases.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
107	NG will identify Barn Swallow nesting colonies prior to mine construction. Establish zones where Barn Swallow colonization is desired, tolerated or not wanted. Create artificial nesting structures to encourage recolonization or new colonization by Barn Swallows in areas where farm structures are removed. Implement a monitoring plan for Barn Swallow populations in proximity to the proposed mine and transmission line sites and in appropriate control areas.	Four artificial nesting structures were put in place in April 2015, prior to the 2015 breeding season. During 2017, the artificial structures were monitored however there were no nesting attempts. In 2016, two nesting attempts were made in one structure, but no eggs were ever laid. There were some cases of barn swallows and nests being identified within the mine site. These cases were treated by isolating work areas and stopping work until the eggs had hatched and the birds had abandoned the nest.	
108	Where feasible, RRM lighting fixtures will be directed in such a fashion as to reduce excess production of light to the surrounding environment (for Common Nighthawk and Short-eared Owl).	Site environmental inspections on areas utilizing light plants are performed when light plants are in use. Issues, such as lighting fixtures oriented at improper angles, are documented in InControl, a computer tracking program used to record environmental and safety concerns. Specific actions are assigned to area owners with re-inspection deadlines. Light plant Issues not addressed in a timely manner are shut down and removed from site at the area owner's expense.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
109	Monitoring of key terrestrial systems and SAR: during the construction and operations phase, with post closure habitat development and utilization by wildlife to continue at reduced frequencies consistent with SAR Permit requirements	The SAR permit No. FF-C-001-14 for the project was issued in November 2014 and the following spring SAR monitoring commenced in accordance with the permit. SAR monitoring has occurred annually since 2015 and the MNRF have received three annual monitoring reports. As the project advances opportunities for habitat development post closure will be examined.	2017 Annual SAR Monitoring Report submitted to MNRF January 15, 2018



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
110	Mitigation measures that will be used to reduce potential adverse effects to Eastern Whip-poor-will will include the following: • Provision of compensatory whip-poor-will habitat that protects known territories and other identified suitable habitat; • Restricting the clearing of habitats to periods outside the breeding bird season which occurs from May 1 to August 15; • Implementation of sound abatement strategies to dampen sound infiltrating habitats surrounding high traffic areas of the mine; • Where feasible, management of site lighting fixtures to reduce excess light production near whip-poor-will foraging areas so as to minimize disturbing these nocturnal birds (with all appropriate health and safety issues considered);	These measures have been implemented since 2015 and continued to date.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	Maintenance of forest buffers between RRM components and whip- poor-will nesting and foraging habitat where practical;		
	Management of dust through dust suppression activities (best management practices);		
	Enforcement of speed limits along mine-controlled roads to reduce the potential adverse effects of increased vehicular traffic associated with the RRM. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity. A log of collisions will be kept to monitor the effectiveness of the proposed mitigation and additional mitigation measures will be		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
110 continued	Mitigation measures that will be used to reduce potential adverse effects to Eastern Whip-poor-will will include the following: • Environmental induction of RRM personnel, including SAR identification and sensitivities, and knowledge of Endangered Species Act permit conditions; • Implementation of a monitoring plan for Eastern Whip-poor-will populations and nesting in proximity to the proposed mine and transmission line sites, within compensatory habitat areas and in appropriate control areas; and • Continue funding external research programs in collaboration with the MNR in order to further our understanding of this poorly studied species, as part of a larger overall benefits compensation package required by the Endangered Species Act permit.	These measures were implemented during 2017 New Gold RRM will fund a separate / independent research program as a requirement and in accordance with the ESA permit	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
111	The primary mitigation strategies for limiting adverse effects to Bobolink will include:	Since the start of construction (2015) New Gold RRM has implemented the mitigation strategies listed in this commitment on site.	
	• Restricting the development of open country habitats to periods outside the breeding bird season which occurs from May 1 to July 31;		
	Acquiring and protecting compensatory open country breeding bird habitat suitable for Bobolink breeding at a ratio of 1:1 for open- country habitat removed for RRM development;		
	• Enforcement of speed limits along mine controlled roads to reduce the potential adverse effects of increased vehicular traffic associated with the RRM. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife		
	activity. A log of collisions will be kept to monitor the effectiveness of the proposed mitigation and additional mitigation measures will be implemented if necessary;		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	 Environmental induction of RRM personnel, including SAR identification and sensitivities and knowledge of Endangered Species Act permit conditions; Implementation of sound abatement strategies to dampen sound infiltrating habitats surrounding high traffic areas of the mine; 		
	Restoration of disturbed habitats at mine closure or encouraging development of habitats capable of supporting Bobolink and other open country species; and		
	• Implementation of a monitoring plan for Bobolink populations and nesting in proximity to the proposed mine site within compensatory habitat areas, and in appropriate control areas.		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
112	Mitigation measures that will be used to reduce potential adverse effects to Barn Swallows will include the following: • Identification of Barn Swallow nesting colonies prior to mine construction; • Restricting habitat displacement for mine infrastructure to periods outside the breeding bird season which occurs from May 1 to August 15; • Creation of artificial nesting structures to encourage recolonization or new colonization by Barn Swallows in areas where farm structures are removed; • Restoration of disturbed habitats at closure or encouraging development of habitats capable of providing suitable Barn Swallow foraging habitat; • Sound abatement strategies will be implemented to dampen sound	The RRM began to monitoring barn swallows within the project prior to the construction phase (pre 2015) and implemented four artificial nesting structures in 2015 prior to the breeding season to offset the removal of existing farm structures. Monitoring of the success of the nesting structures has been completed over the past three years. 2016 was the first year that nesting attempts occurred in any of the structures. Structures such as the Mill and conveyors had bird deterrents placed on them in 2017, however Barn swallows did get within the Mill as construction was not finished and one juvenile Barn swallow was found dead. This was reported to MNRF and EC. By the end of 2017 the Mill was sealed from birds as much as possible. Best management practices are used to keep birds from nesting in all undesired areas and when a nest is discovered the area receives an appropriate buffer zone until it is found to be abandoned.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	infiltrating habitats surrounding high traffic areas of the mine; • Establishment of zones where Barn Swallow colonization is desired, tolerated or not wanted. These measures may be necessary to prevent colonization in areas of high human or vehicular activity that would put swallows and swallow breeding success at risk or where order and cleanliness are desired. In this case, discouraging tactics may be implemented to discourage colonization. Conversely, protection may be provided to swallows nesting in other locations where their presence is encouraged and does not cause problems to mine operations;		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
112 Continued	Mitigation measures that will be used to reduce potential adverse effects to Barn Swallows will include the following: • Enforcement of speed limits along mine controlled roads to reduce potential adverse effects of increased vehicular traffic associated with the RRM. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity. A log of collisions will be kept to monitor the effectiveness of the proposed mitigation and additional mitigation measures will be implemented if necessary; and • Implementation of a monitoring plan for Barn Swallow populations in proximity to the proposed mine and transmission line sites and in appropriate control areas.	The RRM began to monitoring barn swallows within the project prior to the construction phase (pre 2015) and implemented four artificial nesting structures in 2015 prior to the breeding season to offset the removal of existing farm structures. Monitoring of the success of the nesting structures has been completed over the past three years. 2016 was the first year that nesting attempts were made in any of the structures. In 2017 there were no nesting attempts. As the project advances toward operations the need to establish zones where barn swallow colonization is desired, tolerated or not wanted will be taken into consideration as well as the need to provide additional nesting structures Ongoing	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
113	Mitigation measures that will be used to reduce potential adverse effects to all species of Special Concern and Provincially rare species will include the following: • Restriction of principal habitat displacement for mine infrastructure to periods outside the breeding bird season which MNR has indicated occurs from May 1 to August 15; • Implementation of sound abatement strategies to dampen sound infiltrating habitats surrounding high traffic areas of the mine; • Where feasible, RRM lighting fixtures will be directed in such a fashion as to reduce excess production of light to the surrounding environment. • Establishment of zones where Black-billed Magpie colonization is desired, tolerated, or not wanted. These measures may be necessary to prevent colonization in areas of	Since the start of construction New Gold RRM has been implementing a no tree clearing policy during the breeding bird season. The project has also implemented sound abatement strategies through planning tree clearing to consist only in areas of mine infrastructure, purchasing new equipment constructed with muffler systems and implementing preventative maintenance programs to ensure all equipment is operating adequately. In 2015 speed limit signs were posted on project roads and security was equipped with radar detection equipment. During the summer of 2016 wildlife crossing signs were installed at six locations to warn drivers of the possibility of wildlife encounters. Currently Black-billed Magpie are found throughout the project site with no colonization in high vehicular activity or areas of concern. Currently there are no mitigation measures necessary.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	high human vehicular activity that could put magpie and magpie breeding success at risk. Discouraging tactics may be implemented to discourage colonization. Conversely, protection may be provided to magpies nesting in other locations where their presence is encouraged and does not cause problems to mine operations. • Enforcement of speed limits along mine controlled roads to reduce the potential for adverse effects of increased vehicular traffic associated with the RRM. Signs warning drivers of the possibility of wildlife		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
113 Continued	Mitigation measures that will be used to reduce potential adverse effects to all species of Special Concern and Provincially rare species will include the following: • Inclusion of wildlife awareness information into regular safety inductions performed by the mine. Workers will be made aware of seasonal changes in wildlife behaviour or presence in proximity to the mine; • Treatment of tailings slurry containing cyanide and associated heavy metals in the process plant using the SO2/Air process before being discharged to the TMA; and • Restoration of disturbed habitats at closure including the development of habitats capable of supporting a diversity of wildlife species, including Species of Special Concern and rare species.	These measures have been implemented since 2015 as part of general orientation. Seasonal changes in wildlife behavior are communicated via bulletins, morning radio transmissions and tool box talks. Tailings have been treated as required since 2017-09-14. Progressive reclamation working towards closure is on-going, at the end of 2017 an approximate 140 ha of mine site is considered reclaimed.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
114	Timing of the transmission line construction will be planned to avoid the breeding bird and main tourist season, as possible.	Clearing and construction of the transmission line right of way was initiated between November 2015 and April 2016 to avoid the breeding bird season and main tourist season.	Completed November 2015 to April 2016.
115	Traditional Knowledge/Traditional Land Use (TK/TLU) data has been widely collected for the RRM, including from the closest communities of BGRFN, Rainy River First Nations and Naicatchewenin First Nation. All TK/TLU sessions were community driven, meaning that the method of data collection was community specific. The majority of the data has been broad and overreaching, which NG will continue to respect as it serves as the basis for Aboriginal Persons unique relationship to the land. TK/TLU collection will continue; information collected will be appropriately considered for construction, operation and closure phases. For example, NG will further investigate the historical travel corridor and incorporate appropriately any new information that may become available. (Letter to	No additional Traditional Knowledge or Traditional Land Use information was provided in 2017.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	Chiefs from Kyle Stanfield, October 2013).		
116	NG will share results of the TK/TLU data sessions in a non-public First Nations forum(s). (Letter to Chiefs from Kyle Stanfield, October 2013).	TK/TLU data is owned by individuals and communities. NG has shared available data as requested within specific communities.	Completed Prior to January 15, 2015 as part of Environmental Assessment Consultation



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
117	NG has an open invitation for First Nations, the MNO and regional stakeholders to participate in all baseline and environmental monitoring programs, including Whippoor-will, where appropriate and to share monitoring results. NG will continue to advise of the opportunity at public forums in order to encourage anyone who's interested to participate. (Letter to Chiefs from Kyle Stanfield, October 2013).	During the completion of baseline studies as part of the Environmental Assessment Permitting Process, New Gold retained the assistance of volunteers from a number of communities to participate in data collection. In 2015 and 2016 community members from Big Grassy participated in fisheries research projects. Since the second year of construction New Gold has also employed a community member from Big Grassy as an Environmental Monitor (full-time) within the Environmental Department. Job duties of this position include; air quality, water quality and wildlife sampling and monitoring, participating in on site reclamation projects and reporting on site findings to their community. In addition New Gold has developed Environmental Monitoring Boards as a method of communicating on site environmental activities and research studies to the public.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
118	Additional information related to Lake Sturgeon and the Rainy River First Nations management program as requested, was added to the Final EA Report. NG has committed to a program of close coordination with Rainy River First Nations in support of the pre-existing First Nation Watershed Program and water quality protection. Company funding will be provided as part of the fisheries compensation program to further water quality enhancement programs for the Pinewood and similar agriculturally-impacted waterways.	In 2017 the RRM Environmental Manager met with the Rainy River Stewardship Committee on a few occasions to discuss potential programs, however the Committee didn't pursue the option. New Gold also requested First Nation participation in the annual Fish Tissue Sampling Program in the Pinewood River (Fall 2017) however aside from the onsite First Nation Environmental Monitor there was no additional participation.	
119	NG will reach out to the Seven Generations Education Institute and/or the MNR to obtain any additional information on baseline health of animals and fish. (Letter to Chiefs from Kyle Stanfield, October 2013).	Completed as of March 3, 2014.	March 3, 2014.



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
120	Aboriginal People will play an active role in the development of the mine Closure Plan, including development of the monitoring and mitigation programs. While the Closure Plan will be completed prior to construction, NG will consult on significant revisions periodically during operations to ensure incorporation of TK and best management practices. (Letter to Chiefs from Kyle Stanfield, October 2013).	The Aboriginal Communities participated in a joint technical review of the Closure Plan and have planned participated in the 2017 Closure Plan Amendment.	Completed August 2014.
121	Monitoring programs targeted at ungulates (moose, deer) will be coordinated with local Aboriginal people. (Letter to Chiefs from Kyle Stanfield, October 2013).	The Deer Tissue Monitoring Program was initiated in the Fall of 2016 and continued during 2017. The intent of the project is to collect tissue samples to monitor for metal and cyanide accumulation. In 2016 Aboriginal Communities were consulted with regarding the program. Additional information related to monitoring programs and results are shared with Aboriginal Communities through Environmental Monitoring Boards. The Monitoring Boards are regular meetings organized by New Gold as an opportunity to provide project updates and environmental monitoring and sampling information. The implementation of the Monitoring Boards commenced in 2016 and became more regularly attended in 2017.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
122	NG would be pleased to assemble a map showing the locations of the closest First Nation community water supply intakes on receipt of the locations/coordinates. (Letter to Chiefs from Kyle Stanfield, October 2013).	Water supply intake locations known were included on map provided by New Gold Rainy River Project (October 1, 2014).	Completed October 1, 2014.
123	While the Draft EA has shown no impacts to Aboriginal or non-Aboriginal people's health, any new information that has a potential to impact health will be provided to Aboriginal people. (Letter to Chiefs from Kyle Stanfield, October 2013). Further, NG has committed to analyse ungulate organ meats voluntarily submitted to them by local hunters, with the results of any such analysis made available to local residents and Aboriginal communities.	No new information was obtained or new impacts predicted during 2017 related to the RRM that could affect the health of Aboriginal people. Results from the 2017 Fish Tissue Monitoring Program indicated that there has been no accumulation of metals in the tissue and organs of northern pike and walleye in the Pinewood River as a result of the project. A copy of the 2017 Fish Tissue Quality Monitoring Report can be found in the Supporting Documentation for Appendix A.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
124	NG will work with Aboriginal groups to ensure employee overall well-being. Programs to highlight the dangers of drug use combined with drug testing will be implemented. (Letter to Chiefs from Kyle Stanfield, October 2013).	A First Nations Aboriginal liaison is onsite and available to meet with employees. New Gold provides employee benefits and employee assistance programs to all staff and their families. RRM also has seasonal public ceremonies, established tobacco offering stations and provides an employee assistance program as part of the benefits provided to all employees.	
125	As a best practice and acting as a responsible neighbour, NG will notify local stakeholders of project activities as appropriate.	New Gold strives to provide site tours for neighbours as well as public newsletters distributed district wide.	Neighbours Tour; Sept 28/17 Public Tour; Aug 31 & Sept 14, 2017 Private Neighbour Tours; July 11, Aug 3, Aug 11, Aug 21/17 Newletters; Apr 3 & Dec 21/17





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
126	NG has and will continue to actively engage the MNR and local outfitters including those that hold the Bear Management Areas that will be affected by the RRM.	During 2017 two members of the New Gold Environmental Department completed the Problem Black Bear Management Course provided by MNRF. New Gold then obtained an Authorization to Trap and Relocate Black Bears. Regular discussions occur with the individual who holds the Bear Management Area in which the mine resides.	
127	NG will calculate the area of forest land that will be removed from the total forest land within BGRFN territory, utilizing public sources and provide this information to the First Nation on delineation of the traditional territory by the BGRFN.	New Gold had extensive discussions with Big Grassy River First Nation (BGRFN) regarding traditional territory. A Participation Agreement was signed in January 2015. New Gold also provided the clearing plan to BGRFN on February 13, 2015.	Completed January 2015





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
128	NG is consulting with First Nations and the Métis Nation of Ontario (MNO) on the Draft Closure Plan provided on March 19, 2014. NG has provided resources to these communities to undertake independent review the Draft document. Results of the independent review process will be used to help the Company develop any further commitments and/or mitigations to reduce potential impacts to Aboriginal and treaty rights. This process is expected to be completed concurrent with the conclusion of the EA process.	Nine First Nations and the MNO confirmed participation in the Draft Closure Plan technical review. The results of these independent technical reviews were submitted to New Gold in September 2014, with detailed responses provided and revisions made to the Closure Plan submitted in 2015 as appropriate based on the comments received. The Closure Plan was accepted as filed by the Ministry of Northern Development and Mines on February 23, 2015, shortly after positive decisions on both the Federal and Provincial EAs.	Completed September 2014. Closure Plan filed February 23, 2015.
129	NG is open to discussing closure objectives in relation to the results of the Traditional Knowledge / Traditional Land Use (TK / TLU) study.	No specific comments received in 2017.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
130	NG is supportive of the further development of mitigation measures in relation to traditional hunting (and plant gathering), which could potentially involve: • Continuing to involve BGRFN members in the development of adaptive management techniques related to closure planning, including the rehabilitation of habitat for wildlife; and • Restoring access to RRM lands following mine closure to the extent that such access is safe / possible.	New Gold has a Participation Agreement with BGRFN that takes this commitment into consideration.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
131	NG has committed to provide members of the BGRFN, Big Island First Nation, Ojibways of Onigaming First Nation, Naotkamegwanning First Nation, Rainy River First Nations, Naicatchewenin First Nation and Métis represented by the MNO Region 1 Consultation Committee, the ability to access certain lands that NG is able to make available for gathering of wild medicines, berries or other vegetation. Access will be coordinated with the Aboriginal communities.	NG remains committed to providing access to all areas of the site that are safe to do so. During construction, access is more limited as there is heavy equipment and construction activities in numerous areas. In 2017, Aboriginal communities accessed a designated ceremonial area on Gallinger Road; access to other areas was allowed when it was safe to do so and with site personnel present.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
132	NG has committed to ensure that Aboriginal communities (including BGRFN, Big Island First Nation, Ojibways of Onigaming First Nation, Naotkamegwanning First Nation, Rainy River First Nations, Naicatchewenin First Nation and Métis represented by the MNO Region 1 Consultation Committee) have the ability to access the site for cultural and ceremonial purposes so that local Aboriginal people can undertake ceremonies at different times of the year to show respect for the land and its spiritual aspects. This will ensure that young people can participate in ceremonies and learn from elders and ceremonialists. Teaching through the generations will therefore be maintained.	New Gold remains committed to the opportunity for ceremony. New Gold hosts two ceremonies each year, one in Spring and one in Fall.	Spring Ceremony - May 9/2017 Fall Ceremony - Oct 3/2017





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
133	A detailed Fire Response Plan will be developed (Final EA Report, Section 8.2). This document will be made available for MNR review prior to construction initiation.	A detailed Fire Response Plan was developed in 2015. In 2016 the plan was reviewed. New Gold employees under the direction of the Health and Safety Department have established an Emergency First Response Team. Members of the team have been trained to use the onsite fire truck and fire suppression equipment.	Completed April 2016



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
145	134. NG will engage with local stakeholders as appropriate to provide notification of project activities and to mitigate potential impacts as	New Gold sent out two newsletters in 2017, hosted public tours, participated in local events and provided presentations.	
	practical.	Newslettters - Apr 3/2017 and Dec 21/2017;	
		Public Tours - Aug 31/2017 and Sept 14/2017;	
		Fort Frances High School Heavy Equipment Class Tour - Apr 25/2017;	
		Local community Economic Development Officer Tour - May 17/2017;	
		Beaver Brae High School Tour - May 18/2017;	
		Mine Centre School Tour - June 1/2017;	
		Retired teachers tour - July 13/2017;	
		Big Island student tour - July 21/2017;	
		MNO AGA Tour - Aug 17/2017;	
		Presentations/Participation:	
		Ontario Works - July 11/2017;	
		Mining Form - Wabigoon Lake - Oct 17/2017;	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
		Career Fair - Onigaming - Dec 1/2017; Rainy River District Municipal Association (RRDMA) Annual General Meeting - Jan 28/2017; Industry Advisory Group Meeting - Feb 1/2017; Men's Breakfast Club - Aug 22/2017; Science Technology Engineering Arts & Mathematics (STEAM) night at Sturgeon Creek School - Mar 30/2017	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
135	Related to the transmission line: Compensation will be provided for merchantable timber value where applicable; Maintain transmission line set back distances of not less than 100 m from area lakes to provide effective visual screening from open waters; Landscape screening to minimize the contrast in landscape character; for example by leaving shrub cover vegetation that will not affect the conductors (i.e., the wire) in the ROW at creek crossings; and Minimizing land use conflicts and concerns by consulting with other users and stakeholders (i.e., Aboriginal peoples, hunters, trappers, outdoor recreationalists) to identify and implement other means of conflict resolution.	NG proactively placed newspaper advertisements to advise recreational users of construction activities along the transmission line during the hunting season in 2015, as well as engaged with the Clearwater Association.	Commitment completed 2015



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
136	NG will implement a hiring policy that encourages employment of local workers, including members of human environment regional study area First Nations and Métis communities. Where feasible, goods and services will be procured from local and regional suppliers as well as suppliers that can further demonstrate Aboriginal employee content. Provide on the job Common Core training to assist local workers to develop mining-specific skills, and implement career training and development opportunities for employees once hired. NG will provide continuous, on the job safety training.	In 2015, NG implemented a Human Resource Strategy that focused on local employment which continued through 2017. As of December 31, 2017, 72% of New Gold employees were from the human environment regional study area. Local and Indigenous content is a consideration in all RFP's issued. Training and development is provided to all operations employees to ensure legislated requirements are met. Since 2015, New Gold RRM maintains the position of a business development officer who is available on staff to support local businesses in providing goods and services to the project.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
137	NG will continue to engage with potentially affected stakeholders as the project develops, including those local and regional businesses which may provide accommodation facilities for the RRM workforce.	NG continues to send out newsletters and engage with local stakeholders including Chambers of Commerce. Using external facilities (such as a local contractor's construction on the accommodation facility), NG and its' contractors continue to engage with local businesses for accommodation as construction activities continue. Newsletters - distributed on Apr 3/2017 and Dec 21/2017 Local community Economic Development Officer Tour - May 17/2017; Rainy River District Municipal Association (RRDMA) Annual General Meeting - Jan 28/2017; Industry Advisory Group Meeting - Feb 1/2017; Men's Breakfast Club - Aug 22/2017	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
138	Fish habitat compensation will be provided onsite related to the Federal Fisheries Act. A portion of this compensation habitat, notably the Clark Creek, Clark Creek pond and Teeple pond, could potentially be provided to licensed bait fishermen	Clark Creek, Clark Creek Pond and Teeple Pond were commissioned in 2016. Monitoring on the success of fish habitat and fish re-introduction in the system was ongoing in 2017. In 2016 New Gold presented an access agreement to two local baitfish harvesters for their consideration. Discussions have been ongoing.	
139	NG respects BGRFN's Aboriginal and Treaty Rights, and is working with the community to develop a collective agreement that will include mutually acceptable means for mitigation of accepted impacts.	NG and BGRFN signed a participation agreement on January 9, 2015.	Commitment completed January 9, 2015.
140	Where NG has control, commercially reasonable efforts will be made to work with Resolute, MNR and local loggers to facilitate the use of merchantable timber by local mills, in recognition of the importance of mills to the local economy.	Since 2015 the project footprint has been cleared under permits and authorizations granted from the MNRF. In 2017 a local logging company was hired to remove merchantable timber to support project development.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
141	NG will make reasonable efforts to accommodate Resolute in providing access through NG lands to Crown lands over which Resolute has an interest provided that the access does not interfere with mine construction or operation; that the access does not put the safety and security of NG or Resolute personnel or property at risk; and subject to the prior execution of any land access agreement(s) which NG deems appropriate.	There were no requests for access during 2017.	
142	As the mine approaches the end of mine life, NG will implement strategies to transition the workforce to buffer the effects of job losses, as well as an Adjustment Committee.	Not applicable during 2017 (Construction Phase and start of Operations Phase).	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
143	The health and safety of workers will be ensured by meeting applicable occupational health and safety legislation standards, as well as utilizing other best management practices for industrial hygiene hazard control as appropriate.	New Gold RRM strives to meet or exceed the health and safety regulatory requirements. New Gold RRM provides and ensures that all workers have the necessary personal protection equipment (PPE) to protect against industrial hygiene exposures. The safety department also ensures that workers receive appropriate training in regards to PPE.	
144	While the Draft EA has shown no impacts to Aboriginal or non-Aboriginal people's health, any new information that has a potential to impact health will be provided to Aboriginal groups. (Letter to Chiefs from Kyle Stanfield, October 2013). NG has committed to analyse ungulate organ meats voluntarily submitted to them by local hunters, with the results of any such analysis made available to local residents and Aboriginal communities.	No new information was obtained or new impacts predicted during 2017 related to the RRM, that could affect the health of Aboriginal or non-Aboriginal people.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
145	NG will work with Aboriginal groups to ensure employee overall well-being. Programs to highlight the dangers of drug use combined with drug testing will be implemented. (Letter to Chiefs from Kyle Stanfield, October 2013).	NG has an employee assistance program available to all employees. RRM employees and contractors are required to commit to be fit for duty (physical, mental and emotional state suitable to work safely). NG continues to commit to work with Aboriginal individuals to ensure there are appropriate cultural considerations, including an Aboriginal liaison on site and locations to conduct ceremonies.	
146	A blasting plan will be developed describing all proposed blasting operations at the RRM site. All personnel who handle explosives will have appropriate training; all other individuals will be restricted from access.	New Gold Rainy River developed blasting plans in 2017 that followed this commitment. All personnel who handle explosives have the appropriate training. A locked fence with signage restricts access to the explosives mixing and storage areas.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
147	Recognizing that safety of workers is paramount, NG will attempt to reduce light pollution as possible.	New Gold ensure night shift inspections are conducted and include laydowns and work areas. Light plants and general lighting is evaluated to ensure worker safety and to minimize associated pollution and impact on wildlife.	
148	The RRM has been designed to meet all applicable fire protection system requirements and codes. Regular fire drills will occur to ensure that all workers are familiar with fire response procedures, as dictated within the environmental management system. All workers and visitors on site will receive an orientation which includes fire reporting and response procedures.	All personnel on site receive a site orientation. The site has acquired a fire truck and an ambulance. An Emergency Response Team has been created and employee members have received training on how to respond to fires and other potential onsite emergencies. In order to prepare for major events were two fire drills and one major spill table top exercise were held in 2017.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
149	Should it be determined in the future that additional fire break is required, appropriate approvals will be obtained from the MNR.	The need for an additional fire break was not identified in 2017.	
150	NG will ensure that safe access to properties is maintained during the construction and operation phases of the project. Once detailed plans are progressed, NG would welcome the opportunity to discuss further.	During the construction phase of the project (2015-2017) New Gold used signage, gates and on site security as a means of ensuring staff, contractors, visitors and public land owners were navigating the mine site and construction work zones appropriately and safely. Additional conversations with adjacent public land owners have remain ongoing when necessary to ensure safety. To date public access has been maintained on the Marr Road via Korpi Road and signs have been installed to direct traffic accordingly. During Q4 of 2017 the Rainy River Project transitioned into an operational state. At that time a gate house was installed at the main entrance to the site and security personal stop all vehicles to ensure the driver and passengers have appropriate identification to be on site. Additional security staff are responsible for patrolling the site.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
151	Any infrastructure, such as hydro services, that require relocation will be completed as expediently as possible, to minimize disruption to local users. It is currently envisioned that the disruption will only occur during the switchover from the existing to the (at that time) newly built line.	During the construction of the mine the two key projects that directly impacted the public were the installation of the hydro line and the realignment/construction of Highway 600. Both of these projects were completed in 2016. New Gold has always been committed to informing the public of the projects potential impacts by providing project updates through public open houses, meetings, advertisements and news letters.	
152	The re-aligned Highway 600 will be constructed by NG to MTO standards so that NG can pursue transfer of the road to the Province after construction.	This approach was taken during 2016. Construction of re-aligned Highway 600 was completed in 2016 and officially turned over to the MTO in 2017	Completed 2017
153	NG has had extensive consultations with the MTO in Thunder Bay related to the RRM highway planning and will continue to discuss issues related to the Highway 600 re-alignment, and associated maintenance and safety issues with MTO, the Township of Chapple, Stratton, the Rainy River Valley Safety Coalition, school bus operators, utility companies and emergency response groups.	In 2016, NG had extensive discussions with the MTO, Township of Morley, Township of Chapple and Hydro One regarding Highway 600. The re-aligned Highway 600 was opened to the public on December 23, 2015. An agreement was signed with the Township of Chapple on March 24, 2016. An agreement was signed with the Township of Morley on Feb 17, 2016. Ownership of the new portion of Highway 600 was turned over to MTO in 2017.	Completed 2017





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
154	A new East Access Road will connect Highway 71 with Roen Road by means of Korpi Road, to provide access for the general public, including to properties on Marr Road and for users of Crown land north of the site.	Construction of the East Access Road (Korpi Road) was completed and opened to the general public in 2016.	Completed 2016
155	NG will schedule the delivery of major equipment at off peak times where practical and ensuring that heavy loads are sized appropriately and transported only on highways that have sufficient load capacities while observing half-load seasonal restrictions.	The majority of large scale equipment for the open pit and mechanical components for the mine were shipped to the site in 2016 and all load transport requirements and restrictions were met. As the mine continues to operate New Gold will continue to hire experienced transportation hauling companies to deliver equipment and products to the site.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
156	Only licensed suppliers and carriers will be selected for the supply and transport of hazardous materials to the RRM site. When suppliers are selected, Rainy River will share supplier handling and transport information with the MNO.	Only licensed suppliers and carriers were selected for the supply and transport of hazardous materials to the RRM. Information was shared with the MNR by the RRM in compliance with this condition during 2016. In 2017 an audit was conducted by MTO with regard to transport of Dangerous and Hazardous Materials. Outcome from the audit included adjustment of travel routes to minimize travel on public roads to site. For external transport, this included direct delivery to site via Korpi Rd instead of reporting to the Warehouse first, thereby removing travel and turn around on Teeple Rd. This also reduced response time for site emergency services if an event was to occur.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
157	Drivers will be required to meet all applicable regulatory training requirements, be trained in spill response procedures for the materials they transport, and carry the appropriate Material Safety Data Sheets.	Drivers of licensed suppliers are required to be trained and carry the licenses, permits, documentation and signage as required. In 2017 an audit was conducted by MTO with regard to transport of Dangerous and Hazardous Materials and additional controls were put in place for Warehouse and Logistics staff which included regulatory training and adjustment of travel routes to minimize travel on public roads between Barron Warehouse and site.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
158	Vehicles transporting materials to site will be required to maintain a supply of basic emergency response equipment, including communication equipment, first aid materials and a fire extinguisher, where appropriate.	All vehicles travelling onsite are required to have a spill kit, first aid kit, fire extinguisher and radio. New Gold has also provided an onsite emergency response trailer containing equipment and supplies for handling hazardous spills to the environment. In 2015 an Emergency Response Team comprised of New Gold employees was established. Since 2015 the Team has obtained training on operating fire suppression, driving the fire truck and using emergency spill containment equipment. In 2017 an audit was conducted by MTO with regard to transport of Dangerous and Hazardous Materials and additional controls were put in place which included adjustment of travel routes to minimize travel on public roads to site. For external transport, this included direct delivery to site via Korpi Rd instead of reporting to the Warehouse first, thereby removing travel and turn around on Teeple Rd. This also reduced response time for site emergency services if an event was to occur.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
159	Notification and/or reporting of any vehicular accidents and spills will follow Provincial (Ministry of the Environment) and other applicable requirements.	During 2017, there were no incidents of vehicular accidents causing spills. Each incident where a vehicle left the road was monitored during the vehicle removal for any spills. During 2017 to prepare for an onsite emergency spill the Safety Department has conducted a table top exercise on a potential spill by a delivery semi-trailer.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
160	With regards to controlling adverse traffic effects during transmission line construction: • Ensuring that NG employees and contractors / subcontractors adhere to posted speed limits and practical speed limits along the ROW; • Contractors and their subcontractors will be required to have properly and seasonally maintained equipment; and • Maintain regular communications with the Township of Chapple, the MTO and Ontario Provincial Police representatives, to monitor and mitigate traffic effects.	Construction of the transmission line was completed between November 2015 and April 2016. There were no traffic impacts or accidents during completion.	Completed April 2016.



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
161	NG will monitor regional housing supply, particularly in the Chapple, Emo, and Fort Frances markets during the planning and construction phase of the RRM and in advance of each wave of new operations employment. Engage in regular discussions with Municipal planning officials in these communities to understand the anticipated evolution of their resale and new-home markets, and the extent to which each community desires growth or does not. NG will continue to work with hoteliers and town officials, to help avoid possible construction employment demands that would negatively affect accommodation capacity needed to support the tourist season.	To alleviate pressures on regional housing supply and hoteliers, during 2017 NG has: 1) contracted a local Aboriginal business to provide a 500+ person accommodation facility for construction workers who are contracted by New Gold. The accommodation facility is located on Atkinson Road in Chapple Township. Atkinson Road is located 1.5km south of the junction of Barwick Road and Highway 600 (or approximately 5 km south of the open pit). The accommodation facility was built by Onikaajigan Construction, a partnership between Rainy River First Nation, Naicatchewenin First Nation and Saulteaux Consulting and Engineering. It is owned and operated by Onikaajigan Construction. New Gold exclusively leases the camp facility for the purpose of housing out of town construction workers. 2) committed to local employment 3) developed an employee incentive program to support new housing development 4) working with local developers to construct new accommodation in the region, including an apartment facility in the Township of Emo 5) with the completion of a number of contracts relating to construction, a number of private rental facilities became available to the general market towards the end of 2017.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
162	Develop suitable policies and initiatives to encourage carpooling amongst employees, with the aim of reducing commuter-related traffic and reducing the individual burden of commuting. NG may explore alternate accommodation strategies to support its employees.	Completed on April 14, 2015. A number of former local residents have come forward to request copies of the reports which NG provided.	Completed April 14, 2015.





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
163	NG will continue to discuss the RRM and potential additional demands that could be placed on the services of regional Municipalities. NG will continue to support government-led initiatives that support social sustainability during all project phases. NG with work with local service agencies to gather information about social issues or service capacity issues so that they may be addressed in a collaborative manner. NG will maintain communications with local and regional service providers to monitor and work collaboratively to address any Project-related changes that may be experienced.	In 2017, New Gold contributed financially to the Rainy River District Social Services Administration Board, the Fort Frances Physician Requirement Committee. To reduce strain on the local medical system New Gold has employed a Nurse Practitioner on site. This service is available to all employees. New Gold has provided a letter of support for the establishment of a licensed daycare in Emo.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
164	Potential health risks associated with the consumption of ungulate organ meats will be mitigated through the voluntary submission of organ meats by local hunters for analysis. Results of any such analysis would be made available to local residents and Aboriginal communities.	In 2016, RRM requested voluntary submission of organ and tissue by local hunters as part of the Deer Tissue Monitoring program. In 2016 New Gold implemented a deer tissue monitoring program to establish baseline data of metal and cyanide accumulation in deer tissue for species found within the project boundary and the Rainy River District. Requests for participation in the study were mailed out to Aboriginal Communities as well as posted in public spaces throughout the District. In 2016 37 tissue and organ samples were obtained from area hunters as well as deer carcasses from motor vehicle accidents. The samples were sent to a certified lab to be analyzed for metal and cyanide accumulation. It is important to note that all of the contaminants which were tested for can be produced by mining operations, but can also occur naturally I the environment and can be introduced by other human activities. Many of the contaminants were considered to be at negligible or low levels within most of the 37 samples tested, although a few had quite high variances with concentrations elevated over the majority of the values. These samples were not taken within the boundary of the RRM. The study continued in 2017 and is planned to run in 2018, 2021, 2024, 2027, 2030, 2033 and 2036 or as requested/needed. A copy of the 2016 White Tailed Deer Tissue Sampling Report can be found in the Supporting Documentation for Appendix C. The 2017 report will be available in the spring of 2018.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
165	NG has committed to undertaking a mitigation program related to cultural heritage landscapes and built heritage resources consisting of an illustrated history of the study area.	An illustrated settlement history of the study area was completed by Dan Morisseau in 2015. The completion date was October 23, 2015.	Completed October 2015.





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
166	Emergency response procedures will be established as part of the environmental management system. After any incident, a review will be conducted to ensure that the required design changes and procedures and appropriate monitoring measures are in place to ensure that incident will not be repeated.	Ongoing training occurred during 2017 for the Emergency Response Team. One field emergency response drill was conducted as a review of the emergency response procedures in 2017. The field drill included a review and follow-up actions as part of the conclusion to ensure better preparedness. Two small fires occurred in 2017 however it was immediately contained and resulted in no emergency action and reported appropriately. One fire occurred at the local dump where our ER Team helped local fire fighters to put out the fire. This was a great learning experience for our team to work with local firefighters.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
167	NG has committed to ensure that First Nations (including Rainy River First Nations, Naicatchewenin First Nation, Big Grassy River First Nation, Big Island First Nation, Naotkamegwanning First Nation, and Ojibways of Onigaming First Nation) and Métis community members have the: • Ability to access the site for cultural and ceremonial purposes, so that local Aboriginal people can undertake ceremonies at different times of the year to show respect for the land and its spiritual aspects.	New Gold RRM is committed to providing access to the site for cultural and ceremony purposes.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
167	All NG staff will undergo cultural awareness training. Temporary contractors will undergo an awareness program as part of the regular induction program when working at the mine (Letter to Chiefs from Kyle Stanfield, October 2013). This will ensure that people that work at the site are aware of indigenous culture and values, and are respectful of the principles and values of the Ojibwe people. This mitigation has been identified as a result of the Draft EA independent First Nation review and agreed to by NG. NG will follow up directly with the BGRFN regarding any additional mitigation and accommodation measures.	All New Gold RRM staff and contractors undergo Cultural Awareness training as part of the site induction. Additionally, New Gold has a Participation Agreement with BGRFN which addresses additional mitigation and accommodation measures.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
168	NG is fully agreeable to work with local Aboriginal peoples on an ongoing basis to monitor metal concentrations in country foods (notably fish muscle and liver tissues, and White-tailed Deer liver tissue; and other wildlife tissues as appropriate. A commitment to work with local Aboriginal groups to sample White-tail Deer liver tissues [and other wildlife tissues as committed to herein] for metals analysis has been made. This analysis could be expanded to include testing for additional metals. NG will work with local Aboriginal hunters to determine the most effective path forward on this topic.	In 2016 New Gold implemented a deer tissue monitoring program to establish baseline data of metal and cyanide accumulation in deer tissue for species found within the project boundary and the Rainy River District. Requests for participation in the study were mailed out to Aboriginal Communities as well as posted in public spaces throughout the District. In 2016 37 tissue and organ samples were obtained from area hunters as well as deer carcasses from motor vehicle accidents. The samples were sent to a certified lab to be analyzed for metal and cyanide accumulation. It is important to note that all of the contaminants which were tested for can be produced by mining operations, but can also occur naturally I the environment and can be introduced by other human activities. Many of the contaminants were considered to be at negligible or low levels within most of the 37 samples tested, although a few had quite high variances with concentrations elevated over the majority of the values. These samples were not taken within the boundary of the RRM. The study continued in 2017 and is planned to run in 2018, 2021, 2024, 2027, 2030, 2033 and 2036 or as requested/needed. A copy of the 2016 White Tailed Deer Tissue Sampling Report can be found in the Supporting Documentation for Appendix C. The 2017 report will be available in the spring of 2018. Results from the 2017 Fish Tissue Monitoring Program indicated that there has been no accumulation of metals in the tissue and organs of northern pike and walleye in the Pinewood River as a result of the project. A copy of the 2017 Fish Tissue Quality Monitoring Report can be found in the Supporting Documentation for Appendix A.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
169	NG will conduct a risk assessment of the potential long-term exposure of fish and wildlife to accumulated metals within the constructed wetland. Such a study will be carried out within one to two years prior to mine closure (or earlier during the project operations phase), and if a meaningful risk is determined to exist the risk will be mitigated as part of overall mine closure by removing and disposing the contaminated sediments to the bottom of the pit lake. This could readily be accomplished by a small dredging operation.	This commitment is currently not applicable to the current stage of the project. The constructed wetland will be built in late 2018.	
170	Unterman McPhail will prepare a complete description of the evaluation process for resources identified of cultural heritage value or interest in a memo format.	The memo was completed September 11, 2013.	Commitment completed September 11, 2013.



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
171	At closure, NG will undertake an evaluation of any remaining cultural heritage resources / structures located on NG property in consultation with a qualified professional, and also incorporating any liability/public safety concerns.	Not applicable to 2017.	
172	A range of conservation approaches will be considered in the recommended Cultural Heritage Assessment Report / Cultural Heritage Documentation Reports for Sites #11 and #13 as suggested by MTCS.	Site #11 was demolished in 2015 as it was deemed to be hazardous as it was not structurally fit. Unique features, such has blacksmith hardware were removed and are currently in storage. As part of the development of the Richardson Trail, NG intends to highlight the settlement history through artifacts such as the hardware. Prior to the demolition, NG had contacted a representative of the Chapple Heritage Committee to ensure there were no other considerations. Site #13 remains in situ. A descendent of the builder has expressed an interest in relocating the structure; NG is open to considering the move of the structure.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
173	NG will provide follow-up documentation related to Cultural Heritage Assessment Report / Cultural Heritage Documentation Reports to the following local museums and archives: • Chapple Museum; • Kay-Nah-Chi-Wah-Nung Historical Centre (Manitou Mounds); • Rainy River District Women's Institute Museum; and • Fort Frances Museum and Cultural Centre.	Completed on April 14, 2015. A number of former local residents have come forward to request copies of the reports which New Gold RRM provided.	Commitment completed April 14, 2015.
174	Monitoring would occur for the following durations: • Archaeology: construction phase • Built heritage: construction phase	New Gold had an onsite Archaeologist throughout the construction phase. No additional Archaeological or built heritage resources were identified in 2017.	Completed 2015 to 2017





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
187	With regards to protection of cultural heritage values during transmission line construction:	No human remains or cultural resources were identified during transmission line clearing in 2015 to 2016; the Transmission Line construction was completed April 2016.	Completed April 2016.
	Should human remains be identified during construction, all work in the vicinity of the discovery will be suspended immediately, and notification will be made to the Ontario Provincial Police, or local police, who will conduct a site investigation and contact the district coroner. Notification must also be made to the Ministry of Tourism, Culture and Sport, and the Registrar of Cemeteries, Ministry of Government Services.		
	• Should cultural heritage resources (archaeological or historical materials or features) be identified during construction or operations, all activity in the vicinity of the find will be suspended and the Ministry of Tourism, Culture and Sport archaeologist be contacted. This condition provides for the potential for deeply buried sites not typically		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	• In addition, NG will continue to engage Aboriginal people (including Rainy River First Nations, Naicatchewenin First Nation, Big Grassy River First Nation, Big Island First Nation, Naotkamegwanning First Nation, Ojibways of Onigaming First Nation and Métis community members) about the transmission line construction and will respond should additional culturally significant areas be identified that could be impacted by the construction.		





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
188	Related to transmission line, construction will be supervised by a qualified archaeologist at identified areas of high archaeological potential. Regular, ongoing discussions with stakeholders, Aboriginal people and local communities will help to monitor any effects to the socio-cultural environment and identify mutually satisfactory ways to mitigate negative or enhance positive effects. A formal complaints procedure will be established to provide stakeholders and Aboriginal peoples a voice during the construction, operation and decommissioning phase of the transmission line project. A response protocol will also be established to ensure that follow up occurs.	Prior to construction activities, NG conducted the required assessments on the transmission and line, which included the field assessment of high potential areas as per the 2011 Standards and Guidelines for consultant archaeologists. NG also employs a qualified archaeologist and in 2015 had consultant archaeologist on site. No cultural resources were identified during construction. Archaeology clearance letter was received on the transmission line on Dec 29, 2014.	Completed December 29, 2014.



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
177	A targeted site investigation will be conducted at the end of mine life to identify soils that may have been affected by hydrocarbons or chemicals in specific areas (e.g. truck refuelling area). Soil materials found to exceed the appropriate clean up criteria for hydrocarbons will be remediated according to government requirements. If there is reason to suspect an area of soil has been affected by chemicals other than hydrocarbons, soil samples will be collected and tested. If the applicable regulatory requirements are exceeded, an appropriate method of disposal will be sought in consultation with the relevant authorities.	This condition will be applied at the time of mine closure and reclamation.	
178	Document and respond to comments, issues or concerns.	An External Feedback and Complaint Protocol was issued in follow up to the Provincial EA approval with a completion date of February 2, 2015, and continues to be implemented in 2017.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
179	NG made 13 significant commitments (Tables 3-4 and 14-2) arising from the independent technical review of the Draft EA Report (Version 1) on behalf of Aboriginal groups which will be fulfilled.	These commitments were all met as described in this registry, or through negotiated agreements (non-public).	
180	BGRFN undertook a second independent review of the Draft EA Report provided to the NG on October 18, 2013. The review concluded that additional work with the community was required and NG has committed to continuing the close engagement with the community in support of the RRM development.	BGFN and NG signed a Participation Agreement on January 9, 2015. In the agreement there is a defined protocol for communication and engagement.	Commitment completed January 9, 2015.





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
181	Environmental monitoring will be conducted in accordance with standard practice and regulatory requirements, including any site-specific environmental approvals.	Since the start of construction New Gold has had environmental personal assigned to environmental monitoring to satisfy regulatory requirements and permit approvals. During 2016 and 2017 several of these monitoring protocols where written into Operational Policies for the Environmental Department. New Gold's Environmental Department also launched a site wide computer program (Intelex) in 2017 which houses all of the permit conditions and compliance conditions for the Rainy River Mine. Employees are assigned to these tasks and are required to enter appropriate data, reports and outcomes to ensure compliance with site-specific conditions and approvals.	
182	Operational procedures to minimize the potential of accidents or malfunctions will be incorporated into the environmental management system. Penalties will be imposed for operational violations.	During 2017, the EMS continued to be developed and ongoing. The EMS system continues to be developed using the ISO 14001 Standards and will include operational procedures with penalties for nonconformance.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
183	Procedures will be regularly reviewed as part of the environmental management system.	The EMS was not fully in place and development was still on going in 2017. As such no monitoring of the EMS was completed in 2017. Both New Gold Corporate and the RRM have some policies and procedures in place and in draft form. Reviews of the implemented New Gold RRM EMS, procedures and policies will be completed once the EMS is finalized.	
184	The emergency response plan included in the environmental management system will address the primary hazardous materials on site including procedures for spill response on the trucking route to the RRM site.	During 2017, the EMS continued to be developed and ongoing to adapt to the new products and risks being added in the operation. The emergency response plan included in the RRM EMS addresses the primary hazardous materials onsite and spill response.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
185	All chemicals used at the site will have a Material Safety Data Sheet, in order to comply with the best practices in the industry for health and safety, and to provide relevant regulatory standards for the safe use of these materials.	The Material Safety Data Sheets are provided to New Gold RRM users and are accessible from the online site wide MSDS registry. Within this system, regular review and updates to the MSDS are a required by the department which each chemical. This aspect is included as part of the RRM Health and Safety WHMIS Program.	
186	Monitoring details will be developed through ongoing stakeholder consultation during the EA process, and through conditions placed on regulatory instruments such as permits, authorizations and approvals, issued by the Federal and Provincial regulatory agencies.	Since the start of construction in 2015 New Gold has been developing environmental monitoring programs to reflect the requirements and conditions set out in project permits and approvals as well as concerns brought forward by the public. Modifications to design and construction delays associated with permits and weather have required that monitoring programs are reviewed annually to ensure they are meeting required specifications. Due to the large volume of conditions and monitoring details New Gold seeks qualified and experienced consultants to handle monitoring requirements when necessary.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
187	A Follow up Monitoring Program (FMP) is provided in Section 13 of the Final EA Report, which subject to modification through the EA review process, will be implemented by NG in the manner and schedule identified, to: • Verify the accuracy of the environmental assessment of a designated project; and • Determine the effectiveness of any mitigation measures.	The Follow Up Monitoring Plan (FMP) for the Rainy River Project/Mine is designed around three central principles of environmental protection; Do no harm culture, respect for Aboriginal culture and values; continuous improvement and compliance with all environmental approvals and authorizations. The FMP applies to all stages of the project and the principles of the plan have been incorporated into the regular routine of how New Gold conducts business. Key components of the FMP have been incorporated into the Environmental Monitoring System (EMS) that New Gold is currently developing. The monitoring components are also tracked through our regulatory requirements and commitments for the project. New Gold tracks compliance with these conditions using a computer program called Intelex, where assigned employees are responsible for tracking performance against these commitments and conditions. The FMP and conformance for 2017 can be found in Appendix D of this report.	
188	Subject to acceptance in writing of the FMP by the Federal and Provincial governments, monitoring results will be provided to the parties involved in the FMP annually during the construction and operation phases of the RRM.	To date New Gold has provided all required monitoring information to appropriate government agencies as required or as requested.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
189	A list of FMP commitments made during the EA process will be maintained by NG, indicating where appropriate:	This registry addresses these conditions.	
	• The nature of the commitment;		
	• To whom, or to what group or agency the commitment was made, if specific;		
	Whether the commitment is related to the EA process alone;		
	Whether the commitment is addressed or linked to a regulatory instrument, such as a regulation or environmental approval;		
	Any applicable timeline if any;		
	The status of the commitment; and		
	Additional actions required to fulfil the commitment		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
190	Environmental aspects and potential impacts of the project will be managed within an environmental management system which integrates environmental performance with overall project management.	The EMS is in development and ongoing. New Gold Corporate and the RRM have some environmental policies and procedures in place. A component of the EMS will manage and track the environmental aspects and impacts. Reviews of the implemented New Gold RRM EMS, procedures and policies will be completed once the EMS is finalized.	
191	Implementation and maintenance of the environmental management system will be driven by the NG commitment to ongoing compliance with the environmental requirements. Worker awareness of this commitment and requirements related to their work will be communicated through formal programs such as project orientation, job training or contractor packages.	During 2017, the EMS continued to be developed and ongoing. The EMS system continues to be developed using the ISO 14001 Standards and will include formal training programs and a focus on ongoing environmental compliance.	
192	Periodic management reviews will completed to consider changing circumstances which could affect the continued suitability and adequacy of the monitoring plans, and to support continual improvement in overall effectiveness.	During 2017, the EMS continued to be developed and ongoing. The EMS system continues to be developed using the ISO 14001 Standards and will include periodic management reviews of the RRM operation and continual improvement.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
193	NG proposes to amend the Closure Plan periodically as more information becomes available and as required by the Ontario Mining Act.	Comprehensive Closure Plan Amendment was submitted to MNDM on 26 Oct 2017. This amendment was necessary as the mine transitioned from construction to operations.	
194	NG is proposing to work with Aboriginal groups including Rainy River First Nations, Naicatchewenin First Nation, Big Grassy River First Nation, Big Island First Nation, Naotkamegwanning First Nation, Ojibways of Onigaming First Nation and Métis community members to provide access to alternative private lands for the purposes of supporting TLU on such lands; and potentially providing compensation or incentives through collaborative agreements between the Aboriginal groups and NG. Access will be coordinated with the Aboriginal groups.	NG has negotiated agreements with Rainy River First Nations (October 10, 2014), Naicatchewenin First Nation (October 10, 2014), Big Grassy First Nation (January 9, 2015) the Metis Nation of Ontario (November 25, 2014), Big Island First Nation (October 31, 2016), Ojibways of Onigaming (May 24, 2017) and Naotkamegwanning First Nation (April 19, 2017).	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
195	NG will communicate with Aboriginal groups including Rainy River First Nations, Naicatchewenin First Nation, Big Grassy River First Nation, Big Island First Nation, Naotkamegwanning First Nation, Ojibways of Onigaming First Nation and Métis community members on traditional teachings and ceremony.	NG hosts two annual ceremonies at site; additionally Aboriginal liaison personnel meet with community members to discuss the project, activities, ceremony, etc. All NG employees undertake a 4 hour Indigenous engagement session as part of onboarding.	Fall Ceremony - October 3, 2017 Spring Ceremony - May 9, 2017
196	NG will review the Big Grassy River First Nation Traditional Knowledge / Traditional Land Use study and discuss accommodations of the cultural heritage sites identified.	This was addressed during Participation Agreement discussions. A Participation Agreement was signed with BGFN on January 9, 2015.	Commitment completed January 9, 2015.





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
197	Related to transmission line construction, environmental monitoring will include (but will not be limited to) inspection of: • ROW to ensure excessive vegetation clearing is not conducted; • Appropriateness of equipment choice and maintenance of equipment to minimize environmental impacts; • Effectiveness of erosion control measures where applicable; • Construction activities and equipment operation, including refueling exercises; • Waste management, including wood waste from clearing and domestic wastes; • Monitoring of remedial actions associated with malfunctions and accidents (if any); and	Work on the transmission line was completed in April 2016. The conditions outlined in this commitment were achieved.	Completed April 2016.
	 Any requirements contained in 		



Condition/	Description	Status 2017	Date Completed
Tracking #			(where applicable 2017
			2017
	environmental approvals and permits		
	required to construct the transmission		
	line.		
	At a minimum, weekly inspections by		
	a qualified person will occur of		
	worksites and related areas, during		
	clearing of the ROW and construction		
	of the transmission line. Contractors		
	will be required to have properly		
	trained personnel to provide guidance		
	to construction teams in the absence		
	of the qualified environmental		
	persons. The results of the		
	inspections will be documented and		
	follow-up actions, if any, delineated.		
	Completion of follow-up actions will		
	be confirmed during subsequent		
	inspections. Inspection frequency will		
	be increased should the need be		
	identified. The duration of post- construction inspections, will depend		
	on the results of the construction		
	inspection. At a minimum, periodic		
	aerial inspection will occur for		
	environmental aspects during		



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
	operation, coincident with other aerial surveys.		





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
198	NG will continue to communicate closely with First Nations and the MNO regarding the Project. (Letter to Chiefs from Kyle Stanfield, October 2013).	NG has several Participation Agreements / Impact Benefit Agreements in place which identify ongoing communication protocols: Rainy River First Nations/Naicatchewenin First Nation - Oct 10, 2014 Big Grassy River First Nation - Jan 9, 2015 Metis Nation of Ontario - Nov 25, 2014 Anishinaabeg of Naongashiing (Big Island) First Nation - October 31, 2017 Ojibways of Ongigaming First Nation - May 24, 2017 Naotkamegwanning First Nation - April 19, 2017 In addition, NG provides regular updates through newsletters, public presentations and individual meetings and emails with community representatives.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
199	NG is committed to working closely with the MNO. NG has provided resources to the MNO to undertake traditional studies as well as technical reviews of both the Draft EA as well as the Draft Closure Plan. NG will continue to support the MNO as part of the EA process and as mine operations begin.	NG has a Participation Agreement with the MNO (November 25, 2014) and continues with regular engagement on the RRM.	
200	NG is committed to working closely with the area First Nations and the MNO. NG has provided resources to Aboriginal Groups to undertake traditional studies as well as technical reviews of both the Draft EA as well as the Draft Closure Plan. NG will continue to support First Nations as part of the EA process and as mine operations begin.	NG actively engages all Indigenous groups about the Rainy River project, through newsletters, face to face meetings, site tours, business opportunities and job postings. Condition 9 of the EA approval is being fulfilled, although the level of engagement is directed by the communities.	





Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
201	NG will commit to clearing of flammable debris within a minimum 30 m buffer area.	In 2016 the MNRF expressed concerns regarding the proximity of slash piles to standing timber as well as the size of piles. New Gold worked with the Ministry to ensure that piles were relocated and either chipped or burnt in a controlled manner. New Gold feels that they have received appropriate guidance from the Ministry to confirm that they are meeting the conditions of this commitment.	
202	NG is committed to continuing to engage potentially affected stakeholders as development and operation of the RRM progresses. Local municipalities will be engaged specifically in regards to contingency and emergency response procedures, prior to construction start. MNR coordination will be undertaken as appropriate.	New Gold has agreements with the Township of Chapple and the Township of Morley. The New Gold Health and Safety team has regular communication with Chapple Emergency Response.	



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
203	NG is committed to further discussions with potentially affected Aboriginal groups with respect to development of a protocol for the preservation of artifacts. Where practical and reasonable, artifacts that require removal will be transferred to a public institution selected through consultation with local First Nations and Métis represented by the MNO Region 1 Consultation Committee, in consultation with the MTCS. A MTCS collection transfer form will be completed by the surrendering licensee and the institution accepting the materials. Collection shall be curated to current standards.	NG will work with local Aboriginal groups on the transfer of artifacts. No artifacts were transferred from the archaeologist during 2017.	
204	NG will develop an accommodation with local trapline holders that meets the needs of both the proponent and the trappers.	New Gold worked with a bait harvester in 2017 to develop an access agreement. This was completed Aug 11, 2017. No other agreements are anticipated.	Completed August 11, 2017.



Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
205	NG will enhance components of the Richardson Trail and mitigate the impacts in collaboration with local landowners.	NG will initiate this commitment during the operations phase of the development, as it will be much safer to access particular areas at that time.	

Supporting Documentation

- Commitment Number 8 2017 Q1 through Q4 Air Quality Monitoring Reports
- Commitment Number 10 Updated Acoustic Assessment Report for Early Operations (January 2018)
- Commitment Number 42 2017 Spill Reports Submitted to MOECC
- Commitment Number 43 & 45 Operation Maintenance and Surveillance Manual for Water Management Structures (August 2017 V8)
- Commitment Number 50 Tailings Management Area Closure Configuration Schematic (October 2017)
- Commitment Number 168 White Tailed Deer 2016 Tissue Sampling Report Version 2 (May 2017)