

SECTION 5
NEW GOLD RAINY RIVER MINE
COMMITMENT REGISTRY

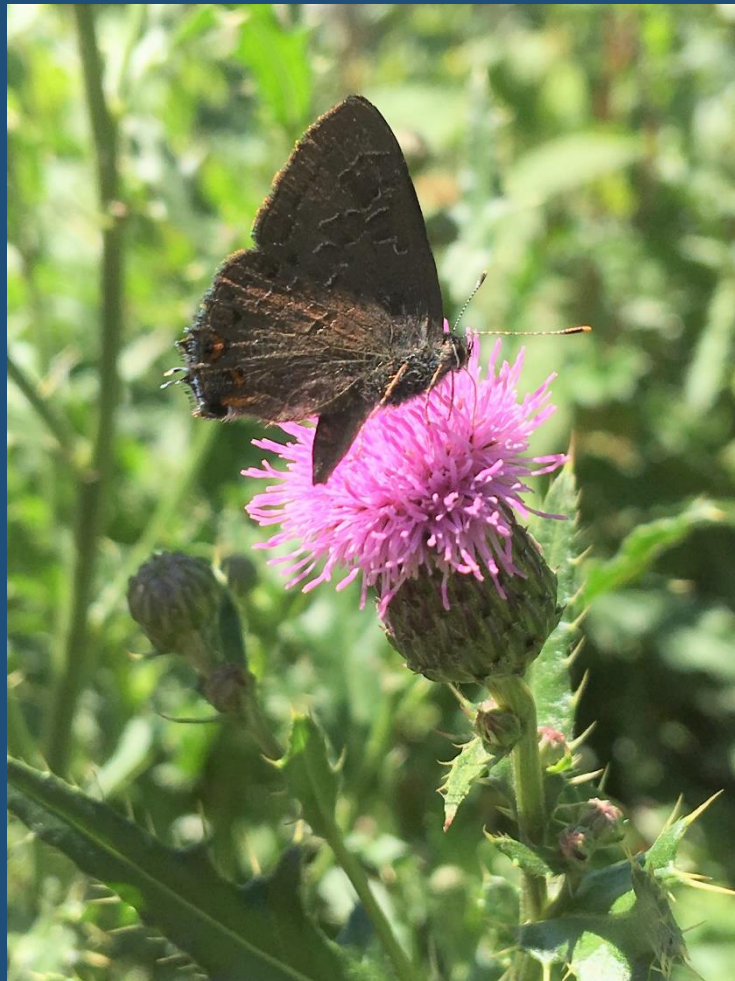


Figure 20 Striped hairstreak on thistle at Pinewood

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Condition/ Tracking #	Description	Status 2018	Date Completed
1	<p>The RRM will monitor and mitigate air emissions, particularly dust, through implementation of current industry best management practices.</p>	<p>Air quality monitoring program continued with monitoring of relevant air emissions parameters dictated in Rainy River Project Ambient Air Quality Monitoring Plan per ECA 04172-A2LR4V condition 10.1 (a) Ambient Air Quality Monitoring Plan. Data was collected at the two air quality monitoring stations located east and south-east of the project site by New Gold Environment staff. Data analysis, interpretation and quarterly reporting was performed by external laboratories and consultants.</p> <p>During 2018, there were two exceedances of total suspended particulates (TSP) and metallic iron concentrations measured in March and May at the Gallinger Road station. (See Appendix I for 2018 Exceedance Table.) Gallinger Road passes by the air quality station. Wind direction and road dust from light vehicle were defined as the probable causes of both exceedances. Mitigation measures included restricting road access for light vehicles, watering and application of Calcium Chloride on road surface.</p> <p>Fugitive Dust Best Management Practices Plan (BMP) for operations was updated and submitted to MECP for review in February and June of 2018. Best management practices include the use of water as dust suppressant on major haul roads and application of calcium chloride on major light vehicle routes during non-freezing conditions. In addition, speed limits on and around site were controlled. Baghouses and other dust suppression equipment were used at the processing plant and crusher. Drills used in the open pit were equipped with dust curtains and water dispersion during operations. Primary and auxiliary aggregate crushers used chemical and water dispersed by spray bars during non-freezing conditions. Commercial traffic was limited to site access along the east access or Teeple Road.</p>	<p>Air Quality Stations installed May 2015</p> <p>Monitoring is ongoing for life of mine.</p>

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2	<p>Dust Management Plan</p> <p>2. A fugitive dust best management practices plan will be prepared to identify all potential sources of fugitive dusts, outline mitigative measures that will be employed to control dust generation, and detail the inspection and recordkeeping required to demonstrate that fugitive dusts are being effectively managed.</p>	<p>An updated Fugitive dust best management practices plan for RRM operations phase was prepared as per ECA #0412-A2LR4V in February 2018. The updated plan identifies fugitive emission sources, composition and characterization of particulate emissions, fugitive dust control for each source, implementation and operation plus inspection and maintenance procedures. The updated plan was submitted on February 26, 2018 to MECP for review and approval. RRM construction activities also adopted the updated version of the plan. Both paper and electronic records were maintained during the 6 months of 2018. See appendix J for Dust Management Results.</p> <p>The Fugitive Dust Control Plan will be reviewed and updated in 2019 to better reflect current conditions.</p>	<p>ECA Application Submission – November 14, 2014;</p> <p>Fugitive Dust Best Management Plans submitted to MOECC February 4, 2016;</p> <p>Updated Water Use Plan for dust submitted to MOEC December 14, 2016.</p>
3	<p>Sound will be monitored during construction, operations and active closure phases consistent with Ministry of the Environment (MOE) requirements</p>	<p>During the first week of May and June of 2018, noise monitoring was conducted at two different Species at Risk habitat areas, located due north and south of the RRM open pit and TMA area. Monitoring determined if the sound levels from the RRM operations activities exceeded the sound level threshold of 50 dBA. This means 50 decibell A-Weighted sound level averaged over one hour (50 dBA_{Leq} determined through standard MECP NPC 103 monitoring procedures.) Three sound level exceedances were documented. All were attributed to natural occurrences such as bird/insect noise and thunderstorm activity.</p> <p>Additional sound monitoring was not conducted during 2018. An audit is planned for 2019. See Appendix I for 2018 Exceedance Table</p>	<p>Ongoing</p>
4	<p>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</p>	<p>Ambient air quality monitoring occurs at two air quality stations located along the eastern and southern boundaries of the mine site. The ambient air quality monitoring program strictly follows the Ambient Air Monitoring Program Plan that was reviewed and approved by MECP in 2016. Since the installation of the</p>	<p>Ambient Air Quality Plan submitted February 2016 and approved by MOECC in</p>

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	SO2. NG commits to conducting this monitoring which is also expected to be an approval requirement.	stations, MECP inspections occurred in 2015 and 2016. These inspections revealed no significant deficiencies. During 2018 the MECP did not conduct inspections of either ambient air quality monitoring station.	November 2016.
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.	During 2018 the Fugitive Dust Best Management Practices Plan (FDBMPP) for operations was updated and submitted to the MECP for review in February of 2018. At the request of the MECP, the plan was resubmitted for review in June of 2018. An Air Inspection conducted by the MECP during November and December of 2018 stated that more effort to mitigate fugitive dust was required and asked for an updated FDBMPP in April of 2019.	ECA Application Submission – November 14, 2014; Fugitive Dust Best Management Plans submitted to MOECC February 4, 2016; Updated Water Use Plan for dust submitted to MOEC Dec 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
7	<p>Planning measures aimed at reducing fuel and power consumption for the RRM site include the following:</p> <ul style="list-style-type: none"> • 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 • Maintaining site equipment and vehicles in good working order 	Implemented in 2018	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	through regular preventative maintenance.		
8	Monitoring of air quality will occur during construction, operations and active closure phases per Section 13.1.1 of the Final EA Report.	<p>Monitoring of air quality at the RRM site continued during 2018. New Gold Environmental staff collected raw data from the two air quality sampling stations as per the Ambient Air Quality Monitoring Plan. Stations are located to the south of the Site near the beginning of the Highway 600, and one to the east of the site along Gallinger Road.</p> <p>During 2018, there were two exceedances of total suspended particulates (TSP) and metallic iron concentrations measured in March and May at the Gallinger Road station. (See Appendix I for 2018 Exceedance Table) Gallinger Road passes by the air quality station. Wind direction and road dust from light vehicle were defined as the probable causes of both exceedances. Mitigation measures included restricting road access for light vehicles, watering and application of Calcium Chloride on road surface.</p> <p>Air Quality Monitoring Reports for each quarter of 2018 can be found in Appendix F.</p>	Ongoing
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.	<p>Measures that were implemented during 2015 and continued into 2018 to reduce sound included;</p> <ul style="list-style-type: none"> - Specific trucks that allow exhaust to pass through the truck box rather than directly through the exhaust pipe (muffles sound); - Reducing size of blasts where appropriate and scheduling those blast only at 1100 and 1500; - Tree buffers maintained where practical; 	Ongoing

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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.	<p>During the fall of 2018 the MECP conducted a review of the updated Acoustic Assessment Report (AAR) for early operations (January 2018). Inspection notes discussed that the site is operating at or near the noise limits set out in Ministry Publication NPC-300. To assess compliance with the report RRM has agreed to conduct an acoustic audit in Q2 of 2019 to verify the results of the updated AAR.</p> <p>See Appendix E for the RRP Early Operation Acoustic Assessment Report.</p>	Ongoing
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.	<p>There are three holes (199kg each) planned for the 5.5 to 6 ¾ inch drill pattern that will detonate in close proximity(8m) of each other.</p> <p>For the 9 inch, the design is to have 2 holes on average detonating (330kg each) in close proximity.</p> <p>Therefore, our average MIC can be estimated at 597-660kg per shot.</p>	Ongoing
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.	<p>Through regular communication, New Gold has established positive relationships with neighbour who are closest to the project mine site. When neighbour have any concerns or comments, they contact the Community Coordinator or Community Supervisor directly, who then ensure follow-up and closeout. In 2018, neighbour joined the New Gold team for a site visit and lunch at the accommodation facility. New Gold continues to communicate with Emcon and the Township of Chapple regarding dust management issues when advised by local neighbour of dust concerns. In September, one neighbor commented on noise and vibration from one blast. No exceedances were recorded, which was communicated back to the neighbor.</p>	Ongoing

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13	<p>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:</p> <ul style="list-style-type: none"> • 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 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 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 MDMER (MDMER), and to maximize the use of near 100% contact water 	<p>During 2018 the mill continued in plant treatment of tailings using SO₂/air in the cyanide destruction tank, where cyanide and metalocyanide complexes are oxidized to cyanate ion. The cyanate ion reacted with water to form ammonia and carbon dioxide. Free metal ions were precipitated with the addition of lime to form insoluble metalhydroxides and absorbed onto tailings particle solids, settling out of the slurry in the tailing's management area. Excess SO₂ was used in the process to ensure complete stoichiometric oxidation of cyanide. In 2018, construction of the Tailings Management Area (TMA) Cells 2 and 3 was completed. Treated tailings are continuously pumped from the mill through the tailings pipeline into TMA. The water discharge pond was also completed during fall of 2018. Construction of the water treatment plant begun in 2018 and is scheduled for completion in 2019. Construction of the wetlands is scheduled for 2019 with completion in 2020.</p> <p>Identification of potentially acid generating rock (PAG) continued to be managed through chemical testing and segregation into ore stockpiles within the low grade and East Mine Rock stockpile areas, as per requirements of the geochemical monitoring plan.</p> <p>Progression reclamation begin with the Tait Quarry area and will continue as discussed in the Rainy River Closure Plan Amendment (January 2019), which is undergoing final review.</p> <p>Drainage from low grade and east mine rock PAG stockpiles reported into the Mine Rock Pond in 2018. Construction of a drainage ditch surrounding the East Mine Rock Stockpile area commenced in the fall of 2018. Ditch construction is scheduled for completion in spring of 2019. The former Clark Creek was filled with nonacid generating rock (NAG) to provide a conduit for water movement from East Mine Rock Stockpile into the Mine Rock Pond. Recycling of water from the Mine Rock</p>	

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	<p>recycle for the processing plant water supply.</p>	<p>Pond for re-use in the mill process water supply continued during 2018.</p> <p>The current drilling and blasting contractor on site, Dyno Nobel, continued to use a straight emulsion for all blasting in 2018.</p> <p>As per MDMER 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 minimized during 2018 due to lack of available water for processing.</p>	
14	<p>Surface water runoff will be diverted from entering the pit or flowing through stockpiles by ditching or other means.</p>	<p>During 2018, surface water was diverted from the stockpiles and the open pit with a combination of permanent and temporary ditching and sumps. With the completion of Temporary Sediment Pond, Sediment Ponds 1 and 2, and Sumps 1A and 1B, West Mine Rock Stockpile has had a portion of permanent ditching completed and temporary ditches rerouted to drain to these structures. East Mine Rock Stockpile has had the southern portion of the permanent ditching completed with temporary internal water management systems sending all water to the Mine Rock Pond. The northern portion of the permanent ditching is scheduled to be completed Q1 2019. The open pit has expanded in the general north direction with a temporary north ditch developed to collect surface water from the West Creek remnant channel. The water is pumped to the Plant Site water management structures and used in ore processing. Temporary sumps are still in use for staging pumps to remove localized surface water runoff within the open pit footprint. This water is pumped to In Pit Sumps 4, 5, and 6. If discharge is planned, water is sampled per ECA and MDMER requirements and treated for suspended solids and ammonia if necessary. If no discharge is planned, these sumps reroute the water to Mine Rock Pond for ore processing.</p>	Ongoing

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15	Open pit dewatering water will be contained and if necessary, treated before it is discharged to the environment.	The open pit has expanded in the general north direction with a temporary north ditch developed to collect surface water from the West Creek remnant channel. The water is pumped to the Plant Site water management structures and used in ore processing. Temporary sumps are still in use inside the open pit for staging pumps to remove localized surface water runoff and groundwater seepage within the open pit footprint. This water is pumped to In Pit Sumps 4, 5, and 6. If discharge is planned, water is sampled per ECA and MDMER requirements and treated for suspended solids and ammonia if necessary. If no discharge is planned, these sumps reroute the water to Mine Rock Pond for ore processing	Ongoing
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 RRM. 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).	Ongoing
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.	Ongoing
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 pit. This commitment will be addressed at mine closure.	Ongoing
19	Should it be determined that future treatment is needed for stockpile	Pump back systems have been installed for Sediment pond 1 and 2. Interim ditch collects	Ongoing

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	runoff / seepage and overflow from the pit at closure, passive treatment options would be fully considered during the detailed design stage.	water and a water treatment system is being constructed.	
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 MDMER 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.	<p>Permanent ditch design in EMRS has been designed by qualified engineers based on 100 years storm event criteria. It has been constructed up to 2.2km in southern and half of eastern side of EMRS. The construction of the ditch at EMRS will continue into 2019 Q1.</p> <p>Permanent ditch design for WMRS is still being designed by qualified engineers based on a 25 year storm event. It has been budgeted and planned to be constructed in 2019 Q2-Q4.</p>	Ongoing
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 was completed and commissioned in 2018.	Ongoing
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 commissioned in December of 2017 and is being operated as per commitments.	Ongoing

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23	<p>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.</p> <p>NG proposes to utilize visual and geochemical data to identify that portion of the till overlying the bedrock which requires handling as PAG material, based on the characteristics of the clasts (loose stones) contained therein. Segregation is commonly utilized and MEND 5.4.2d (MEND Manual, Volume 4, Prevention and Control) indicates that segregation is 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 RRP. 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.</p> <p>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</p>	<p>A Geochemical Monitoring Plan for the Construction and Operation Phases was issued in accordance with MECP ECA 5178-9TUPD9 requirements and has been implemented at the RRM site.</p> <p>Monitoring was ongoing during 2018.</p> <p>Periodic sampling of till is ongoing during open pit stripping of till. Results have been in line with the initial interpretations. Additional testing on 13 samples to better understand the material including ABA, NAG testing with leachate analysis, whole rock analysis, and semi-quantitative XRD is being conducted.</p>	Ongoing

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	<p>derived PAG rock 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 MNM 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.</p>		
24	<p>Geochemistry monitoring:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p> <p>A field capping trial was commissioned in 2017.</p>	Ongoing

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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 2018 has either been stockpiled in the East Mine Rock Stockpile, used in the pit (for road building and padding in the overburden), stockpiled in the Tailings Management Area or used for upstream dam wall construction.	Ongoing
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 2018, 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. A mine rock cover treatment system was set up and monitored in 2018 with a vegetation cover test plot planned to be set up in 2019.	Ongoing
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 RRM 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. Also in 2017, a multi-cover system test plot was set up on the northeast side of the plant to test the proposed design through multiple years. In 2018, this multi cover system was monitored to ensure complete encapsulation was successful.	Ongoing
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: <ul style="list-style-type: none"> - 7 laboratory kinetic tests ongoing from previous years - 3 waste rock humidity cells - 2 tailings humidity cells - 2 tailings columns The 17 laboratory tests that were commissioned in 2017 were decommissioned in 2018	Ongoing

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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.	Ongoing
30	Site runoff and seepage will be collected, managed and treated per the Provincial and MDMER requirements.	Completed as required during 2018 in accordance with Provincial approvals (including ECA 5871-9VJQ2J and 5178-9TUPD9) and the MDMER. Surface water was monitored on and off site as per the Surface Water monitoring program. In 2018, there were no exceedances based on the Provincial or MDMER requirements.	Ongoing
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 RRM.	Completed during design
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. A water level transducer was installed in the West Creek Pond in April 2018. Continuing dry weather conditions through the summer and fall of 2018, and the removal of culverts along the West Creek Diversion prevented the establishment of a hydrometric station. One manual flow measurement was conducted in summer 2018 before the flow reduced to near zero due to dry conditions. A revised flow monitoring plan for the West Creek Diversion was presented in the 2018 update of the Rainy River Hydrometric Monitoring Plan and will be implemented when flows allow.	Ongoing

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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.	In the process of designing a system so non-contact water remains non-contact water from entering TMA and all other areas. Controls will be in place to keep clean water clean. West creek diversion is a large factor in keeping non-contact water away from the site.	Ongoing
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.	Completed 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	Ongoing
36	There will be secondary containment in place for tailings and contact water pipelines at the crossing of West Creek.	In 2016 tailings pipelines crossing West Creek to handle the transportation of tailings and water were double lined.	Completed 2016
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.	Majority of water will be taken from the Mine Rock Pond and dewatering of TMA, recycled to the process plant and excess treated through the WTP and stored in the WMP. The Operational Environmental Compliance Approval # 5178 9TUPD9 outlines the water recycled system for the project.	Ongoing

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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 2018, water was taken from the Pinewood River to supplement the site water inventory in the Water Management Pond. The water taking commenced on May 8, 2018 and continued through October 30, 2018, dependent on minimum threshold flows in the Pinewood River and other Permit to Take Water conditions. A total of 376,588 m ³ was taken from the Pinewood River during 2018 to supplement the site water inventory. As 2018 was a very dry year, it may be necessary to take water from the Pinewood River in the future if the total site water inventory is insufficient for processing ore. The taking of water from the Pinewood River after the initial water inventory volume was met is on a contingency basis.	Ongoing
39	Water recycle will be maximized, using approximately 100% water recycle for the processing plant water supply.	Majority of water will be taken from the Mine Rock Pond and dewatering of TMA, recycled to the process plant and excess treated through the WTP and stored in the WMP. The Operational Environmental Compliance Approval # 5178 9TUPD9 outlines the water recycled system for the project.	Ongoing
40	Local area lakes will not be used for process water supply for the RRM.	The RRM was designed to not require the need for process water supply to be taken from area lakes. This commitment was in compliance during 2018.	Ongoing
41	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.	<p>During 2018 process reagents and materials were handled and stored according to supplier and safety guidance, regulatory requirements and industry best practices.</p> <p>Mechanical maintenance areas have appropriate containment for used oil and other hazardous materials associated with mechanical repairs and maintenance to heavy equipment. New Gold RRM and on-site contractors producing hazardous waste were registered with HWIN. Certified hazardous waste transportation companies were contracted to remove hazardous waste from designated areas.</p> <p>New Gold Staff inspect these designated areas to ensure appropriate storage methods were being implemented.</p>	Ongoing

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		<p>Mill Operations stored reagents and chemicals used in ore processing either in dry storage facilities or within secondary containment areas.</p> <p>All reagents shipped to site are conducted by licensed transportation companies. When products arrive on site, they are offloaded by New Gold RRM operators who are trained in Transportation of Dangerous Goods.</p> <p>New materials being purchased by the company undergo a review of the Safety Data Sheets by the New Gold Health and Safety and Environmental Departments prior to being brought to site. The intent of this review is to ensure appropriate product use as well as appropriate handling and containment practices are in place.</p>	
42	<p>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.</p>	<p>Chemicals to be used in the process plant are stored indoors, within covered cold storage areas and beamed laydown areas to protect against spills to the environment. In 2018, 17 spills were reported to the MECP as per requirements of the Ontario Environmental Protection Act. (See Appendix I for exceedance table) Regulatory letter reports contained 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 and assign accountability to responsible individuals. This system insures that the spill is documented and cleaned up appropriately in a timely manner.</p>	Ongoing
43	<p>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 maximum credible earthquake. A remedial action plan would be developed in</p>	<p>Section 5.6.1 of the RRM Comprehensive Closure Plan Amendment (October 2017) outlines the Geotechnical Design Criteria for the TMA dams and Water Management Pond dams (WMP). It indicates that;</p> <ul style="list-style-type: none"> - the dams have been designed to meet the most severe flood and earthquake criteria 	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>consultation with appropriate government agencies in the event of dam breach.</p>	<p>being the probable maximum flood and maximum credible earthquake in accordance with the Ontario Lakes and Rivers Improvement Act requirements.</p> <ul style="list-style-type: none"> - 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 the 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 MNR as per conditions of the LRIA and accepted in August 2017, and a copy of the OMS can be found in the Supporting Documentation for Appendix Q. 	
44	<p>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.</p>	<p>Detailed design during 2018 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 (TMA) 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. Seepage collection systems will continue to be built along the downstream section of the TMA dam extensions.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 RRM 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 a part of the Lakes and Rivers Improvement Act (LRIA) Approval Process for the construction of 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 Appendix Q.	Ongoing
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.	Ongoing
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.	Ongoing
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.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
49	<p>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:</p> <ul style="list-style-type: none"> • 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; 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; 	<p>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 2017 as 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 to cover approximately 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.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
50	<p>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:</p> <ul style="list-style-type: none"> • 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 maximum flood); or • Raising the dam crest, as well as the spillway invert to further increase the depth of the TMA water cover. <p>In development of the above contingencies, trigger levels would be developed for implementation of the contingencies.</p>	<p>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.</p>	Ongoing
51	<p>Mitigation measures that will be used to reduce potential adverse effects to the Pinewood River aquatic system will include the following:</p> <ul style="list-style-type: none"> • Extensive contact water recycling for process plant needs to reduce overall water demands and to minimize final effluent 	<p>There were zero discharges from the Water Management Pond (WMP) to the Pinewood River in 2017. Authorization to deposit tailings in the Tailings Management Area (TMA) Starter Cell was received September 28, 2017 and deposition stopped on April 18, 2018. Authorization to deposit tailings in the TMA Cell 2 was received April 12, 2018 and is ongoing. Prior to deposit in the TMA, process plant effluent passes through an in-plant slurry</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>discharge volumes to the Pinewood River;</p> <ul style="list-style-type: none"> • 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 system for final effluent polishing of a major portion of the discharge; • Management of the site for ARD control during operations and following closure to prevent adverse water quality impacts to the Pinewood River; • 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; • Maintaining current fish habitat productivity; and • Implementation of an extensive monitoring plan for water quality and flow discharges, and receiving water aquatic life and habitat. 	<p>cyanide destruction (SO₂/AIR) treatment facility. Effluent is aged in the TMA and Water Management Pond for an extended period prior to supplemental treatment from the WMP effluent treatment plant and the Constructed Wetlands. The WMP effluent treatment plant is in the construction phase, to be completed 2019. A pilot test of the Constructed Wetlands was conducted in summer of 2018, and construction is scheduled for 2019.</p> <p>Management of site for ARD control during operations and following closure to prevent adverse water quality impacts to the Pinewood River; The Mine Rock Pond was constructed and commissioned in 2017. Construction of Sediment Ponds 1 and 2, and the East Mine Rock Stockpile perimeter ditching began in summer 2018.</p> <p>The DFO Freshwater Intake End of Pipe Guidelines were implemented in 2016 during the construction of the Pinewood River. Fish screens were also installed on all construction dewatering pumps during the construction of diversion structures and culvert installations. The construction of the Pinewood River crossing at Highway 600 was completed in 2016 and consisted of the installation of a clear span bridge with no in water work that would restrict fish passage. On-going monitoring under the Pinewood Biological Monitoring Plan for direct effects to fish was implemented in 2015. 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 are monitored under the Pinewood Biological Monitoring Plan for direct effects to fish.</p>	

Condition/ Tracking #	Description	Status 2018	Date Completed
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 MDMER. All discharge locations will be regularly sampled in accordance with environmental approval requirements and will provide insight as to ongoing treatment system performance.	<p>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 5 that were not in use in 2018. There were only 5 discharges from temporary discharge points in 2018. The discharges from these temporary discharge points are batch, not constant discharges, and are measured with flow meters. Water quality is sampled before and then again during every discharge and assessed against Provincial and Federal water quality requirements.</p> <p>Construction of the Constructed Wetlands is scheduled for 2019/2020.</p>	Ongoing
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 5 discharges from temporary discharge locations in 2018. All effluent met the environmental approval requirements.	Ongoing
54	Minimize the number of final effluent compliance points as reasonable.	Through 2018, there were nine approved effluent compliance points. Of the nine, one was not constructed, 5 were not utilized and the remaining 3 were only used a total of 5 times combined. None of the discharge points represent a constant discharge. It was necessary for the 3 effluent compliance points that were used to remain active in the early operations phase as a contingency plan, used to manage spring freshet as discharge criteria was met. During the Operational Phase, the current design requires four final discharge points; Sediment Pond 1 Discharge, Sediment Pond 2 Discharge, Water Management Pond Pipeline Discharge, and the Constructed Wetland Discharge points. In 2018, Sediment Ponds 1 and 2 were constructed however no discharges occurred. The Water Management Pond Pipeline Discharge line is also the Pinewood Water Taking line, which was still in	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
		use for water taking in 2018, so no discharges occurred.	
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 m ³ /d and 5,000 m ³ /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.	Completed
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. In 2018, the Updated Hydrometric Monitoring Plan for the Pinewood River was submitted to the MECP, which recommends the development of two new hydrometric stations as well as upgrading of the existing hydrometric station.	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 2018, there were nine final effluent discharge locations obtained through the Environmental Canada Metal and Diamond Mining Effluent notification process. These discharges are included under the Permits to Take Water from the MECP to regulate the volume of water. Water quality is measured at the discharge for both Federal and Provincial regulation limits.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 MECP is consistent with this commitment. The constructed wetland is scheduled for construction in 2019. In 2018 there were no discharges from the Water Management Pond.	Ongoing
59	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 Water Management Pond Discharge Pipeline was not required in 2018. A rock groyne, and potential alternatives, have been identified and New Gold will be required to obtain appropriate permit approvals (LRIA) prior to installation, planned for Summer 2019.	Ongoing
60	Scheduling of RRM development activities will consider environmental aspects, such as fish spawning.	<p>During the early operating stage of the RRM activities and mitigation measures previously implemented to consider environmental aspects such as fish spawning;</p> <ul style="list-style-type: none"> - construction activities near fish bearing waterbodies were scheduled outside of the fish spawning window. Fish salvage was conducted whenever construction activities affected fish bearing waters. - Culverts were removed along the West Creek Diversion during August to October, well outside of fish spawning windows as identified by the MNR through the LRIA permit process - Ambient air quality monitoring continued with data collected from Gallinger and Highway 600 	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
		<p>stations to ensure there was no impact to air quality.</p> <ul style="list-style-type: none"> - Water and dust suppressants as approved by the MECP were used to control dust on roads, excavating in the open pit and aggregate extraction to minimize impacts to air quality. - As in previous years, New Gold hired an Sediment Erosion Control expert to implement erosion control mitigation measures on site in order to reduce/eliminate sediment from entering water courses within the mine boundary - Vegetation buffers were left around creeks and water courses to protect aquatic life by preventing sediment runoff from high traffic roads and late stage construction activities. - Construction activities such as infilling Clark Creek Channel with clean nonacid generating rock continued, during the winter to lesson impacts on the environment. 	
61	<p>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.</p>	<p>To offset habitat loss New Gold has currently completed the following:</p> <ul style="list-style-type: none"> - 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 pond is expected to fill with 2019 freshet and activate the remaining 50% of the Stockpile diversion after filling the pond. West Creek pond and diversion allowed for suitable fish passage by the spring of 2018. White Suckers were seen spawning as far up the pond and diversion systems as the lower end of the Stockpile diversion; - Reclamation of Tait Quarry was completed in summer of 2018. 	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
62	<p>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.</p>	<p>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.</p>	Ongoing
63	<p>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.</p>	<p>The 2018, the RRM fish tissue quality monitoring program was conducted between September 10 and 14th in the Pinewood River downstream of the RRM. Fish were collected using fill nets and hoop nets. A total of 15 northern pike and 15 walleye of edible size were retained. Samples of the fish muscle tissue, liver and ovaries were removed and sent to a certified laboratory to be analyzed for metal accumulation. Chemical data collected was compared to previous data collected in 2017, 2016, 2015 and 2012 (baseline). The 2018 results indicated that tissue samples contained metal concentrations below human consumption benchmarks and were within the range of baseline (2012) concentrations. Tissue samples from six large northern pike and two large walleye revealed elevated levels of mercury concentrations. However, did not exceed the maximum acceptable concentration of mercury established by Health Canada. It is important to note that the accumulation of mercury in larger predatory fish tissue is common in northwestern Ontario. A copy of the 2018 Fish Quality Monitoring Report can be found in Appendix G.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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.	Fish tissue sampling of northern pike and walleye in the Pinewood River has been conducted in the fall of 2012 (baseline), 2015, 2016, 2017 and 2018. Statistical analysis of tissue chemical concentrations compared among the sampling period show no upward trends. The study will continue to be conducted annually and information shared with appropriate government authorities. Additional information regarding the sample results can be found in commitment number 63. A copy of the 2018 Fish Tissue Quality Monitoring Report can be found in Appendix G.	Ongoing
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.	During 2018 erosion and Sediment Control measures were provided in the permit applications for all major infrastructure works including TMA Cell 2 and 3, Sediment Ponds 1 & 2 and Water Discharge Pond. Each permit application, filed under the Lakes and Rivers Improvement Act (LRIA) and Environmental Protection Act, contains a sediment and erosion plan for each project/works that 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.	Daily inspection of the dams have been performed by the TMA operators (2 inspections per shift). The annual Dam Safety Inspection was carried out by Wood (Engineer of Record) for all dams on October 4, 2018.	Ongoing
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	Surface water was monitored on a monthly basis per permit conditions at sites upstream and downstream of the project footprint in 2019. Results were consistent with baseline studies.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
68	<p>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.</p>	<p>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 includes 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 basis.</p> <p>In the event of a water quality exceedance that doesn't meet the requirements of the Metal and Diamond Mining Effluent Regulation or the Provincial Water Quality Objectives, New Gold does inform Indigenous Communities via email and through communication at the Environmental Monitoring Board Meetings.</p>	Ongoing
69	<p>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.</p>	<p>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.</p> <p>In 2018 sediment sampling for reclamation was not completed. As the mine progresses through its operations stage New Gold intends to implement further sampling programs at contact water ponds and drainage works.</p>	Ongoing
70	<p>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,</p>	<p>No requests were made in 2018. A summary of water sampling data from monthly surface water sampling and water discharges are provided to the MECP office each month.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	and sequences of high precipitation years.		
71	There will be no sediment ponds associated with the aggregate pit(s).	There were no sediment ponds associated with the Roen Road Pit, Outcrop 3, Laydown 4, or Tait Quarry in 2018. There is one runoff 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 has underwent reclamation in 2018.	Ongoing
72	<p>Related to the transmission line:</p> <ul style="list-style-type: none"> • 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 • Should any erosion of the ground be identified at the end of the construction period (or during any intervening inspections), the 	Clearing of the transmission line right of way 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 was completed April 2016. No clearing, has occurred on the transmission line since that time.	Completed November 2015 to April 2016.

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>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</p> <ul style="list-style-type: none"> • 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 • Fueling and maintenance of vehicles will not occur within 50 m of surface waterbodies. 		
73	<p>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).</p>	<p>In addition to the 2017 completion, an Environmental Monitor from Big Island First Nations is to start in 2019. New Gold is looking at a First Nations Environmental Trainee to help build capacity.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
74	<p>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.</p>	<p>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 includes 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 basis.</p> <p>In the event of a water quality exceedance that doesn't meet the requirements of the Metal and Diamond 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.</p> <p>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 traditionally 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 waterways. A copy of the 2018 Fish Tissue Quality Monitoring Report can be found in Appendix G..</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 2018, non-acid generating rock was placed into the remnant Clark Creek channel ditch before East Mine Rock Stockpile advanced. This plan will continue through 2019 as the stockpile expands. The Mine Rock Pond was also commissioned, and the closure of Clark Creek channel occurred.	Ongoing
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 2018, four times each, if not frozen, dry or in need of repair.	Ongoing
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, damaged or dry, in 2018. Data from 2018 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. Background data collection continued in 2018, with nine local wells sampled.	Ongoing
78	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 background information for neighboring wells continued in 2018. Eleven neighboring property owners determined to be in the Zone of Influence (see map in plan) agreed to participate, however only nine well sampled were collected. 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 by 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.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 2018.	Ongoing
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.	<p>Installation of additional groundwater monitoring wells (post baseline studies) started in 2015 and was completed in 2016 in accordance with Provincial Approval requirements.</p> <p>In 2018, two replacement groundwater monitoring wells were installed adjacent to existing wells that could no longer be sampled, and five groundwater monitoring wells were repaired. Two new shallow wells were also installed as recommended to improve monitoring. The groundwater monitoring wells were sampled four times in 2018, if not frozen, dry or in need of repair.</p>	Ongoing
81	<p>Mitigation measures that will be used to reduce potential effects on groundwater include the following:</p> <ul style="list-style-type: none"> • 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; 	<p>The continued operation and construction of the RRM specific to the water management is consistent with this commitment:</p> <ul style="list-style-type: none"> • Water from dewatering activities is sent to the Water Management Pond, or treated, to meet effluent quality regulations and released at licensed discharge locations. The Mill is in operation, utilizing the cyanide destruction unit. ARD is being managed in the PAG dump as committed to. Runoff from the PAG dump during 2018 reported to the Mine Rock Pond and was used for processing in the Mill. RRM is still operating, 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 2018. 	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<ul style="list-style-type: none"> • Accelerating open pit inflow following mine closure, to the extent 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 2018 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 a deer killed in vehicle collision. The study continued in 2017 and 2018. A summary of the 2017 study results can be found under commitment number 168. A copy of the 2017 White Tailed Deer Tissue Sampling Report can be found in Appendix P.	Ongoing
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.	Ongoing
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	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 2018	Date Completed
	<p>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.</p>		
85	<p>The principal mitigation measures that are proposed to limit short and long term adverse effects to local vegetation communities include:</p> <ul style="list-style-type: none"> • 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. 	<p>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. Calcium Chloride, an MECP approved chemical used for suppression of road dust, was applied along major access roads and plant site roads. Revegetation along disturbed areas in Tait Quarry formed part of progressive reclamation in 2018.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
86	<p>In regards to the transmission line:</p> <ul style="list-style-type: none"> • 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 transmission line reliability (from 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. 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 • Mechanical means will be used for periodic vegetation height 	<p>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.</p> <p>No vegetation maintenance along the transmission line was required in 2018.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	maintenance along the transmission line, instead of herbicides.		
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 determined 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.	Ongoing
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 behavior 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 bulletins and during "tool box" talks employees are reminded about the importance of following this policy as well as reporting wildlife sightings. During 2018 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.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
89	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, and in "tool box" morning meetings	Ongoing
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 2018 were disposed of in an area of the site with limited to no human interaction or buried. In some scenarios samples may be taken for scientific studies.	Ongoing
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 2018 aspects of the program that were implemented include a white tailed deer tissue sampling program to establish a baseline of accumulated metals and cyanide in organ tissue. Also implemented was migratory bird point count surveys and it was the third year of the bat monitoring program. Thus far all studies called for within the Monitoring Plan indicate the RRM has little impact on the local wildlife, as expected. A copy of the reports can be found in Appendix S.	Wildlife Monitoring Program submissions to MNRF; Vers. 1 January 15, 2015 Ver. 2 April 20, 2015 Vers. July 15, 2015 Vers. 4 July 30, 2015 Version 5 February 2016
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.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 2018 nearly 15 kilometers of exclusion fencing was installed along the footprint of the Tailings Management Area. New Gold RRM obtains a scientific collectors permit from MNR each year which allows for the live trapping and relocation of reptiles and amphibians that may be impacted by activities on site.	Ongoing
94	<p>In regards to the transmission line:</p> <ul style="list-style-type: none"> • 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
95	<p>The primary mitigation strategies for limiting adverse effects to wildlife will include:</p> <ul style="list-style-type: none"> • Preventing hunting from occurring on all lands owned by NG (required for the safety of workers; this is currently ongoing during exploration as well); • Maintenance to the extent practical of a 120 m buffer zone adjacent to rivers and creeks to protect watercourses and their associated vegetated margins; • Restoration of disturbed habitats at closure, including the development of habitats capable of supporting a diversity of wildlife 	<p>The following mitigation strategies were applied during 2018;</p> <p>Hunting did not occur on site except for required trapping of nuisance beavers. Buffer zones were maintained around fish bearing waterways and where necessary temporary erosion control products were installed. New Gold RRM has installed speed limit signs on project roads and have implemented a site wide no tolerance policy for speeding which is enforced by radar.</p> <p>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. Regular bulletins regarding wildlife are emailed and posted on site. A log of collisions resulting</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>species, including ungulates, large predators, furbearers and bats;</p> <ul style="list-style-type: none"> • Enforcement of speed limits along proposed mine access roads to <p>reduce the potential for collisions with ungulates. 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 monitoring the effectiveness of the proposed mitigation and additional</p> <p>mitigation measures will be implemented if necessary;</p> <ul style="list-style-type: none"> • 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 behavior or presence in proximity to the mine. Workers and contractors will be made aware of seasonal changes in local mammal behavior or presence in proximity to the mine; • Treatment of the tailing's 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 	<p>in wildlife mortality log is kept and submitted in Appendix L.</p> <p>Wildlife awareness training is provided to all contractors and employees during site orientation.</p> <p>Regular effluent sampling has shown WAD cyanide in tailings generally reaches the Tailings Management Area (TMA) at 1 mg/L or below. Nearly 15 kilometers of fencing was installed around the footprint of the TMA. Tailings currently remain submerged as much as possible and will be submerged and covered with overburden at closure.</p> <p>The RRM follows a Best Management Plan for dust suppression that was developed and approved by the MECP in 2016. Food waste is removed on a frequent schedule and stored only in waste bins with lids until removed.</p>	

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>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;</p> <ul style="list-style-type: none"> • Minimizing dust production along primary haulage routes by implementing dust suppression methods and thereby minimizing the 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. 		
96	<p>Mitigation measures that will be used to reduce potential adverse effects to amphibians will include the following:</p> <ul style="list-style-type: none"> • 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 	<p>During the planning stage of the project, the size of the project site was taken into consideration and a compact design was 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 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 an increase in frog mortality.</p> <p>Wildlife awareness training is provided to all contractors and employees during site orientation. Bulletins regarding wildlife awareness are made throughout the year.</p> <p>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. Cell 1</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>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;</p> <ul style="list-style-type: none"> • 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); <p>Mitigation measures that will be used to reduce potential adverse effects to amphibians will include the following:</p> <ul style="list-style-type: none"> • 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 behavior or presence in proximity to the mine; • 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; • Discharge of effluent that will result in protection of aquatic life standards in the Pinewood River so that no adverse water quality 	<p>reached capacity April 2018 and exposed tailings will be covered in 2019. Cell 2 was active from April to December of 2018 and therefore plans have not been made to cover it yet.</p> <p>A wildlife exclusion fence was installed around the TMA and the reptile barrier will be completed in 2019 weather permitting.</p>	

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>effects to amphibians are anticipated;</p> <ul style="list-style-type: none"> • Maintenance of generally abiotic conditions within the TMA to discourage wildlife presence; and - 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. 		
97	Generally abiotic conditions will be created within the fenced TMA during operations to limit the interest of the pond to waterfowl.	Water quality is considered to be abiotic based on weekly testing results and periodic acute toxicity sampling. To the extent possible the TMA has been cleared of trees and the area is monitored daily for birds which are hazed with bangers when present.	Ongoing
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 2018 was in full consideration of environmental aspects and no known timing conflicts occurred.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 MNR. EWPW and Common Nighthawk are like species and the management plan will benefit both species. Indigenous communities are playing a role in the progressive reclamation that will be dictated by the management plan.	Ongoing
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 th 2014
101	The primary mitigation strategies for limiting adverse effects to birds and habitat: • Inclusion of wildlife awareness information into regular safety and	The following mitigation strategies for limiting adverse effects on birds and habitat were implemented during 2018; 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	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>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 behavior or presence in proximity to the mine;</p> <ul style="list-style-type: none"> • 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. Should eagles continue to use the nest site and raise offspring, work will 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 	<p>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 2018. 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). There 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. There is a healthy population of Bald Eagles in the area, at one time more than 10 were seen feeding on a deer carcass that had been removed from a road way.</p>	

Condition/ Tracking #	Description	Status 2018	Date Completed
102	<p>In regards to the transmission line:</p> <ul style="list-style-type: none"> • 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; • 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 	<p>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.</p> <p>Prior to and during the construction period no sticks nests were identified.</p> <p>A vegetation and breeding bird survey was conducted by qualified biologists during 2014 and no rare plants were identified in the construction area.</p> <p>The separation of conductor wires was reviewed during the design of the hydro line to ensure spacing distance was adequate. - Completed April 2016</p>	Completed April 2016.

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>preclude larger avian species, particularly raptors which frequently</p> <p>use hydro pole for perching or nesting, from electrocution by contacting two conductor wires simultaneously;</p> <ul style="list-style-type: none"> • 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. 		
103	<p>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.</p>	<p>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.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
104	<p>The RRM footprint has been altered through consultation with the MNR in order to further avoid known whip-poor-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).</p>	<p>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 necessary while maintaining site safety aspects.</p>	Ongoing
105	<p>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.</p>	<p>A monitoring plan was developed in 2015 and implemented as required during 2018 in accordance with ESA FF-C-001-14. New Gold retains trained biologists to conduct annual monitoring.</p> <p>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 2019.</p> <p>A draft of the EWPW Management plan will be submitted to the MNRF in early 2019, and implementation of that plan will begin in 2020 if possible.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 open-country 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 basis.	Ongoing
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. In 2016, two nesting attempts were made in one structure, but no eggs were ever laid. During 2018, the artificial structures were monitored however there were no nesting attempts.	Ongoing
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).	RRM site lighting fixtures were commonly used in areas close to the main process plant or in construction areas. Visual inspections in these areas were performed when light plants were in use. Issues, such as lighting fixtures oriented at improper angles, were documented in InControl, a computer tracking program used to record environmental and safety concerns. Light plant issues not addressed in a timely manner were shut down and removed from site at the area owner's expense.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 four annual monitoring reports. As the project advances opportunities for habitat development post closure will be examined.	2018 Annual SAR Monitoring Report submitted to MNRF January 15, 2019
110	<p>Mitigation measures that will be used to reduce potential adverse effects to Eastern Whip-poor-will will include the following:</p> <ul style="list-style-type: none"> • Provision of compensatory whippoor-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); • Maintenance of forest buffers between RRM components and whippoor-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 	<p>These measures have been implemented since 2015 and continued to date.</p> <p>New Gold RRM will fund a separate / independent research program as a requirement and in accordance with the ESA permit.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>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;</p> <ul style="list-style-type: none"> • 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. 		
111	<p>The primary mitigation strategies for limiting adverse effects to Bobolink will include:</p> <ul style="list-style-type: none"> • Restricting the development of open country habitats to periods outside the breeding bird season which occurs from May 1 to July 	<p>Since the start of construction (2015) New Gold RRM has implemented the mitigation strategies listed in this commitment on site.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>31;</p> <ul style="list-style-type: none"> • 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; • 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 2018	Date Completed
112	<p>Mitigation measures that will be used to reduce potential adverse effects to Barn Swallows will include the following:</p> <ul style="list-style-type: none"> • 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 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 	<p>The RRM began 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 four years. Nesting attempts occurred for the first time in 2016 in any of the structures. In 2018 there were no nesting attempts. During regular operation of the Truck Shop the doors are often open, regrettably a pair of barn swallows nested in the Truck Shop and one juvenile Barn swallow was found dead. The juvenile Barn swallow had tried to fledge from the nest with little success and attempts were made to save it. This was reported to MNR and EC. 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. This nest was not found until after the fledgling was discovered and not in the way of operations.</p> <p>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.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>encouraged and does not cause problems to mine operations.</p> <ul style="list-style-type: none"> • 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 monitoring 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. 		
113	<p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>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 occur 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.</p> <p>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 mine site with no colonization in high vehicular activity or areas of concern. Currently there are no mitigation measures necessary.</p> <p>These measures have been implemented since 2015 as part of general orientation. Seasonal changes in wildlife behavior are</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<ul style="list-style-type: none"> • 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 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. • Inclusion of wildlife awareness information into regular safety inductions performed by the mine. Workers will be made aware of seasonal changes in wildlife behavior 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. 	<p>communicated via bulletins and tool box talks. Tailings have been treated as required since September 14, 2017.</p> <p>Progressive reclamation working towards closure is on-going, at the end of 2018 an approximate 180 ha of mine site is considered reclaimed.</p>	

Condition/ Tracking #	Description	Status 2018	Date Completed
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 Chiefs from Kyle Stanfield, October 2013).	New Gold met with Elders and representatives of two communities in 2018 (Animakee Wa Zhing #37 First Nation and Anishinaabeg of Naongashiing) and gathered Traditional Knowledge for use in helping select plants and trees to plant in vegetation trial plots that will be planted in spring 2019. The information gathered from TK and trial plots will be used for reclamation as needed now and mine closure.	Ongoing
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 2018	Date Completed
117	<p>NG has an open invitation for First Nations, the MNO and regional stakeholders to participate in all baseline and environmental monitoring programs, including Whip-poor-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).</p>	<p>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.</p> <p>In addition New Gold has developed Environmental Monitoring Boards as a method of communicating on site environmental activities and research studies to the public.</p>	Ongoing
118	<p>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.</p>	<p>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.</p>	Ongoing
119	<p>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).</p>	Completed as of March 3, 2014.	March 3, 2014.

Condition/ Tracking #	Description	Status 2018	Date Completed
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 and 2018. The intent of the project is to collect tissue samples to monitor for metal and cyanide accumulation. In 2016 Aboriginal Communities were consulted, 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 and 2018.	Ongoing
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.

Condition/ Tracking #	Description	Status 2018	Date Completed
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 analyses 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 2018 related to the RRM that could affect the health of Indigenous people. The Deer Tissue Monitoring Program was run in 2018 which is the third year of the program. Copies of the 2016 and 2017 Deer Tissue Monitoring Report have been made available to all stakeholders and in 2019 the 2018 report will be distributed.	Ongoing
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).	An Indigenous Community Coordinator has been employed by New Gold to act as a liaison to employees and is available to meet with employees. New Gold provides employee benefits and employee assistance programs to all staff and their families. New Gold also has seasonal public ceremonies, established tobacco offering stations and provides an employee assistance program as part of the benefits provided to all employees. Additionally, ceremonies have been provided to employees by request.	Ongoing
125	As a best practice and acting as a responsible neighbor, NG will notify local stakeholders of project activities as appropriate.	New Gold provided a site tour to for the neighbors. Additionally, in 2018, there were five public tours and two newsletters distributed district wide. Neighbour Tour - August 22, 2018 Public Tours - July 26, 2018 (2), August 2, 2018 (2), August 7, 2018 Newsletter distribution - July 27, 2018 and December 20 th 2018 Blast notification is also provided for any blasts that occur outside of the usual blast times or if the blast is considered to be at a location that may impact the neighbour.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 2018 one member of the New Gold Environmental Department completed the Problem Black Bear Management Course provided by MNR. This brings the total number of staff trained to three. 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.	Ongoing
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
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.	The Environment department met with Elders and representatives of two communities in 2018 (Animakee Wa Zhing #37 First Nation and Anishinaabeg of Naongashiing) and gathered Traditional Knowledge for use in helping select plants and trees to plant in vegetation trial plots that will be planted in spring 2019. The information gathered from TK and trial plots will be used for reclamation as needed now and during mine closure.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
130	<p>NG is supportive of the further development of mitigation measures in relation to traditional hunting (and plant gathering), which could potentially involve:</p> <ul style="list-style-type: none"> • 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. 	<p>New Gold has a Participation Agreement with BGRFN that takes this commitment into consideration.</p>	Ongoing
131	<p>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.</p>	<p>NG remains committed to providing access to all areas of the site that are safe to do so. In 2018, Indigenous 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. Several site tours were provided:</p> <ul style="list-style-type: none"> Archaeology site tour - September 19, 2018 Whitefish Bay site tour - September 6, 2018 Naicatchewenin FN site tour - August 23, 2018 Big Grassy FN site tour - August 13, 2018 RRFN/Naicatchewenin FN site tour - July 26, 2018 AON site tour - July 17, 2018 Whitefish Bay school tour - June 6, 2018 Big Grassy high school site tour - May 30, 2018 RRFN site tour - January 17, 2018 	Ongoing
132	<p>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</p>	<p>New Gold remains committed to the opportunity for ceremony. New Gold hosted two ceremonies in 2018, one in Spring and one in Fall.</p> <ul style="list-style-type: none"> Spring Ceremony - May 23, 2018 Fall Ceremony - October 3, 2018 	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>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.</p>		
133	<p>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.</p>	<p>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.</p>	Completed April 2016
134	<p>134. NG will engage with local stakeholders as appropriate to provide notification of project activities and to mitigate potential impacts as practical.</p>	<p>NG sent out two newsletters in 2018, hosted public tours, participated in local events and provided presentations.</p> <ul style="list-style-type: none"> • Newsletters: July 27, 2018 and December 20, 2018 • Public Tours: July 26, 2018, August 2, 2018, and August 7, 2018 • Archaeology Tour: September 19, 2018 • Presentation and Site Tour: Minnesota Minerals Coordinating Committee, July 20, 2018 • Baibombeh School Site Tour: June 6, 2018 • Rainy River High School Site Tour: May 30, 2018 • MP-Thunder Bay/Rainy River Tour - May 16, 2018 • Engineers (LOTW chapter) Tour - May 12, 2018 • Presentation and Site Tour: Sturgeon Creek School October 23, 2018 • Presentation: St. Francis School September 27, 2018 • Presentation - AKRC Mining Conference February 13, 2018 • Advisory Services Site Tour: November 1, 2018 	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
		<ul style="list-style-type: none"> • Presentation: Mikinaak Onigaming Public School October 30, 2018 	
135	<p>Related to the transmission line:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p>	<p>Commitment completed 2015</p>

Condition/ Tracking #	Description	Status 2018	Date Completed
136	<p>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.</p>	<p>In 2015, NG implemented a Human Resource Strategy that focused on local employment which continued through 2018. As of December 31, 2018, 73% of New Gold employees were from the regional study area. Local and Indigenous content is a consideration in all RFP's issued.</p> <p>Training and development is provided to all operations employees to ensure legislated requirements are met.</p> <p>Since 2015, New Gold RRP 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.</p>	Ongoing
137	<p>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.</p>	<p>NG continues to send out newsletters and engage with local stakeholders. 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 post-construction activities continue.</p> <ul style="list-style-type: none"> • Newsletters - distributed July 27, 2018 and December 20, 2018 • Local Ec Dev & business interest tours or meetings: January 17, 2018, April 20th 2018, September 27, 2018, October 22, 2018, November 1th 2018 • Entrepreneur workshop: August 20, 2018 • Industry Advisory Group meetings: May 24, 2018, October 31, 2018 	Ongoing
138	<p>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</p>	<p>NG completed an agreement with a local bait harvester on August 11· 2017.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 2018 local logging companies were hired to remove timber from site.	Ongoing
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.	Authorizations granted from the MNRF. In 201 a local logging company was hired to remove merchantable timber to support project development	Ongoing
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 2018 (Construction Phase and start of Operations Phase).	Ongoing
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 regard to PPE.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 analyses 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 2018 related to the RRM, that could affect the health of Indigenous or non-Indigenous people.	Ongoing
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).	An Indigenous Community Coordinator has been employed by New Gold to act as a liaison to employees and is available to meet with employees. New Gold provides employee benefits and employee assistance programs to all staff and their families. New Gold also has seasonal public ceremonies, established tobacco offering stations and provides an employee assistance program as part of the benefits provided to all employees. Additionally, ceremonies have been provided to employees by request.	Ongoing
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 2018 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.	Ongoing
147	Recognizing that safety of workers is paramount, NG will attempt to reduce light pollution as possible.	New Gold ensures 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.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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.	<p>All personnel on site receive a site orientation.</p> <p>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.</p> <p>In order to prepare for major events, two fire drills were held in 2018.</p>	Ongoing
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 2018.	Ongoing
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.	<p>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 remained ongoing when necessary to ensure safety.</p> <p>To date public access has been maintained on the Marr Road via Korpi Road and signs have been installed to direct traffic accordingly.</p> <p>A gate house has installed at the main entrance to the site and security personnel stop all vehicles to ensure the driver and passengers have appropriate identification to be on site. Additionally, security staff are responsible for patrolling the site.</p>	Ongoing
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.	<p>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.</p> <p>New Gold has always been committed to informing the public of the projects potential impacts by providing project updates through</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
		public open houses, meetings, advertisements and newsletters.	
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.	<p>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.</p> <p>Ownership of the new portion of Highway 600 was turned over to MTO in 2017.</p>	Completed 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.	Ongoing
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.	<p>Has been implemented.</p> <p>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.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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.	Ongoing
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.	Ongoing
159	Notification and/or reporting of any vehicular accidents and spills will follow Provincial (Ministry of the Environment) and other applicable requirements.	During 2018, 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.	Ongoing
160	<p>With regards to controlling adverse traffic effects during transmission line construction:</p> <ul style="list-style-type: none"> • 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 2018	Date Completed
161	<p>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.</p>	<p>To alleviate pressures on regional housing supply and hoteliers, during 2018 NG has:</p> <p>1) continued to contract a local Indigenous business to provide a 400+ 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.</p> <p>2) committed to local employment</p> <p>Previous to 2018</p> <p>3) worked with local developers to construct new accommodation (an apartment facility) in the Township of Emo</p> <p>4) 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.</p>	Ongoing
162	<p>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.</p>	<p>Completed on April 14, 2015. A number of former local residents have come forward to request copies of the reports which NG provided.</p> <p>During 2018, buses were used to transport employees to site from Fort Frances, Emo, Rainy River, Barwick and Stratton.</p>	Completed April 14, 2015.

Condition/ Tracking #	Description	Status 2018	Date Completed
163	<p>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 will 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.</p>	<p>In 2018, New Gold contributed financially to the Rainy River District Social Services Administration Board.</p> <p>Also, NG is reducing strain on the local medical system by employing a Nurse Practitioner on site that is available to all employees.</p>	Ongoing
164	<p>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.</p>	<p>In 2016 New Gold implemented a deer tissue monitoring program to establish baseline data of metal and cyanide accumulation in deer tissue for the population 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. In 2017 36 samples were submitted. 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 in the environment and can be introduced by other human activities. The study continued in 2018 and is planned to run again in 2021, 2024, 2027, 2030, 2033 and 2036 or as requested/needed.</p> <p>A copy of the 2017 White Tailed Deer Tissue Sampling Report can be found in Appendix P. The 2018 report will be available in the spring of 2019.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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.
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.	A dedicated Emergency Response Coordinator was hired in October 2018 to put more emphasis on ER preparedness.	Ongoing
167	<p>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:</p> <ul style="list-style-type: none"> • 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.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>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.</p> <p>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.</p>	<p>All New Gold RRM staff and contractors undergo Cultural Awareness training as part of the site induction.</p> <p>Additionally, New Gold has a Participation Agreement with BGRFN which addresses additional mitigation and accommodation measures.</p>	
168	<p>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.</p>	<p>In 2016 New Gold implemented a deer tissue monitoring program to establish baseline data of metal and cyanide accumulation in deer tissue 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 2017 36 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 in 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. In regard to the 2017 deer tissue report it should be noted that contaminant levels were shown to be lower in 2017 versus</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
		<p>2016. The study continued in 2018 and is planned to run in 2021, 2024, 2027, 2030, 2033 and 2036 or as requested/needed. A copy of the 2017 White Tailed Deer Tissue Sampling Report can be found in the Supporting Documentation for Appendix XXX. The 2018 report will be available in 2019. Results from the 2018 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 2018 Fish Tissue Quality Monitoring Report can be found in Appendix G</p>	
169	<p>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.</p>	<p>This commitment is currently not applicable to the current stage of the project. The constructed wetland is planned for construction in 2019.</p>	Ongoing
170	<p>Unterman McPhail will prepare a complete description of the evaluation process for resources identified of cultural heritage value or interest in a memo format.</p>	<p>The memo was completed September 11, 2013.</p>	<p>Commitment completed September 11, 2013.</p>
171	<p>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.</p>	<p>Not applicable to 2018.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
172	<p>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.</p>	<p>Site #11 was demolished in 2015 as it was deemed to be hazardous as it was not structurally fit. Unique features, such as 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.</p> <p>Site #13 remains in situ. Infrastructure (tails line) has been constructed prohibiting access to the structure.</p>	Ongoing
173	<p>NG will provide follow-up documentation related to Cultural Heritage Assessment Report / Cultural Heritage Documentation Reports to the following local museums and archives:</p> <ul style="list-style-type: none"> • 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. 	<p>Completed on April 14, 2015.</p> <p>A number of former local residents have come forward to request copies of the reports which New Gold RRM provided.</p>	Commitment completed April 14, 2015.
174	<p>Monitoring would occur for the following durations:</p> <ul style="list-style-type: none"> • Archaeology: construction phase • Built heritage: construction phase 	<p>New Gold had an onsite Archaeologist throughout the construction phase. No additional Archaeological or built heritage resources were identified in 2018.</p>	Completed 2015 to 2017
175	<p>With regards to protection of cultural heritage values during transmission line construction:</p> <ul style="list-style-type: none"> • 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 	<p>No human remains or cultural resources were identified during transmission line clearing in 2015 to 2016; the Transmission Line construction was completed April 2016.</p>	Completed April 2016.

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>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.</p> <ul style="list-style-type: none"> • 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 identified; and • 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 2018	Date Completed
176	<p>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.</p>	<p>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.</p> <p>Archaeology clearance letter was received on the transmission line on Dec 29, 2014.</p>	Completed December 29, 2014.
177	<p>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.</p>	This condition will be applied at the time of mine closure and reclamation.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 2018.	Ongoing
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).	Ongoing
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.	Completed January 9, 2015.
181	Environmental monitoring will be conducted in accordance with standard practice and regulatory requirements, including any site-specific environmental approvals.	<p>Since the start of construction New Gold has had environmental personnel assigned to environmental monitoring to satisfy regulatory requirements and permit approvals. During 2016 and 2017 several of these monitoring protocols were written into Operational Policies for the Environmental Department. New Gold's Environmental Department also launched a site wide computer program (Intalex) in 2017 which houses all of the permit conditions and compliance conditions for the RRM. 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.</p> <p>In addition to 2017 we are in the process of constructing an EMS system that will be in compliance with ISO 14001.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 2018, 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.	Ongoing
183	Procedures will be regularly reviewed as part of the environmental management system.	<p>In 2018, the design of an ISO 14001 compliant Environmental Management System (EMS) was completed for the RRM.</p> <p>Both New Gold Corporate and the RRM have policies and procedures in place that are reviewed.</p> <p>Procedures will be regularly reviewed as part of the EMS.</p>	Ongoing
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 2018, 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.	Ongoing
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 for each chemical. This aspect is included as part of the RRM Health and Safety WHMIS Program. WHMIS Program was rolled out to all employees in 2018.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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.	Ongoing
187	<p>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:</p> <ul style="list-style-type: none"> • 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 Indigenous 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 Intellex, where assigned employees are responsible for tracking performance against these commitments and conditions.	Ongoing
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.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
189	<p>A list of FMP commitments made during the EA process will be maintained by NG, indicating where appropriate:</p> <ul style="list-style-type: none"> • 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 	This registry addresses these conditions.	Ongoing
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.	<p>In 2018, the design of an ISO 14001 compliant Environmental Management System (EMS) was completed for the RRM.</p> <p>Environmental aspects and potential impacts of the mine were incorporated into the design framework of the EMS.</p>	Ongoing
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.	<p>In 2018, the design of an ISO 14001 compliant Environmental Management System (EMS) was completed for the RRM.</p> <p>Formal training programs, through Training and Awareness requirements, will focus on RRM's commitment to ongoing environmental compliance.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
192	Periodic management reviews will be 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.	<p>In 2018, the design of an ISO 14001 compliant Environmental Management System (EMS) was completed for the RRM.</p> <p>As part of the EMS, periodic management reviews will be conducted to ensure continuous improvement.</p>	Ongoing
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 MNM on 26 Oct 2017. This amendment was necessary as the mine transitioned from construction to operations. Updates have been provided to the current closure plan.	Ongoing
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).	Ongoing
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.	<p>NG hosts two annual ceremonies at site; additionally, Indigenous 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.</p> <p>During 2018 the following ceremonies were held onsite:</p> <p>Spring Ceremony: May 23, 2018</p> <p>Fall Ceremony: Oct 3, 2018</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
		Spirit House Opening Ceremony: March 23, 2018 Spring Blessing Ceremony: May 11, 2018	
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.	Completed January 9, 2015.
197	<p>Related to transmission line construction, environmental monitoring will include (but will not be limited to) inspection of:</p> <ul style="list-style-type: none"> • 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 • Any requirements contained in environmental approvals and permits required to construct the transmission line. <p>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</p>	<p>Work on the transmission line was completed in April 2016.</p> <p>The conditions outlined in this commitment were achieved.</p>	Completed April 2016.

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>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 operation, coincident with other aerial surveys.</p>		
198	<p>NG will continue to communicate closely with First Nations and the MNO regarding the Project. (Letter to Chiefs from Kyle Stanfield, October 2013).</p>	<p>NG has several Participation Agreements / Impact Benefit Agreements in place which identify ongoing communication protocols:</p> <p>FFCS (with Seine River, Lac La Croix, Couchiching and Mitaanjigamiing First Nations) - March 22, 2012</p> <p>Rainy River First Nations/Naicatchewenin First Nation - October 10, 2014</p> <p>Big Grassy River First Nation – January 9, 2015</p> <p>Metis Nation of Ontario - November 25, 2014</p> <p>Anishinaabeg of Naongashiing First Nation - October 31, 2017</p> <p>Ojibways of Ongigaming First Nation - May 24, 2017</p> <p>Naotkamegwanning First Nation - April 19, 2017</p> <p>Animakee Wa Zhing #37 First Nation - February 13, 2018</p> <p>In addition, NG provides regular updates through newsletters, public presentations and individual meetings and emails with community representatives.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 RRP.	Ongoing
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 RRM, 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.	Ongoing
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.	Ongoing
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.	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
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 Indigenous groups on the transfer of artifacts. No artifacts were transferred from the archaeologist during 2018.	Ongoing
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.
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. No development of the Richardson trail took place in 2018.	Ongoing