



APPENDIX D
ENVIRONMENTAL ASSESSMENT
FOLLOW UP



Cailey Anderson

Condition/ Tracking #	Description	Status 2017	Date Completed (where applicable) 2017
13.1.1	<p>RRR expects that it will be responsible to carry out the FMP (Follow Up Monitoring Plan); and further, that the involved Federal and Provincial agencies and authorities will have a review and monitoring role regarding the implementation of the FMP by RRR and will require RRR to take corrective action for non-compliance as appropriate. Local Aboriginal groups are considered by RRM to be involved parties for the purposes of the FMP, and accordingly, local First Nations and Métis will be provided the results of the FMP.</p>	<p>Highlights of the Follow Up Monitoring Plan submitted in Section 13 of the Provincial Environmental Assessment for the Rainy River Project have been included in this Compliance Report. The Follow Up Monitoring Plan was originally provided with New Gold's Environmental Assessment to the MOECC for review and input by government agencies.</p> <p>Since the commencement of construction New Gold has been transparent on the involvement of government agencies and Aboriginal groups in the implementation of their monitoring programs and results.</p> <p>New Gold has developed Environmental Monitoring Boards which are meetings with local Aboriginal Groups to discuss ongoing environmental monitoring, research programs and results. Popular topics of discussion include; water quality, wildlife and air quality.</p> <p>New Gold has held regular onsite tours for government agencies, Community members and employee's families to discuss mining operations, ore process and environmental monitoring.</p> <p>New Gold involved the MNRF on the creation and implementation of the Rainy River Projects Terrestrial Monitoring Plan</p>	Ongoing

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		<p>(Finalized in 2016)</p> <p>The Environmental Department provides the MOECC with monthly updates on water quality sampling and project updates related to water taking, construction and water quality.</p> <p>Additional reports associated with the monitoring programs outlined in the Follow Up Monitoring Plan have been shared with the appropriate government agencies (ie; Fish Tissue Sampling (DFO), Air Quality Monitoring and Acoustic Monitoring (MOECC).</p>	
13.2.2	<p>For fugitive dust from roads, stockpiles and open pit operations, RRM will assess the effectiveness of planned dust control measures both visually by plume assessment, and using dust fall jars and high-volume samplers for total particulate and PM2.5. Dust fall samples will be collected monthly during the non-winter period for the construction, operation and active reclamation project phases. Select filter samples will be assessed for metals (full metal scan and including mercury, arsenic, cadmium and lead). Two monitoring stations will be set up at the approximate property boundary locations shown in Figure 13-1 subject to power availability and location specific constraints. Equipment siting, operations, auditing and reporting will following all appropriate MOE requirements as provided in the Operations Manual for Air Quality Monitoring in Ontario (MOE 2008).</p>	<p>An air quality monitoring program was established during Q2 2015. Two air quality sampling stations were installed in May 2015: one to the east of the site on Gallinger Road and one to the south of the site near the beginning of the Highway 600 reroute on Tait Road.</p> <p>These stations are equipped with hi-vol samplers (brush motor and mass flow controlled), PQ200 samplers, dustfall samplers, and passive sampling for SO2 and NO2.</p> <p>The hi-vol samplers measure Total Suspended Particulate (TSP) and metal concentrations averaged over a 24-hour</p>	Ongoing

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		<p>period. The metals and metalloids analyzed include arsenic (As), cadmium (Cd), chromium (Cr), cobalt (Co), copper (Cu), iron (Fe), lead (Pb), manganese (Mn), nickel (Ni), selenium (Se), vanadium (V), and zinc (Zn).</p> <p>The PQ200 samplers measure Particulate Matter 2.5 (PM2.5) concentrations averaged over a 24-hour period. The dustfall samplers measure total dustfall deposition over a 30-day period. Passive sampling measures SO₂ and NO₂ concentrations over a 30-day period.</p> <p>There was one exceedance of the dustfall MOECC AAQC measured in Q2 2017 in April at the Gallinger station; the laboratory noted some particulate, flies and black particles in the jar upon reception.</p> <p>There was also another exceedance of the dustfall MOECC AAQC measured in Q4 2017 in October at the Gallinger Station. An ash analysis was performed on it and determined it had 96% - 98% organics (bird droppings, insects, and pollen). This was determined to no be an exceedance.</p>	
13.3.2	<p>Subject to consultation and support from area residents and the regulatory agencies, RRR plans to measure sound levels at (or near) residences positioned around the RRM site (Figure 13-1). These would include:</p> <ul style="list-style-type: none"> • One residence to the south of the mine site in Black Hawk; 	<p>Sound was measured at the listed locations (residences) and as related to ESA permit requirements. Additional acoustics monitoring was also done to update the projects sound model in 2017, no project</p>	Ongoing

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	<ul style="list-style-type: none"> • One residence to the east of the mine site on Gallinger Road; • One residence to the southeast of the mine site on south Gallinger Road; • One residence to the west of the mine site in Dearlock; and • One residence to the northwest of the mine site on Highway 600. <p>A dedicated remote monitoring system may be used to provide a real time access system. All sound monitors will conform to MOE NPC-103 measurement protocols. As per MOE protocols, sound level measurements are to be taken at each measurement location. Hourly Leq, L10, L90 and Lmax will be recorded. Audio samples based on trigger levels will also be recorded. Trigger levels, with automated alerts will be developed for addressing exceedances.</p>	<p>related noise exceedances were recorded in 2017.</p> <p>A dedicated remote monitoring system was not established during 2017.</p>	
13.4.2	<p>In addition, RRR will carry out the following geochemical monitoring program:</p> <ul style="list-style-type: none"> • As part of the ongoing mine rock management plan, collect and analyze blast hole drill cuttings for analysis of total inorganic carbon and total sulphur, using a Leco furnace, as a means of segregating PAG and NPAG materials for optimal management of PAG mine rock; • Submit a subset of Leco furnace samples, collected as part of the ongoing mine rock management plan, for acid base accounting static testing and metals analysis; • Collect and analyze mill composite tailings samples, on an approximate monthly basis, for acid base accounting static 	<p>A Geochemical Monitoring Plan for the Construction and Operation Phases was issued in accordance with MOECC ECA 5178-9TUPD9 requirements, and was implemented in 2016.</p> <p>Monitoring continued through 2017 and included; analyzing blast hole drill cuttings using a Leco furnace and submission of a subset for ABA and metals analysis, per the commitment.</p>	Ongoing

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	<p>testing and metals analysis; and</p> <ul style="list-style-type: none"> • Conduct additional geochemical testing on an as required basis to provide further information on Project specific aspects, such as any conditions of note evolving out of developing trend analyses. 		
13.5.2	<p>Collect and analyze samples, and measure rates of flow, as appropriate, from site discharges, and runoff and seepage collection facilities, at the start of their respective operations, including:</p> <ul style="list-style-type: none"> • TMA discharges to the Pinewood River both directly by pipeline discharge and through the constructed wetland; • Sedimentation Pond #1 and #2 discharges to West Creek; • Aggregate operation(s), discharges (if any); • Sewage effluent discharge; and • Runoff and seepage collected from site operations areas (TMA, overburden and mine rock stockpiles, plant site area and haul roads) in accordance with MMER and Environmental Compliance Approval requirements. 	<p>A monitoring program was put in place during 2015 and continues to be in place. During 2017 surface water was monitored on and off site as per the monitoring program. Discharges met the environmental requirements, with the exception of:</p> <ul style="list-style-type: none"> - Three instances of elevated total suspended solids and one monthly exceedance concentration, - One instance of MMER acute toxicity exceedance of rainbow trout where a causation analysis was completed and determined inconclusive. 	ongoing
13.5.2 B	<p>For each of the above, where there is a discharge to a receiver (West Creek or Pinewood River) monitor on a monthly basis (commencing at least three months before the first anticipated discharge / release) the quality of waters upstream and downstream of discharge and runoff / seepage releases at proposed monitoring locations shown in Figure 13-2, inclusive of three stations on West Creek and five stations on the</p>	<p>The receiver monitoring was conducted on a monthly and quarterly basis as per the commitment. All samples collected from the receivers met the environmental approval requirements. In July 2017, total and methyl mercury samples were collected during the</p>	Ongoing

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	<p>Pinewood River (including Pinewood River baseline monitoring stations SW10, SW3 and SW15. The two current baseline monitoring stations on the Rainy River (SW16 and SW17) would also be maintained for monthly monitoring. Quarterly samples from selected water quality sampling stations will be collected for trace analysis of total and methyl mercury in discussion with the MOE.</p>	<p>open water period in the Pinewood River upstream and downstream of the site.</p>	
13.5.2 C.	<p>Monitor flows as shown in Figure 13-2 commencing as soon as construction is completed on the West Creek pond and the West Creek diversion at:</p> <ul style="list-style-type: none"> • West Creek at the West Creek pond outflow; • West Creek diversion; and • Pinewood River at Highway 617 (Water Survey of Canada Station; WSC 05PC023). <p>Flows are already being measured for the Pinewood River at WSC Station 05PC023. Note that given the importance of the WSC station to overall site water management as per Section 4.12, RRR will need to enter into an agreement with WSC to ensure that the station will be maintained throughout the RRM mine life, and that data will be made available to RRR on a daily basis, and that RRR would be immediately informed of any maintenance activities which could influence its operations.</p>	<p>Construction of the West Creek Diversion was completed in 2017, however dry conditions that persisted through the summer and fall were not conducive to installation of water level transducers in the absence of water flow. Water level transducers will be installed in 2018.</p> <p>The WSC 05PC023 hydrometric station remains active, however New Gold installed a dedicated hydrometric station on the Pinewood River in late 2015 to supplement this data source, and continued to monitor the station through 2017.</p>	Ongoing
13.5.2 D.	<p>As data availability permits, develop annual updated statistical flow estimates for local watercourses based on flow data derived through monitoring, with such estimates to include:</p> <ul style="list-style-type: none"> • Monthly averages; • Annual averages; 	<p>In-stream measurements were on going during 2017 in the Pinewood River. Updated statistical flow estimates were not derived during 2017 as in-stream measurements were only done in the Pinewood River.</p>	Ongoing

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	<ul style="list-style-type: none"> • Extreme low flow statistics corresponding to 2, 5, 10 and 20 year return period conditions; and • Extreme high flow statistics corresponding to 2, 5, 10 and 20 year return period conditions. 	In-stream flow monitoring in other watercourses is planned for 2018.	
13.5.2 E.	<p>Carry out an environmental effects monitoring (EEM) program in accordance with the Metal Mining Guidance Document for Aquatic Environmental Effects Monitoring (EC 2012d) to assess the character and quality of aquatic resources at the following locations:</p> <ul style="list-style-type: none"> • West Creek diversion; and • Pinewood River upstream and downstream of the RRM site area. 	EEM monitoring took place in 2017 and a characterization for West Creek Diversion and Pinewood River will be available in early 2018	Ongoing
13.5.2 F.	<p>Except as provided for in Item E, above, carry out commencing one year after the date of commercial production and at three year intervals thereafter, fish habitat and fisheries assessments, including sediment and benthos investigations for:</p> <ul style="list-style-type: none"> • West Creek; • Clark Creek (upstream of the east mine rock stockpile); and • Pinewood River. <p>Monitor contaminants of potential concern in fish tissues from game fish harvested from the Pinewood River coincident with monitoring carried out pursuant to Item F, above.</p>	<p>Commercial production was reached in October of 2017 therefore this monitoring program will begin in 2018.</p> <p>Fish tissue monitoring (liver, ovary and muscle tissue) of walleye and northern pike in the Pinewood River commenced in the fall of 2015 and continued in 2016 and 2017. Results from these studies are compared to baseline data collected in 2012.</p> <p>The 2017 study concluded that the effluent from the mine has had no detectable mercury concentrations, suggesting that effluent may not meaningfully contribute to mercury accumulation in Pinewood River fish. There were however 2 pike and 3</p>	Ongoing

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		<p>walleye muscle tissue samples and 1 liver tissue samples from pike with elevated mercury concentrations. This was associated with the large size of the fish. Mercury concentrations in tissue of large predatory fish are often naturally high in northern environments and these results do not indicate the project has influence the fish tissue quality.</p> <p>Furthermore selenium and mercury concentrations in fish tissue were below the provinces established benchmarks for human consumption.</p>	
13.5.2 H	<p>As a component of the RRM stormwater management plan, collect and analyze late winter snow pack samples for pH and metals to help determine the effects of dustfall accumulated within the snow pack during spring melt.</p>	<p>Winter snow was measured as part of the surface water monitoring program with runoff being collected, sampled and tested prior to release to environment in 2017.</p> <p>Passive dustfall monitoring was also active during 2017.</p> <p>The crusher on the plant site was not active until late summer/fall of 2017.</p> <p>Snow pack samples will be taken in 2018.</p>	Ongoing
13.6.2	<p>RRR will carry out groundwater system monitoring as per the following:</p>	<p>A site wide groundwater monitoring system was established including the following aspects:</p>	Ongoing

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	<p>A. Collect and analyze samples, and measure pumping rates for minewater from the open pit and underground transferred to the mine rock pond (or to the TMA during construction);</p> <p>B. Establish a groundwater well (piezometer) network around the open pit area to monitor groundwater levels throughout the area on a continuous basis using water level transducers, with transducer downloads to be completed twice per year, commencing at least six months prior to the start of pumping, all as shown in Figure 13-3;</p> <p>C. Collect groundwater samples from the groundwater well / piezometer network quarterly except where prevented by freezing conditions, and analyze the samples for applicable parameters as provided for in Provincial approvals; and</p> <p>D. Review groundwater monitoring data annually and update the groundwater model on three year intervals, with the first such update to be based on data obtained from the first three full years of pumping; and with the model updates to be completed within nine months of the end of the data collection period.</p>	<p>A) Samples are collected and analyzed and pump rates are measured from mine water pumped from the open pit and transferred to the treatment sumps.</p> <p>B) A groundwater well program was established in late 2015 and early 2016 that extended around the entire site. The piezometers / wells included water level transducers with downloads completed. Mine dewatering wells were established around the periphery of the open pit in 2017 for which water level measurements were also completed.</p> <p>C) Groundwater well samples were taken from the piezometer / well network quarterly during 2017 however during the fourth quarter due to freezing conditions some wells were not able to be sampled.</p> <p>D) The groundwater samples were analyzed for the parameters in the Provincial approvals and the data was reviewed during 2017. The groundwater model was not scheduled to be updated in 2017. The first scheduled update of the groundwater model is to be completed by February 28, 2018, based on the data collected in 2015, 2016 and 2017.</p>	

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13.7.1	<p>A wildlife monitoring plan will be implemented to ensure that effects on wildlife are properly mitigated. FMP monitoring will be based where possible, on standard survey protocols used during baseline studies so that any changes in local mammal, area-sensitive breeding bird or amphibian populations may be detected.</p>	<p>The comprehensive Wildlife Monitoring Plan was issued May 25, 2016 (Version 5) and followed during 2017.</p>	<p>May 25, 2016</p>
13.7.2	<p>Methods for determining adverse RRM-induced effects on mammals following the implementation of proposed mitigation measures will include:</p> <ul style="list-style-type: none"> • Bat acoustic monitoring at representative locations; • Aerial helicopter survey in late winter to document numbers and distributions of White-tailed Deer, Moose and Wolves at locations representing suitable habitat directly adjacent to the RRM site; and control sites. Such surveys to be conducted during the first winter of the construction phase, the winter following the completion of construction, and at three year intervals thereafter until the end of the active mine reclamation phase; • Working with any Aboriginal hunters to document White-tailed Deer, Moose, Wolf and Black Bear harvesting activities in the RRM site area; • Implementation of a wildlife log (including collisions) of general mammal observations made by employees on the RRM site including White-tailed Deer, Moose, Black Bear and any other larger furbearers; and • Monitoring of Black Bear activity related to waste disposal (if applicable) and general site activities. 	<p>In 2017 MNRF has requested that the aerial helicopter study be aligned with their regional monitoring. Due to limited snow pack in 2017, aerial surveys did not take place. The MNRF aerial surveys are to take place in January and/or February 2018 and will cover the District with transect lines spread out much wider than just the RRM.</p> <p>Bat acoustic monitoring was not completed during 2017. During baseline monitoring prior to the commencement of construction it was concluded that no suitable bat habitat existed within the area of tree clearing for project development.</p> <p>New Gold RRM implemented a wildlife log at the site during 2015, and continued documenting wildlife sightings and interactions through 2017. In 2016 the Environmental Department started tracking sightings in a GIS database.</p> <p>The wildlife logs for 2017 include documented Black Bear activity. Some of the sightings were related to bears being attracted to waste disposal bins. New Gold has been sending staff to receive training</p>	<p>Ongoing</p>

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		from the Ministry of Natural Resources and Forestry on how to live trap and relocate nuisance Black Bears.	
13.7.3	<p>Methods for determining adverse effects to breeding birds following the implementation of proposed mitigation measures will include:</p> <ul style="list-style-type: none"> • Targeted point count surveys for diurnal SAR including Golden-winged Warbler, Barn Swallow and Bobolink and for woodland area-sensitive breeding birds in suitable habitat. Point counts will be based on standardized survey protocols described for the Ontario Breeding Bird Atlas Guide for Participants (OBBA 2001) so as to be consistent with baselines study methodology (Section 5.2.12); • Incidental data collection for SAR and Provincially rare species which are currently present at lower abundance including: Canada Warbler, Olive-sided Flycatcher, Short-eared Owl, American Pelican, Bald Eagle and Black-billed Magpie; • Targeted twilight surveys for Eastern Whip-poor-will in suitable habitat. Whip-poor-will monitoring efforts will follow standardized survey protocols as outlined in the whip-poor-will Roadside Survey Participant's Guide (BSC 2012); • Concurrent data collection for Common Nighthawk to be undertaken during targeted Eastern Whip-poor-will surveys as described above as no standardized survey protocols have been developed specifically for this species; 	<p>On an annual bases New Gold retains the expertise of a consulting firm to conduct bird surveys which fill the requirements of this condition.</p> <p>To support the monitoring of bird species onsite the Environmental Department implemented a site wide protocol for reporting wildlife in 2015. Through this system the following bird sightings were reported in 2017; 2 bobolink, 107 barn swallow, 17 eagle, 188 pelicans and 31 swans. Education and awareness of the reporting procedure and onsite Species at Risk is conducted through new employee/contractor orientation, site wide radio communication and publications.</p> <p>Monitoring on the 1 known eagles nest near the project boundary is monitored each year through visual observation.</p> <p>In 2015 prior to the breeding bird window New Gold staff installed four barn swallow nesting boxes in open fields (ESA lands) to offset the loss of habitat on the mine site caused by the removal of old buildings.</p>	Ongoing

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	<ul style="list-style-type: none"> • Annual monitoring of active Bald Eagle nests which occur in close proximity the RRM site. Monitoring will attempt to establish fledging success; • Implementation of a wildlife log of general breeding bird observations at the RRM site by employees (focused on raptors and raptor nests, and SAR species); and • Any additional monitoring defined in ESA permits. 	<p>Each year these boxes are monitored through the breeding bird window for use. In 2017 there was no activity at any of the four locations.</p>	
13.8.2	<p>This section considers the potential for traffic accidents on public roads related to the construction and operation of the RRM. Roads of specific interest are:</p> <ul style="list-style-type: none"> • Highways 71 and 11, west of Fort Frances and south of Kenora; • Highway 600; • Teeple Road west of Highway 71; and • East Access Road. <p>Methods for assessing traffic accidents along public roads will include:</p> <ul style="list-style-type: none"> • Monitoring road surface conditions for the identified roads of interest during the winter months and working with the MTO 	<p>New Gold employees and on site contractors are required to report all near misses and traffic accidents immediately to the New Gold safety department. A record documenting system is in place. In some instances drug and alcohol testing may be required and can be conducted on site by trained staff.</p> <p>New Gold has a zero tolerance policy in place for any employees or contractors caught driving while using a cell phone. There are also policies in place to control speeding on site.</p> <p>Security conduct road inspections on site each night shift. These inspections include Teeple Road, East Access Road and Highway 600. If hazards are identified on</p>	Ongoing

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	<p>(MTO) and the local municipalities, to ensure that roads are properly cleared, salted and sanded, as appropriate to maintain safe driving conditions;</p> <ul style="list-style-type: none"> • Maintaining a record of any accidents involving RRR employees and contractors related to the RRM; and • Maintaining a record of any near misses related to potential traffic accidents along the roads of interest involving RRR employees and contractors related to the RRM. 	<p>roads owned and maintained by New Gold they are addressed by an onsite construction team. Hazards identified on municipal or public roads are reported to the appropriate authority (Municipality or MTO).</p> <p>Reports of road hazards are communicated during the HSE Communication broadcast over all radio channels at shift start.</p>	
13.9.2	<p>To assess potential changes to TLU that could potentially derive from implementation of the RRM, RRR will carry out, or provide financial support for, the following activities:</p> <ul style="list-style-type: none"> • Subject to any terms of agreement with the local First Nations and Métis, periodically update Traditional Knowledge (TK) studies conducted for the RRM beginning five years after mine operations initiate, to determine if there have been any changes to resource harvesting patterns by local Aboriginal peoples as a result of the RRM, and the reasons for any such changes; • Conduct reviews at five year intervals, of the activities of a subset of RRR Aboriginal employees (representative cross section) to determine the effects of employment on their traditional activities; and • Confirm any expected changes in the availability of fisheries and wildlife resources to local harvesters, based on data derived from biological monitoring programs. 	<p>No updates were conducted in 2017.</p>	Ongoing
13.10.2	<p>RRR will carry out the following monitoring program to ensure the protection of cultural heritage resources:</p> <ul style="list-style-type: none"> • Maintain a record of all cultural heritage resources known to 	<p>New Gold engaged qualified Archaeologists and Built Heritage Specialists to records all resources prior to construction commencing. NG continues to actively engage local</p>	Ongoing

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	<p>occur in the vicinity of planned RRM developments, such that intrusion or damage to such resources can be avoided during construction, recognizing and respecting confidentiality limitations;</p> <ul style="list-style-type: none"> • Maintain an active dialogue with local residents and Aboriginal group representatives, having knowledge of specific areas prior to and during major construction activities, to provide guidance to supervisory staff on the likely or possible occurrence of as yet undocumented cultural heritage sites; • Enlist the services of a trained archaeologist during the conduct of major construction works to support RRR as needed, where there is a reasonable potential for encountering as yet undocumented cultural heritage sites; • Enlist the services of Elders or other cultural advisors in the event that cultural heritage resources are encountered (in addition to meeting all Regulatory requirements); and • Conduct a post-construction assessment of the state of known cultural heritage sites in the vicinity of RRM activities / structures to confirm the integrity of such resources. 	<p>residents and Aboriginal groups through meetings and visits.</p> <p>A New Gold employee is a qualified Archaeologist and has engaged Woodland Heritage Services to conduct ongoing investigations. New Gold agrees to enlist the services of Elders should Cultural Heritage resources be discovered. The company will agree to conduct post construction assessment of the state of known Cultural Heritage sites.</p>	
13.11.2	<p>RRR will carry out the following monitoring program to ensure the documentation of cultural heritage landscapes and built heritage resources as appropriate:</p> <ul style="list-style-type: none"> • Develop an initial record of all cultural heritage landscapes and built heritage resources known to occur near the planned RRM developments, such that intrusion or damage to such resources can be documented; and • Conduct a post-construction assessment of the state of known cultural heritage landscapes and built heritage 	<p>The initial record was completed by Untermann and McPhail. New Gold will complete a post-construction assessment of the state of known cultural heritage resources in 2018.</p>	Ongoing

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	resources in the vicinity of RRM activities / structures to confirm the status of such resources.		
13.12.2	<p>Traffic flow on local roads with more limited capacity is of greater interest, notably:</p> <ul style="list-style-type: none"> • Highway 600; • Teeple Road west of Highway 71; and • The East Access Road. <p>The intent is to document that these local roads are able to continue to function adequately, and within safe limits for both project and local traffic. Methods for measuring traffic use along local roads will include:</p> <ul style="list-style-type: none"> • Periodic traffic count surveys using automated traffic counters; • Employee surveys to determine transport routes to and from the mine site; and • Ongoing discussions with MTO and the Township of Chapple to support additional traffic volume monitoring studies if appropriate. 	<p>The Ontario Provincial Police request that New Gold share any traffic complaints with them.</p> <p>New Gold continues to monitor traffic and work closely with the Township of Chapple to address any concerns.</p> <p>The East Access Road (Korpi Road) is the primary route of traffic to the mine site, greatly reducing traffic on Teeple Rd/Hwy 600.</p> <p>New Gold also provides bus transportation for employees to/from Fort Frances and Emo.</p>	Ongoing
13.13.2	<p>Methods for documenting accommodations use in association with the RRM will include conducting contractor and employee surveys to determine:</p> <ul style="list-style-type: none"> • Community or nearest community of local residence; • Type of residence (rental or ownership); • Type of accommodation (existing or new); 	<p>New Gold is a residential operation meaning employees are required to live locally as rotational work schedules are not offered.</p> <p>As of December 31, 2017, 72% of New Gold employees were from the local human environment regional study area, therefore accommodation was not a consideration.</p>	Ongoing

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	<ul style="list-style-type: none"> • Type of occupancy (single, shared or family); and • Whether or not the employee / contractor is an existing local resident, or new to the area. 	<p>New Gold provides an accommodation for contractors on site and in a neighboring camp facility.</p>	
13.14 A	<p>It is anticipated the environmental management system will consider the following areas as significant environmental aspects of the RRM (although they may not be represented by individual management plans depending on the final environmental management system framework):</p> <ul style="list-style-type: none"> • Recycling and waste reduction program; • Mine rock (PAG / NPAG) management; • Water management; • General waste management; • Hazardous materials management; • Fuel handling and storage; • Fugitive dust management; • Sound management; • Wildlife management; • Traffic management; • Cultural awareness; • Heritage management; 	<p>During 2017 the EMS continued to be developed and ongoing during 2017.</p> <p>The EMS system continues to be developed using the ISO 14001 Standards and will enable the New Gold RRM the option of becoming ISO Certified.</p> <p>Both New Gold Corporate and the RRM have some policies and procedures in place and in draft form.</p> <p>The aspects listed will be fully considered in the final system. The following reviews/finals were completed:</p> <ul style="list-style-type: none"> • Recycling and waste reduction program; Draft in 2017 • Mine rock (PAG / NPAG) management; Finalized in 2016 • Water management; • General waste management; Draft in 2017 • Hazardous materials management; Finalized in 2017 	Ongoing

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	<ul style="list-style-type: none"> • Emergency response; and • Response to malfunctions and accidents. 	<ul style="list-style-type: none"> • Fuel handling and storage; Finalized in 2017 • Fugitive dust management; Finalized in 2017 • Sound management; • Wildlife management; Finalized in 2016 • Traffic management; • Cultural awareness; • Heritage management; • Emergency response; Reviewed in 2017 • Response to malfunctions and accidents. 	
13.14 B	<p>Environmental management system maintenance and effectiveness will be monitored through a variety of programs, such as:</p> <ul style="list-style-type: none"> • Formal and informal audits; • Environmental monitoring; • Non-conformance incidents, status of corrective actions; and • Stakeholder feedback. <p>Periodic management reviews will be completed to consider changing circumstances which could affect the continued</p>	<p>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.</p> <p>Reviews of the implemented New Gold RRM EMS will be completed once the EMS is finalized.</p>	Ongoing

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	suitability and adequacy of the plans, and to support continual improvement in overall effectiveness.		