

SECTION 6

NEW GOLD RAINY RIVER MINE

FOLLOW UP MONITORING PLAN

REGISTRY



Figure 21 Pinewood River ice going out

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Condition/ Tracking #	Description	Status 2018	Date Completed
13.1.	<p>RRR expects that it will be responsible to carry out the FMP (Follow Up Monitoring Plan); and further, that the involved Federal and Provincial agencies and authorities will have a review and monitoring role regarding the implementation of the FMP by RRR and will require RRR to take corrective action for non-compliance as appropriate. Local Aboriginal groups are considered by RRM to be involved parties for the purposes of the FMP, and accordingly, local First Nations and Métis will be provided the results of the FMP.</p>	<p>Highlights of the Follow Up Monitoring Plan submitted in Section 13 of the Provincial Environmental Assessment for the Rainy River Project have been included in this Compliance Report. The Follow Up Monitoring Plan was originally provided with New Gold's Environmental Assessment to the MECP for review and input by government agencies. New Gold has involved government agencies and Indigenous groups in the implementation of their monitoring programs and results.</p> <p>New Gold RRM continues to meet with Environmental Monitoring Boards which are attended by local Indigenous Groups and discuss ongoing environmental monitoring, research programs and results. Popular topics of discussion include; water quality, wildlife and air quality.</p> <p>New Gold RRM continues to provide onsite tours for government agencies, Community members and employee's families to discuss mining operations, ore process and environmental monitoring.</p> <p>New Gold involved the MNRF on the creation and implementation of the Rainy River Projects Terrestrial Monitoring Plan (Finalized in 2016) The Environmental Department provides the MECP with monthly updates on water quality sampling and project updates related to water taking, construction and water quality. Additional reports associated with the monitoring programs outlined in the Follow Up Monitoring Plan have been shared with the appropriate government agencies (i.e.; Fish Tissue Sampling (DFO), Air Quality Monitoring and Acoustic Monitoring (MECP) and are included as supplemental information with this report.</p>	Ongoing
13.2.2	<p>For fugitive dust from roads, stockpiles and open pit operations, RRM will assess the effectiveness of planned dust control measures both visually by plume assessment, and using dust fall jars and high-volume samplers for total particulate and PM2.5. Dust fall samples will be collected monthly during the non-winter period for the construction,</p>	<p>Ambient air quality monitoring program continued during 2018. Data was collected from two air quality sampling stations: one to the east of the site on Gallinger Road and one to the south of the site near the beginning of the Highway 600 reroute on Gallinger Road. These stations are equipped with hi- samplers (brush motor and mass flow controlled), PQ200 samplers, samplers, and passive sampling for SO2 and NO2. The hi-samplers measure Total Suspended Particulate (TSP) and metal concentrations averaged over a 24-hour period. The metals</p>	Ongoing

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	<p>operation and active reclamation project phases. Select filter samples will be assessed for metals (full metal scan and including mercury, arsenic, cadmium and lead). Two monitoring stations will be set up at the approximate property boundary locations shown in Figure 13-1 subject to power availability and location specific constraints. Equipment siting, operations, auditing and reporting will following all appropriate MOE requirements as provided in the Operations Manual for Air Quality Monitoring in Ontario (MOE 2008).</p>	<p>and metalloids analyzed include arsenic (As), cadmium (Cd), chromium (Cr), cobalt (Co), copper (Cu), iron (Fe), lead (Pb), manganese (Mn), nickel (Ni), selenium (Se), vanadium (V), and zinc (Zn). The PQ200 samplers measure Particulate Matter 2.5 (PM2.5) concentrations averaged over a 24-hour period. The dustfall samplers measure total deposition over a 30-day period. Passive sampling measures SO2 and NO2 concentrations over a 30-day period. There were two of TSP and metalloids AAQC limits exceedances measured at the Gallinger Road station. Both were attributed to increased light vehicle traffic along Gallinger Road. Mitigation measures included restricting light vehicle traffic and applying calcium chloride to act as a road dust suppressant. The Fugitive Dust Control Plan will be reviewed in and updated in 2019.</p>	
13.3.2	<p>Subject to consultation and support from area residents and the regulatory agencies, RRR plans to measure sound levels at (or near) residences positioned around the RRM site (Figure 13-1). These would include:</p> <ul style="list-style-type: none"> • One residence to the south of the mine site in Black Hawk; • One residence to the east of the mine site on Gallinger Road; • One residence to the southeast of the mine site on south Gallinger Road; • One residence to the west of the mine site in Dearlock; and • One residence to the northwest of the mine site on Highway 600. <p>A dedicated remote monitoring system may be used to provide a real time access system. All sound monitors will conform to MOE NPC-103 measurement protocols. As per MOE protocols, sound level measurements are to be</p>	<p>Sound was measured at the listed locations (residences) during May and June of 2018 and as related to ESA permit requirements. No project related noise exceedances were recorded in 2018. A dedicated remote monitoring system was not established during 2018.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>taken at each measurement location. Hourly Leq, L10, L90 and Lmax will be recorded. Audio samples based on trigger levels will also be recorded. Trigger levels, with automated alerts will be developed for addressing exceedances.</p>		
13.4.2	<p>In addition, RRR will carry out the following geochemical monitoring program:</p> <ul style="list-style-type: none"> • As part of the ongoing mine rock management plan, collect and analyze blast hole drill cuttings for analysis of total inorganic carbon and total Sulphur, using a Leco furnace, as a means of segregating PAG and NPAG materials for optimal management of PAG mine rock; • Submit a subset of Leco furnace samples, collected as part of the ongoing mine rock management plan, for acid base accounting static testing and metals analysis; • Collect and analyze mill composite tailings samples, on an approximate monthly basis, for acid base accounting static testing and metals analysis; and • Conduct additional geochemical testing on an as required basis to provide further information on Project specific aspects, such as any conditions of note evolving out of developing trend analyses. 	<p>A Geochemical Monitoring Plan for the Construction and Operation Phases was issued in accordance with MECP ECA 5178-9TUPD9 requirements and was implemented in 2016. Monitoring continued through 2018 and included; analyzing blast hole drill cuttings using a Leco furnace and submission of a subset for ABA and metals analysis, per the commitment.</p>	Ongoing
13.5.2	<p>Collect and analyze samples, and measure rates of flow, as appropriate, from site discharges, and runoff and seepage collection facilities, at the start of their respective operations, including:</p> <ul style="list-style-type: none"> • TMA discharges to the Pinewood River both directly by pipeline discharge and 	<p>A monitoring program was put in place during 2015 and continues to be in place. During 2018, surface water was monitored on and off site as per the Surface Water monitoring program.</p> <p>All effluent discharges in 2018 met the environmental requirements.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>through the constructed wetland;</p> <ul style="list-style-type: none"> • Sedimentation Pond #1 and #2 discharges to West Creek; • Aggregate operation(s), discharges (if any); • Sewage effluent discharge; and • Runoff and seepage collected from site operations areas (TMA, overburden and mine rock stockpiles, plant site area and haul roads) in accordance with MDMER and Environmental Compliance Approval requirements. 		
13.5.2 B	<p>For each of the above, where there is a discharge to a receiver (West Creek or Pinewood River) monitor on a monthly basis (commencing at least three months before the first anticipated discharge / release) the quality of waters upstream and downstream of discharge and runoff / seepage releases at proposed monitoring locations shown in Figure 13-2, inclusive of three stations on West Creek and five stations on the Pinewood River (including Pinewood River baseline monitoring stations SW10, SW3 and SW15. The two current baseline monitoring stations on the Rainy River (SW16 and SW17) would also be maintained for monthly monitoring. Quarterly samples from selected water quality sampling stations will be collected for trace analysis of total and methyl mercury in discussion with the MOE.</p>	<p>The receiver monitoring was conducted on a monthly and quarterly basis as per the commitment. All samples collected from the receivers met the environmental approval requirements. In 2018, total and methyl mercury samples were collected during the open water period in the Pinewood River upstream and downstream of the site.</p>	Ongoing
13.5.2 C.	<p>Monitor flows as shown in Figure 13-2 commencing as soon as construction is completed on the West Creek pond and the West Creek diversion at:</p>	<p>Construction of the West Creek Diversion was completed in 2017, however dry conditions that persisted through 2017 and 2018 were not conducive to installation of water level transducers in the absence of water flow. A water level transducer was</p>	Ongoing

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	<ul style="list-style-type: none"> • West Creek at the West Creek pond outflow • West Creek diversion; and • Pinewood River at Highway 617 (Water Survey of Canada Station WSC 05PC023). <p>Flows are already being measured for the Pinewood River at WSC Station 05PC023. Note that given the importance of the WSC station to overall site water management as per Section 4.12, RRR will need to enter into an agreement with WSC to ensure that the station will be maintained throughout the RRM mine life, and that data will be made available to RRR on a daily basis, and that RRR would be immediately informed of any maintenance activities which could influence its operations.</p>	<p>installed in the West Creek Pond in April 2018. The WSC 05PC023 hydrometric station remains active, however New Gold installed a dedicated hydrometric station on the Pinewood River in late 2015 to supplement this data source and continued to monitor the station through 2018.</p>	
13.5.2 D.	<p>As data availability permits, develop annual updated statistical flow estimates for local watercourses based on flow data derived through monitoring, with such estimates to include:</p> <ul style="list-style-type: none"> • Monthly averages • Annual averages • Extreme low flow statistics corresponding to 2, 5, 10 and 20 year return period conditions; and • Extreme high flow statistics corresponding to 2, 5, 10 and 20 year return period conditions. 	<p>In-stream measurements were ongoing during 2018 in the Pinewood River. A flow measurement was conducted in the West Creek Diversion in July 2018, the measurement confirmed that flows were extremely low or absent. Continued in-stream flow monitoring is planned for 2019.</p>	Ongoing
13.5.2 E.	<p>Carry out an environmental effect monitoring (EEM) program in accordance with the Metal Mining Guidance Document for Aquatic Environmental Effects Monitoring (EC 2012d) to assess the character and quality of aquatic resources</p>	<p>The Cycle 1 EEM Study Design Report was prepared for submission in 2016, the subsequent Cycle 1 biological monitoring was conducted in 2017. The cycle 1 Interpretive Report was submitted to EC by March 31, 2018. Timing of Cycle 2 EEM studies is scheduled for 2020. A copy of the Interpretive Report can be found under supporting documents.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>at the following locations:</p> <ul style="list-style-type: none"> • West Creek diversion; and • Pinewood River upstream and downstream of the RRM site area. 		
13.5.2 F.	<p>Except as provided for in Item E, above, carry out commencing one year after the date of commercial production and at three year intervals thereafter, fish habitat and fisheries assessments, including sediment and benthos investigations for:</p> <ul style="list-style-type: none"> • West Creek; • Clark Creek (upstream of the east mine rock stockpile); and • Pinewood River. <p>Monitor contaminants of potential concern in fish tissues from game fish harvested from the Pinewood River coincident with monitoring carried out pursuant to Item F, above.</p>	<p>Fish tissue monitoring (liver, ovary and muscle tissue) of walleye and northern pike game fish from the Pinewood River has taken place every year since the fall of 2015. Yearly study results are compared to baseline data collected in 2012. During 2018, the annual 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.</p> <p>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.</p> <p>A copy of the 2018 Fish Quality Monitoring Report can be found in Appendix G.</p>	Ongoing
13.5.2 H	<p>As a component of the RRM stormwater management plan, collect and analyze late winter snow pack samples for pH and metals to help determine the effects of dust fall accumulated within the snow pack during spring melt.</p>	<p>Winter snow was measured as part of the surface water monitoring program with runoff being collected onsite for processing of ore and was sampled and tested prior to any releases to environment in 2018. Passive dust fall monitoring was also active during 2018. Snow pack samples are scheduled for early March 2019. The crusher on the plant site was not active until late summer/fall of 2017.</p>	Ongoing

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13.6.2	<p>RRR will carry out groundwater system monitoring as per the following:</p> <p>A. Collect and analyze samples, and measure pumping rates for mine water from the open pit and underground transferred to the mine rock pond (or to the TMA during construction);</p> <p>B. Establish a groundwater well (piezometer) network around the open pit area to monitor groundwater levels throughout the area on a continuous basis using water level transducers, with transducer downloads to be completed twice per year, commencing at least six months prior to the start of pumping, all as shown in Figure 13-3;</p> <p>C. Collect groundwater samples from the groundwater well / piezometer network quarterly except where prevented by freezing conditions, and analyze the samples for applicable parameters as provided for in Provincial approvals; and</p> <p>D. Review groundwater monitoring data annually and update the groundwater model on three year intervals, with the first such update to be based on data obtained from the first three full years of pumping; and with the model updates to be completed within nine months of the end of the data collection period.</p>	<p>A) Samples are collected and analyzed prior to discharge, and pump rates are measured during discharge, for the mine water pumped from the open pit treatment sumps to the environment.</p> <p>B) A groundwater well program has been established that extends around the mine footprint, sampling began in early 2016. Selected piezometers / wells include water level transducers, with downloads completed quarterly in conjunction with sample collection and manual water level measurements. In 2018, water level measurements continued for the remaining mine dewatering wells established around the periphery of the open pit in 2017.</p> <p>C) Groundwater well samples were taken from the piezometer / well network quarterly during 2018, however some wells were not sampled due to required repairs or frozen conditions in the first and fourth quarters.</p> <p>D) The groundwater samples were analyzed for the parameters in the Provincial approvals, and the data was reviewed during 2018. The groundwater model was updated in 2018, with the next scheduled update for 2021.</p>	Ongoing
13.7.1	A wildlife monitoring plan will be implemented to ensure that effects on wildlife are properly mitigated. FMP	The comprehensive Wildlife Monitoring Plan was issued May 25, 2016 (Version 5) and followed during 2018.	May 25, 2016

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	<p>monitoring will be based where possible, on standard survey protocols used during baseline studies so that any changes in local mammal, area-sensitive breeding bird or amphibian populations may be detected.</p>		
13.7.2	<p>Methods for determining adverse RRM-induced effects on mammals following the implementation of proposed mitigation measures will include:</p> <ul style="list-style-type: none"> • Bat acoustic monitoring at representative locations; • Aerial helicopter survey in late winter to document numbers and distributions of White-tailed Deer, Moose and Wolves at locations representing suitable habitat directly adjacent to the RRM site; and control sites. Such surveys to be conducted during the first winter of the construction phase, the winter following the completion of construction, and at three year intervals thereafter until the end of the active mine reclamation phase; • Working with any Aboriginal hunters to document White-tailed Deer, Moose, Wolf and Black Bear harvesting activities in the RRM site area; • Implementation of a wildlife log (including collisions) of general mammal observations made by employees on the RRM site including White-tailed Deer, Moose, Black Bear and any other larger furbearers; and • Monitoring of Black Bear activity related to waste 	<p>In 2017 MNRF has requested that the aerial helicopter study be aligned with their regional monitoring. Due to limited snow pack in 2018, aerial surveys did not take place. The MNRF aerial surveys are to take place in January and/or February 2019 and will cover the District with transect lines spread out much wider than just the RRM.</p> <p>Bat acoustic monitoring was completed during 2018. During baseline monitoring prior to the commencement of construction it was concluded that no suitable bat habitat existed within the area of tree clearing for project development.</p> <p>New Gold RRM implemented a wildlife log at the site during 2015 and continued documenting wildlife sightings and interactions through 2018. In 2016 the Environmental Department started tracking sightings in a GIS database. The wildlife logs for 2018 include documented Black Bear activity. New Gold has been sending staff to receive training from the Ministry of Natural Resources and Forestry on how to live trap and relocate nuisance black bears.</p>	Ongoing

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	disposal (if applicable) and general site activities.		
13.7.3	<p>Methods for determining adverse effects to breeding birds following the implementation of proposed mitigation measures will include:</p> <ul style="list-style-type: none"> • Targeted point count surveys for diurnal SAR including Golden-winged Warbler, Barn Swallow and Bobolink and for woodland area-sensitive breeding birds in suitable habitat. Point counts will be based on standardized survey protocols described for the Ontario Breeding Bird Atlas Guide for Participants (OBBA 2001) so as to be consistent with baselines study methodology (Section 5.2.12); • Incidental data collection for SAR and Provincially rare species which are currently present at lower abundance including: Canada Warbler, Olive-sided Flycatcher, Short-eared Owl, American Pelican, Bald Eagle and Black-billed Magpie; • Targeted twilight surveys for Eastern Whip-poor-will in suitable habitat. Whip-poor-will monitoring efforts will follow standardized survey protocols as outlined in the whip-poor-will Roadside Survey Participant's Guide (BSC 2012); • Concurrent data collection for Common Nighthawk to be undertaken during targeted Eastern Whip-poor-will surveys as described above as no standardized survey protocols have been developed specifically for this 	<p>On an annual basis New Gold retains the expertise of a consulting firm to conduct bird surveys which fill the requirements of this condition.</p> <p>To support the monitoring of bird species onsite the Environmental Department implemented a site wide protocol for reporting wildlife in 2015. Through this system the following bird sightings were reported in 2018; 89 bobolink, 71 barn swallow, 5 eagle, 22 pelicans and 31 swans. Education and awareness of the reporting procedure and onsite Species at Risk is conducted through new employee/contractor orientation, site wide radio communication and publications.</p> <p>Monitoring on the 2 known eagles' nest near the project boundary is monitored each year through visual observation.</p> <p>In 2015 prior to the breeding bird window New Gold staff installed four barn swallow nesting boxes in open fields (ESA lands) to offset the loss of habitat on the mine site caused by the removal of old buildings. Each year these boxes are monitored through the breeding bird window for use. In 2018 there was no activity at any of the four locations.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>species;</p> <ul style="list-style-type: none"> • Annual monitoring of active Bald Eagle nests which occur in close proximity the RRM site. Monitoring will attempt to establish fledging success; • Implementation of a wildlife log of general breeding bird observations at the RRM site by employees (focused on raptors and raptor nests, and SAR species); and • Any additional monitoring defined in ESA permits. 		
13.8.2	<p>This section considers the potential for traffic accidents on public roads related to the construction and operation of the RRM. Roads of specific interest are:</p> <ul style="list-style-type: none"> • Highways 71 and 11, west of Fort Frances and south of Kenora; • Highway 600; • Teeple Road west of Highway 71; and • East Access Road. <p>Methods for assessing traffic accidents along public roads will include:</p> <ul style="list-style-type: none"> • Monitoring road surface conditions for the identified roads of interest during the winter months and working with the MTO (MTO) and the local municipalities, to ensure that roads are properly cleared, salted and sanded, as appropriate to maintain safe driving conditions; • Maintaining a record of any accidents involving RRR employees and contractors related to the RRM; and • Maintaining a record of any near misses related to potential traffic accidents along the roads of interest involving RRR employees 	<p>New Gold employees and on-site contractors are required to report all near misses and traffic accidents immediately to the New Gold safety department. A record documenting system is in place. In some instances, drug and alcohol testing may be required and can be conducted on site by trained staff.</p> <p>New Gold has a zero-tolerance policy in place for any employees or contractors caught driving while using a cell phone. There are also policies in place to control speeding on site.</p> <p>Security conduct road inspections on site each night shift. These inspections include Teeple Road, East Access Road and Highway 600. If hazards are identified on roads owned and maintained by New Gold they are addressed by an onsite construction team. Hazards identified on municipal or public roads are reported to the appropriate authority (Municipality or MTO).</p> <p>Reports of road hazards are communicated during the HSE Communication broadcast over all radio channels at shift start.</p> <p>Dedicated Security coordinator hired in October 2018 to put more emphasis on security aspects of our operations, including traffic control</p>	Ongoing

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	and contractors related to the RRM.		
13.9.2	<p>To assess potential changes to TLU that could potentially derive from implementation of the RRM, RRR will carry out, or provide financial support for, the following activities:</p> <ul style="list-style-type: none"> • Subject to any terms of agreement with the local First Nations and Métis, periodically update Traditional Knowledge (TK) studies conducted for the RRM beginning five years after mine operations initiate, to determine if there have been any changes to resource harvesting patterns by local Aboriginal peoples as a result of the RRM, and the reasons for any such changes • Conduct reviews at five year intervals, of the activities of a subset of RRR Aboriginal employees (representative cross section) to determine the effects of employment on their traditional activities • Confirm any expected changes in the availability of fisheries and wildlife resources to local harvesters, based on data derived from biological monitoring programs. 	No updates were conducted in 2018.	Ongoing
13.10.2	<p>RRR will carry out the following monitoring program to ensure the protection of cultural heritage resources</p> <ul style="list-style-type: none"> • Maintain a record of all cultural heritage resources known to occur in the vicinity of planned RRM developments, such that intrusion or damage to such resources can be avoided during construction, recognizing and respecting confidentiality limitations • Maintain an active dialogue 	<p>NG engaged qualified Archaeologists and Built Heritage Specialists to record all resources prior to construction commencing. NG continues to actively engage local residents and Indigenous groups through meetings and visits.</p> <p>Woodland Heritage Services conducted Stage 4 archaeology in 2018. NG agrees to enlist the services of Elders should Cultural Heritage resources be discovered. NG contracted post construction assessment of known Cultural Heritage sites in 2018 with reporting expected to be completed in 2019.</p>	Ongoing

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	<p>with local residents and Aboriginal group representatives, having knowledge of specific areas prior to and during major construction activities, to provide guidance to supervisory staff on the likely or possible occurrence of as yet undocumented cultural heritage sites</p> <ul style="list-style-type: none"> • Enlist the services of a trained archaeologist during the conduct of major construction works to support RRR as needed, where there is a reasonable potential for encountering as yet undocumented cultural heritage sites • Enlist the services of Elders or other cultural advisors in the event that cultural heritage resources are encountered (in addition to meeting all Regulatory requirements) • Conduct a post-construction assessment of the state of known cultural heritage sites in the vicinity of RRM activities / structures to confirm the integrity of such resources. 		
13.11.2	<p>RRR will carry out the following monitoring program to ensure the documentation of cultural heritage landscapes and built heritage resources as appropriate:</p> <ul style="list-style-type: none"> • Develop an initial record of all cultural heritage landscapes and built heritage resources known to occur near the planned RRM developments, such that intrusion or damage to such resources can be documented; and • Conduct a post-construction assessment of the state of known cultural heritage landscapes and built heritage resources in the vicinity of 	<p>The initial record was completed by Untermann and McPhail. Untermann and McPhail began a post-construction assessment of the state of known cultural heritage resources in 2018 with completion anticipated in 2019.</p>	Ongoing

Condition/ Tracking #	Description	Status 2018	Date Completed
	<p>RRM activities / structures to confirm the status of such resources.</p>		
13.12.2	<p>Traffic flow on local roads with more limited capacity is of greater interest, notably:</p> <ul style="list-style-type: none"> • Highway 600; • Teeple Road west of Highway 71; and • The East Access Road. <p>The intent is to document that these local roads are able to continue to function adequately, and within safe limits for both project and local traffic. Methods for measuring traffic use along local roads will include:</p> <ul style="list-style-type: none"> • Periodic traffic count surveys using automated traffic counters; • Employee surveys to determine transport routes to and from the mine site; and • Ongoing discussions with MTO and the Township of Chapple to support additional traffic volume monitoring studies if appropriate. 	<p>The Ontario Provincial Police request that New Gold share any traffic complaints with them. New Gold continues to monitor traffic and work closely with the Township of Chapple to address any concerns. The East Access Road (Korpi Road) is the primary route of traffic to the mine site, greatly reducing traffic on Teeple Rd/Hwy 600. New Gold also provides bus transportation for employees to/from Fort Frances, Barwick, Stratton, Rainy River and Emo.</p>	Ongoing
13.13.2	<p>Methods for documenting accommodations use in association with the RRM will include conducting contractor and employee surveys to determine:</p> <ul style="list-style-type: none"> • Community or nearest community of local residence; • Type of residence (rental or ownership); • Type of accommodation (existing or new); • Type of occupancy (single, shared or family); and • Whether or not the employee / contractor is an existing local resident, or new to the area. 	<p>New Gold RRM is a residential operation.</p> <p>As of December 31, 2018, 73% of New Gold employees were from the local human environment regional study area. New Gold provides accommodation for contractors on the site and a limited number of professional staff when local hiring is not possible.</p>	Ongoing

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13.14 A	<p>It is anticipated the environmental management system will consider the following areas as significant environmental aspects of the RRM (although they may not be represented by individual management plans depending on the final environmental management system framework):</p> <ul style="list-style-type: none"> • Recycling and waste reduction program; • Mine rock (PAG / NPAG) management; • Water management; • General waste management; • Hazardous materials management; • Fuel handling and storage; • Fugitive dust management; • Sound management; • Wildlife management; • Traffic management; • Cultural awareness; • Heritage management; • Emergency response; and • Response to malfunctions and accidents. 	<p>In 2018, the design of an ISO 14001 compliant Environmental Management System (EMS) was completed for the RRM.</p> <p>The EMS design framework does include the following areas as significant environmental aspects and are either stand alone Management Plans or a subset to a core Management Plan:</p> <ul style="list-style-type: none"> Recycling and waste reduction program Mine rock (PAG / NPAG) management Water management General waste management Hazardous materials management Fuel handling and storage Fugitive dust management Sound management Wildlife management Traffic management Cultural awareness Heritage management Emergency response Response to malfunctions and accidents 	Ongoing
13.14 B	<p>Environmental management system maintenance and effectiveness will be monitored through a variety of programs, such as:</p> <ul style="list-style-type: none"> • Formal and informal audits; • Environmental monitoring; • Non-conformance incidents, status of corrective actions; and • Stakeholder feedback. <p>Periodic management reviews will be completed to consider changing circumstances which could affect the continued suitability and adequacy of the plans, and to support continual improvement in overall effectiveness.</p>	<p>In 2018, the design of an ISO 14001 compliant Environmental Management System (EMS) was initiated for the RRM (RRM).</p> <p>Included in the design framework of the EMS, maintenance and effectiveness will be monitored through audits, environmental monitoring, non-conformance incidents, status of corrective actions and stakeholder feedback.</p> <p>Periodic management reviews will support continuous improvement.</p>	Ongoing