

SECTION 5

NEW GOLD RAINY RIVER MINE COMMITMENT REGISTRY



Figure 20 Striped hairstreak butterfly on thistle at Pinewood

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Condition/ Tracking #	Description	Status 2019	Date Completed
1	The RRM (RRM) will monitor and mitigate air emissions, particularly dust, through implementation of current industry best management practices.	<p>Ambient air quality monitoring program continued in 2019 with monitoring of relevant air emissions parameters stipulated in the Rainy River Project Ambient Air Quality Monitoring Plan in compliance of ECA 0412-A2LR4V condition 10.1 (a) i Ambient Air Quality Monitoring Plan. Ambient air quality data continued to be collected at the two air quality monitoring stations located east (Gallinger Road) and south-east (Tait Road) of the mine site by New Gold Environment staff.</p> <p>Analytical data was provided by certified external laboratories. New Gold Rainy River Environmental staff interpreted the data and prepared 4 quarterly reports. Before submission, quarterly reports were submitted for external review by an independent consultant.</p> <p>During 2019, there were two exceedances of total dustfall and one exceedance of total suspended particulates (TSP). All exceedances occurred at the Gallinger Road (East) ambient air quality monitoring station. Both June and July total dustfall exceedances were caused by dead insects that had fallen into the dustfall jars. Technician error during filter change was responsible for the October 30 total suspended particulates (TSP) exceedance.</p> <p>As per section 2.7 of the MECP Air Facility inspection report, a 2019 updated copy of the Fugitive Dust Best Management Practices Plan (BMP) for operations was submitted to MECP for review in April of 2019. 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. During 2019, dust emissions were controlled by: production drills equipped with dust curtains and water dispersion during operations.</p>	<p>Air Quality Stations installed May 2015</p> <p>Monitoring is ongoing for life of mine.</p>

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		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. Calcium chloride dust suppression was sprayed onto light vehicle access roads in June of 2019. In addition, NG applied calcium chloride on frequently used roads such as Gallinger and highway 600 between the camp and Highway 71. Water trucks equipped with spray bars continued to water all major haul roads in and out of the open pit and on all roads in and around infrastructure construction. The primary crusher utilized a chemical suppression compound during stockpiling.	
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 2019 Fugitive Dust Best Management Practices Plan for RRM operations phase was prepared and submitted to the MECF as per section 2.7 of the December 2018 Air Inspection Report.</p> <p>This plan supersedes the 2018 updates and identifies fugitive emission sources, composition and characterization of particulate emissions, fugitive dust control for each source, implementation and operation plus inspection and maintenance procedures.</p> <p>RRM activities continued to follow the 2016 plan for construction while using updated data collection forms from the 2018 plan updates. Paper and electronic records for dust suppression methods were collected and stored during 2019. Appendix I.</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>	Continued in 2019

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3	Sound will be monitored during construction, operations and active closure phases consistent with Ministry of the Environment (MOE) requirements	<p>During June of 2019, an acoustic audit including noise monitoring was conducted on the RRM mine site. Sound pressure levels were measured per MECP Publication NPC-103 using a Larson Davis SoundExpert LxT sound level meter, with a PRMLXT1L preamplifier and a 377B20 Type 1 removable microphone. One 3.5-inch WS001 wind screen was used over the microphone for all measurements. For steady sound measurements, the meter was set to slow response and A-weighting. A Larson Davis CAL200 acoustical calibrator was used to calibrate the sound meter at the start and end of the measurement program.</p> <p>To assess the noise impacts associated with the TMA construction activities, confirmatory daytime measurements were collected in the vicinity of a house located northwest the TMA. Measurements were collected from the Old Highway 600, near the entrance to the house. The measured sound level and the MECP exclusionary sound level limits demonstrate that during June of 2019, the TMA construction activities were elevated above the applicable MECP sound level criteria. Noise measurements indicated that site noise level limits are above the applicable criteria when construction activities are proximal to receptors. Construction activities are short term in duration and not significant when considered on a long term basis.</p> <p>During 2019, additional sound monitoring was not conducted in two different Species at Risk habitat areas as per permit. This activity will be performed in habitat areas during Q2 to Q3 of 2020.</p>	Annual onsite sound level monitoring conducted September 27 to 29, 2017.
4	NG (NG; previously Rainy River Resources) expect that the monitoring required will include: total suspended particulate (TSP) and metals on the TSP size fraction, PM10, dustfall and passive monitoring for NO2 and SO2. NG commits to conducting this monitoring which is also	During 2019, ambient air quality monitoring continued at two ambient air quality stations located along the eastern and southern-eastern boundaries of the mine site. The 2019 ambient air quality monitoring program strictly follows the Ambient Air Monitoring Program Plan approved by MECP in 2016. Since the installation of the stations, the MECP has conducted 3 inspections: in 2015, 2016 and 2019. There were no significant deficiencies	Continued in 2019.

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	expected to be an approval requirement.	identified during each inspection. Monitoring ambient air quality parameters including total suspended particulates (TSP) including metals and metalloids, particulate material less than 2.5 microns (PM _{2.5}), monthly total dustfall, passive nitrous dioxide (NO ₂) and Sulphur dioxide (SO ₂) measurements during 2019. Quarterly reporting of data was compared to Provincial standards during 2019 as per plan and ECA requirement. Ambient Air Quality Plan submitted February 2016 and approved by MOECC in 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 April of 2019, an updated copy of the Fugitive Dust Best Management Practices Plan (FDBMPP) for operations was submitted to the MECP for review in response to a December 2018 air inspection which stated that more effort to mitigate fugitive dust was required. ECA Application Submission – November 14, 2014; Fugitive Dust Best Management Plants submitted to MOECC February 4, 2016; Updated Water Use Plan for dust submitted to MOEC Dec 14, 2016.	Continued in 2019.
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	Planning measures aimed at reducing fuel and power consumption for the RRM site include the following: • Using larger, more fuel efficient trucks for material transport;	All new equipment in 2019 is TIER 4 emission compliant. Permanent buildings for Maintenance, Warehouse etc. have been replaced with tent type structures so energy reduction will not be as originally expected.	Continued in 2019.

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	<ul style="list-style-type: none"> • Using optimum insulation in buildings to reduce heat loss and heat recovery from equipment where practical; and • Maintaining site equipment and vehicles in good working order through regular preventative maintenance. 	All other strategies remain the same.	
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 2019. New Gold Environmental staff continued to collect data from the two air quality sampling stations as per the Ambient Air Quality Monitoring Plan. Sampling stations are located to the southeast of the site at Tait Road and Highway 600, and east of the site along Gallinger Road. During 2019, there were two exceedances of total dustfall and one exceedance of total suspended particulates (TSP) at the Gallinger Road station. Total dustfall exceedances were caused by dead insects that had fallen into the dustfall jars. Technician error during filter change was responsible for the October 30 total suspended particulates (TSP) exceedance.</p> <p>Air Quality Monitoring Reports for each quarter of 2019 can be found in the supporting documentation.</p>	Continued in 2019.
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 2019 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 (can muffle sound). - Reducing size of blasts where appropriate and scheduling those blast only at 1100 hours and 1500 hours. - Tree buffers maintained where practical. - Annually the acoustic model is updated, and no significant change has been detected. 	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 June of 2019, an acoustic audit including noise monitoring was conducted on the RRM mine site. Sound pressure levels were measured per MECP Publication NPC-103 using a Larson Davis Sound Expert LxT sound level meter, with a PRMLXT1L preamplifier and a 377B20 Type 1 removable microphone. One 3.5-inch WS001 wind screen was used over the microphone for all measurements. For steady sound measurements, the meter was set to slow response and A-weighting. A Larson Davis CAL200 acoustical calibrator was used to calibrate the sound meter at the start and end of the measurement program.</p> <p>To assess the noise impacts associated with the TMA construction activities, confirmatory daytime measurements were collected in the vicinity of a house located northwest the TMA. Measurements were collected from the Old Highway 600, near the entrance to the house. The measured sound level and the MECP exclusionary sound level limits demonstrate that during June of 2019, the TMA construction activities were elevated above the applicable MECP sound level criteria.</p> <p>Noise measurements indicated that site noise level limits are above the applicable criteria when construction activities are proximal to receptors. Construction activities are short term in duration and not significant when considered on a long-term basis</p>	Continued in 2019.
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.	For the 5.5 - 6 3/4 inch drill patterns the design has 3 holes (199kg each) blasting in close proximity (within 8m of each other). For the 9 inch drill pattern, the design has 2 holes on average blasting (330kg each) in close proximity. Therefore, our average MIC can be estimated at 597-660kg per shot.	Continued in 2019.

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12	<p>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>	<p>Through regular communication, New Gold has established positive relationships with neighbours who are closest to the project mine site. When neighbours have any concerns or comments, they contact the Community Coordinator or Community Supervisor directly, who then ensures follow-up and closeout. In 2019, neighbours joined the New Gold team for a site visit and lunch at the accommodation facility. In 2019, there were no issues from blasts (noise or vibration) or road dust. Dust abatement treatment was applied on roads frequently used by NG including Korpi, Galinger, Highway 600 from the camp, and Teeple Road. There was one complaint of excess road traffic on Off Lake Road; employees were reminded to use Hwy 11/71 and the issue was resolved to the resident's satisfaction.</p> <p>The additional communities have been added as of May 14th, 2020. They receive will be receiving spill report as well as incident reports.</p>	Ongoing
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, 	<p>During 2019 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 ions. The cyanate ions reacted with water to form ammonia and carbon dioxide. Free metal ions were precipitated with the addition of lime to form insoluble metal hydroxides and absorbed onto tailings particle solids, settling out of the slurry in the tailings management area. Excess SO₂ was used in the process to ensure complete stoichiometric oxidation of cyanide. In 2019, construction of the Tailings Management Area (TMA) lift on North and West Dams was completed.</p> <p>Treated tailings are continuously pumped from the mill through the tailings pipeline into TMA. The water treatment train including a water treatment plant, biological reactor #1 and three nitrification cells was completed in 2019. Constructed of biological reactor #2 and overflow pond began in late fall of 2019 with completion scheduled for early 2020. Effluent discharge line #1 and diffuser was completed</p>	Continued in 2019.

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	<p>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;</p> <ul style="list-style-type: none"> • Use of emulsion and/or emulsion blend explosives as a means of limiting ammonia residuals from the use of blasting agents at source; and • Collection of site runoff and seepage as per MMER (MMER), and to maximize the use of near 100% contact water recycle for the processing plant water supply. 	<p>near the Pinewood River pumphouse. Effluent discharge line #2 and diffuser will be constructed in summer of 2020 near confluence of Loslo Creek with Pinewood River. Sediment Pond #3 construction began in summer of 2019. Completion is scheduled for 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 began with the Tait Quarry area and will continue as discussed in the Rainy River Closure Plan Amendment (March 2020).</p> <p>Drainage from low grade and east mine rock PAG stockpiles continues to report into the Mine Rock Pond via a drainage ditch surrounding the East Mine Rock Stockpile area which was completed in 2019. Recycling of water from the Mine Rock Pond for re-use in the mill process water supply continued during 2019.</p> <p>The current drilling and blasting contractor on site, Dyno Nobel, continued to use a straight emulsion for all blasting in 2019.</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. Effluent discharges to the environment from ECA compliant water retained in on-site holding ponds, took place in the fall of 2019.</p>	

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14	Surface water runoff will be diverted from entering the pit or flowing through stockpiles by ditching or other means.	<p>During 2019, surface water was diverted from the stockpiles and the open pit with a combination of permanent and temporary ditching and sumps.</p> <p>With Sediment Ponds 1 and 2 in place, and Sediment Pond 3 nearing completion with all associated ditching, West Mine Rock Stockpile has nearly all permanent water management systems operating.</p> <p>East Mine Rock Stockpile had all the permanent ditching completed in 2019 sending all water to the Mine Rock Pond. Phase 2 of the open pit has expanded in the general north direction with temporary ditches developed throughout 2019 to collect surface water from the West Creek remnant channels. The water is pumped to either the Plant Site water management structures or Mine Rock Pond and used in ore processing.</p> <p>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, or 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
15	Open pit dewatering water will be contained and if necessary, treated before it is discharged to the environment.	<p>The open pit has expanded in the north and south direction with a temporary a series of ditches developed to prevent water from entering the pit. The water is pumped to either the Plant Site water management structures or Mine Rock Pond 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</p>	Continued in 2019.

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		sumps reroute the water to Mine Rock Pond for ore processing.	
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.	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.	Not applicable in 2019.
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.	Completed.
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.	Not applicable in 2019.
19	Should it be determined that future treatment is needed for stockpile runoff / seepage and overflow from the pit at closure, passive treatment options would be fully considered during the detailed design stage.	Pump back systems have been installed for Sediment Ponds 1 and 2. Interim ditching collects water and a water treatment system has been constructed. In 2019, Sediment Pond 3 was built.	Continued in 2019.

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20	Ditches (and ponds as appropriate), will be established around the stockpiles to collect and manage runoff. Diversions will be sized to convey the environmental design flood. All sedimentation ponds will be designed with a retention period to meet the MMER discharge requirement for total suspended solids. The design criteria for perimeter ditching in this area (east mine rock stockpile and low grade ore stockpile) has been increased to the 100-year return period condition, as these stockpiles will contain PAG materials.	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 occurred in the fall of 2019.	Continued in 2019.
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 continue to be used in 2017. The construction of the permanent Sediment Ponds 1 and 2 was completed and commissioned in 2018.	Completed 2018
22	PAG mine rock (and ore) will be managed, with drainage from the PAG mine rock and ore stockpile reporting to the mine rock pond, for re-use as part of the process plant water supply.	The Mine Rock Pond (MRP) was commissioned in December of 2017 and is being operated as per commitments.	December 2017

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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 2019. Periodic sampling of till is ongoing during open pit stripping of till. Results have been in line with the initial interpretations.</p>	Continued in 2019.

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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 MNDM later in 2014. It will also be provided to EC per their request. The plan will be revised during operations if necessary to ensure it remains current and as part of future Closure Plan amendments.</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 MECP ECA 5178-9TUPD9 requirements and has been implemented at the RRM site. Monitoring was ongoing during 2019. A field capping trial was commissioned in 2017.</p>	Continued in 2019.

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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 2019 has either been stockpiled in the East Mine Rock Stockpile, used in the pit (for road building and padding in the overburden) and used for dam wall construction in the Tailings Management Area.	Continued in 2019.
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 2019, 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 West Mine Rock and East Mine Rock Stockpiles. A portion of the lower bench of East Mine Rock Stockpile is planned to begin the reclamation process in 2020. A vegetation cover test plot was set up in 2019 with continued monitoring of a mine rock cover treatment system that was set up in 2018.	Not applicable in 2019.
27	Encapsulation of the east mine rock stockpile under a multi-layered cover is proposed with a long-term goal of controlling ARD.	In October 2017 New Gold submitted an amended Mine Closure Plan for the Rainy River Mine to the Ministry of Northern Development and Mines. The encapsulation of the East Mine Rock Stockpile under a multi cover is detailed in section 6.2.5. The process is scheduled to begin in 2020 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 and 2019, this multi cover system was monitored to ensure complete encapsulation was successful and a memo outlining the results in 2019 was prepared.	Not applicable in 2019.
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 	Continued in 2019.

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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 stockpile remain, section 9.14.1.4 of the Rainy River Project Closure Plan Amendment (October 2017) stipulates that it will be considered part of the East Mine Rock Stockpile and reclaimed in the same manner.	Not applicable in 2019.
30	Site runoff and seepage will be collected, managed and treated per the Provincial and MMER requirements.	<p>Site runoff and seepage are collected, managed and treated as per Provincial and Federal requirements.</p> <p>Water Management Pond and Tailings Management Area - Ditches and finger drains direct seepage and dam runoff to seepage collection ponds. Seepage collection ponds are pumped back to the TMA/WMP.</p> <p>West Mine Rock Stockpile - Ditches and drains direct seepage and dump runoff to Sediment Ponds #1 and #2, the Temporary Sediment Pond and Sumps 1 and 2 (to be replaced by Sediment Pond #3). Seepage and runoff treated in Sediment Ponds #1 and #2 that meet Provincial and Federal effluent limits is discharged to the environment.</p> <p>Open Pit - Sumps in catch benches, in-pit sumps and interception ditches, collect runoff and seepage from the open pit which is pumped to the Mine Rock Pond or Mill for use in processing ore.</p> <p>East Mine Rock Stockpile - Ditches and drains direct seepage and dump runoff to the Mine Rock Pond for use in processing ore.</p> <p>Process Plant Site - Ditches direct seepage and site runoff to the South and North Ponds. South and North Ponds are pumped to the Mill for use in ore processing.</p>	Continued in 2019.

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31	The overall site footprint and watershed capture will be minimized to the extent practical, so as to minimize the quantity of runoff and seepage requiring treatment and management.	This commitment was incorporated into the design of the Rainy River Mine.	Completed during design
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 in 2017. A water level transducer was installed in the West Creek Pond in April 2018. A hydrometric station was established in the West Creek Diversion box culvert, the H3 hydrometric station, in September 2019. A second hydrometric station, the H4 hydrometric station, is planned for Summer 2020 at another location in the West Creek Diversion, downstream of the Sediment Pond 1 final discharge to the West Creek Diversion.	Continued in 2019.
33	The West Creek pond will only contain natural, non-contact water. The West Creek diversion channel will be kept separate from the constructed wetland downstream of the TMA, so as not to mix the natural creek water with excess water discharged from the TMA.	The West Creek pond only contains non-contact water. The wetland construction will only occur near closure. At that time, appropriate measure will be implemented.	Continued in 2019.
34	West Creek Diversion will be positioned far enough from the pit perimeter to ensure integrity and stability and is expected to provide like-for-like fish habitat replacement.	The West Creek Diversion was completed and commissioned during 2017. It was designed and constructed to meet the requirements of this commitment including the implementation of fish habitat features.	Complete 2017
35	The West Creek diversion will be permanent, and there is no further consideration being given to diverting any flows from this creek into the open pit to help accelerate pit flooding at or following closure.	To date, the design of the mine is consistent with the requirements of this commitment. Please refer to commitment number 17.	Completed.

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36	There will be secondary containment in place for tailings and contact water pipelines at the crossing of West Creek.	In 2016, a secondary pipe and berm were installed around the Tailings and Water Management Pond Reclaim pipelines at every fish bearing waterbody crossing including West Creek. These remain in 2019.	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.	From January to April 2019, the primary water source for the process plant was the Water Management Pond, following this the primary sources were TMA Cell 2 and Mine Rock Pond. Process Plant was operated with 100% contact water throughout 2019.	Continued in 2019.
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.	No water was taken from the Pinewood River in 2019, Permit to Take Water 8776-9WQ2N3 expired on November 30, 2018.	Completed on November 30 2018
39	Water recycle will be maximized, using approximately 100% water recycle for the processing plant water supply.	From January to April 2019, the primary water source for the process plant was the Water Management Pond, following this the primary sources were TMA Cell 2 and Mine Rock Pond. Process Plant was operated with 100% contact water throughout 2019.	Continued in 2019.
40	Local area lakes will not be used for process water supply for the RRM.	From January to April 2019, the primary water source for the process plant was the Water Management Pond, following this the primary sources were TMA Cell 2 and Mine Rock Pond. Process Plant was operated with 100% contact water throughout 2019. No lake or river water was utilized.	Completed.
41	All process reagents and materials, and wastes, will be handled and stored responsibly,	During 2019 process reagents and materials were handled and stored according to supplier	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	according to supplier and safety guidance, regulatory requirements and industry best practices.	<p>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> <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>	

Condition/ Tracking #	Description	Status 2019	Date Completed
42	Any chemical spills within the process plant / chemical storage areas will be controlled through provision of secondary containment as appropriate and will not enter the environment. Spills of potentially hazardous materials during transport, or from on-site material storage and handling facilities will be managed. Measures will be taken to prevent and clean up any hydrocarbon spills (and other spills) at source to ensure such materials do not enter surrounding waters as practical. Spills will be reported to the MOECC and other appropriate agencies per the requirements of the Ontario Environmental Protection Act.	<p>During 2019, an MECP guidance document on environmental protection measures at chemical and waste storage facilities was implemented sitewide.</p> <p>Chemicals to be used in the process plant were moved into the mill, placed in covered cold storage areas or within bermed laydown areas to protect against spills to the environment.</p> <p>In 2019, 5 spills (project wide) were reported to the MECP as per requirements of the Ontario Environmental Protection Act. Letter reports communicating incident details, clean up and mitigation measures were provided to the MECP as per ECA 5178-9TUPD9 permit conditions. Event details are captured in a computer program called INControl. Each event is provided with a unique identifier which is used to capture spill information details, clean up tasks and assign accountability to responsible individuals. This system ensures that the spill is documented and cleaned up appropriately in a timely manner and reviewed by area owners before event is closed.</p>	Continued in 2019.
43	The TMA dams will meet strict regulatory requirements including the requirements of the Provincial Lakes and Rivers Improvement Act and will be constructed to withstand the probable maximum flood and maximum credible earthquake. A remedial action plan would be developed in consultation with appropriate government agencies in the event of dam breach.	<p>Information related to the spills reported to MECP can be found in the Supporting Documentation for Appendix L.</p> <p>Section 5.6.1 of the Rainy River Mine Comprehensive Closure Plan Amendment (October 2017) outlines the Geotechnical Design Criteria for the TMA dams and Water Management Pond dams (WMP). It indicates that;</p> <ul style="list-style-type: none"> - the dams have been designed to meet the most severe flood and earthquake criteria being the probable maximum flood and maximum credible earthquake in accordance with the Ontario Lakes and Rivers Improvement Act requirements. - The designs were supported by geotechnical investigations of subsurface conditions conducted by Klohn Crippen Berger (2010) and AMEC (2011, 2012, 	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
		<p>2013).</p> <ul style="list-style-type: none"> - 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. <p>An Operational Maintenance and Surveillance (OMS) manual was submitted to the MNRF as per conditions of the LRIA and accepted in August 2017.</p> <p>A copy of the OMS can be found in the Supporting Documentation for Appendix N</p>	
44	Runoff and seepage from the TMA and stockpiles will be captured, monitored, and either released to the environment if applicable criteria are met and/or re-used in the process plant during operations. Cyanide and metal concentrations in the TMA seepage and all treated effluent discharges to the environment will be controlled through the use of in-plant cyanide destruction and heavy metal precipitation, augmented by extended effluent aging in the TMA ponds.	Detailed design during 2019 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. Ditches and sumps have also been constructed around the East and West Mine Rock Stockpiles to capture any runoff or seepage.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	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 Rainy River Mine Operation, Maintenance and Surveillance (OMS) Manual for Water Management Structures (WMS). 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 the Supporting Documentation at the end of Appendix N.	Continued in 2019.
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.	In December 2019, New Gold submitted a response to the Government Agencies' second set of comments. There is no change with regards to the treatment of the tailings treatment at closure.	Not applicable in 2019.
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.	In December 2019, an updated Closure Plan was submitted to ENDM. There is no change with regards to the treatment of the tailings treatment at closure.	Not applicable in 2019.
48	The thickness and maintenance of water cover over the TMA will be clarified in the Closure Plan.	In December 2019, an updated Closure Plan was submitted to ENDM. There is no change with regards to the treatment of the tailings treatment at closure.	Not applicable in 2019.
49	A detailed monitoring plan will be developed as part of the Provincial closure planning process to ensure that the deposited tailings solids remain permanently	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	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>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>its construction phase into operations. The amendment has been reviewed by the appropriate agencies and it to be filed by ENDM in Q1 2020. It is important to note that the depositing of tailings in the TMA is in its early stages starting in September 2017.</p> <p>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 approx. 150m in width to be placed on the upstream side of the dam around two thirds of the ultimate perimeter allowing the remaining one third to be reclaimed at closure.</p> <p>The purpose of the overburden 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>	
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</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</p>	<p>Not applicable in 2019.</p>

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>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>	over the tailings as discussed in the Mine Closure Plan.	
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 discharge volumes to the Pinewood River; • 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 	<p>The Water Management Pond, via the Water Discharge Pond and Water Discharge Pipeline, discharged to the Pinewood River between October 9 and November 16, 2019.</p> <p>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 stopped on May 31, 2019. Authorization to deposit tailings in TMA Cell 3 was received on May 31, 2019. Prior to deposit in the TMA, process plant effluent passes through an in-plant slurry cyanide destruction (SO₂/AIR) treatment facility. Effluent is aged in the TMA and Water Management Pond for an extended period prior to supplemental</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>and in the water management pond to achieve the highest quality effluent reasonably achievable;</p> <ul style="list-style-type: none"> • 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 Department of Fisheries and Oceans (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>treatment from the Water Treatment Train. The Water Treatment Train construction was completed in September 2019.</p> <p>Management of site for ARD control during operations and following closure to prevent adverse water quality impacts to the Pinewood River include; The Mine Rock Pond was constructed and commissioned in 2017. Construction of Sediment Ponds 1 and 2 was completed in late 2018. Construction of the East Mine Rock Stockpile perimeter ditch was completed March 2019.</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. There is on-going monitoring under the Pinewood Biological Monitoring Plan for direct effects to fish (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, including direct effects to fish, are monitored under the Pinewood Biological Monitoring Plan.</p>	

Condition/ Tracking #	Description	Status 2019	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 MMER. All discharge locations will be regularly sampled in accordance with environmental approval requirements and will provide insight as to ongoing treatment system performance.	All final discharge points are controlled by a pump that is equipped with a calibrated flow measuring device and have a method to cease discharge. All final discharge points are sampled at the frequency required by MDMER and ECA 5178-9TUPD9 while actively discharging to ensure compliance.	Continued in 2019.
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.	Three approved effluent compliance points were active in 2019. All effluent met applicable Federal and Provincial guidelines for the protection of aquatic life, as well as ECA 5178-9TUPD9 site-specific limits.	Continued in 2019.
54	Minimize the number of final effluent compliance points as reasonable.	<p>Through 2019, there were four approved effluent compliance points under ECA 5178-9TUPD9, of which three were approved effluent compliance points under MDMER.</p> <p>Sediment Pond 1 Final Discharge Point was active between September 15, 2019 and October 9, 2019, with a total discharge of 113,154 m3 to the West Creek Diversion over 25 days.</p> <p>Sediment Pond 2 Final Discharge Point was active between October 4, 2019 and November 6, 2019, with a total discharge of 136,602 m3 to the Pinewood River over 34 days.</p> <p>The Water Discharge Pipeline was active between October 9, 2019 and November 16, 2019, with a total discharge of 411,557 m3 to the Pinewood River over 39 days.</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
		The fourth approved effluent compliance point under ECA 5178-9TUDP9, the Constructed Wetlands, has not yet been built.	
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.	Complete. Thresholds have been agreed to through the Provincial environmental approvals process. Permit to Take Water 8776-9W2QN3 expired on November 30, 2018. Water taking from the Pinewood River ceased on October 30, 2018.	October 30 th , 2018
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 hydrometric station (H1) was established on the Pinewood River on October 9, 2015 in consultation with the MECP. 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. Two new hydrometric stations were installed in the Pinewood River upstream of the mine (H2) and in the West Creek Diversion (H3) in September 2019. In December 2019, the New Gold H1 hydrometric station was upgraded.	Completed October 9, 2015. Upgraded December 2019

Condition/ Tracking #	Description	Status 2019	Date Completed
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.	Consistent with this commitment, there are four approved final effluent discharge locations per ECA 5178-9TUDP9. Approval for eight temporary final effluent discharge locations per ECA 5781-9VJQ2J expired on May 8, 2018.	Continued in 2019.
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 Constructed Wetland is scheduled for construction, in 2023, two years prior to closure. A two year pilot in situ test will be conducted in 2021. In the interim NG has constructed a treatment train that is consistent with the discharge criteria. It discharges at the same location along the Pinewood River as will the future Constructed Wetlands. The discharge is also consistent with the commitment of discharging from both the pipeline and the treatment train at mixing ratios of 1:1 into the Pinewood River.	Not applicable in 2019.
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 treated effluent to the Pinewood via the Water Discharge Pipeline and Pinewood Pumphouse occurred in 2019 under an Abatement Plan approved by the MECP. An abatement plan was requested as the mixing diffuser and associated works, as approved by MECP and MNR as an alternative to a rock groyne, could not be installed prior to discharge due to high water levels resulting from heavy fall rains. Installation of the mixing diffuser and associated works (EDL1) adjacent to the Pinewood Pumphouse was completed in December 2019.	Continued in 2019.
60	Scheduling of RRM development activities will consider environmental aspects, such as fish spawning.	During the early operating stage of the Rainy River Mine, activities and mitigation measures previously implemented to consider environmental aspects such as fish spawning include:	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
		<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. - In late 2019, in-water works in the Pinewood River and WCD were performed to install discharge structures and hydrometric instrumentation and were well outside of fish spawning windows as identified by the MNRF through the LRIA permit process. Fish salvaging for this work was performed under a LCFSP with no mortality to fish. - Vegetation buffers were left around all fish bearing water ways to protect aquatic life. This is done in an effort to prevent any sediment from roadways or mining activities from depositing into them. 	
61	A No Net Loss Plan and compensation strategy will be developed and implemented by NG to create new like for like habitats as project compensation and/or enhance existing restoration programs, to offset the RRM habitat losses.	<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 Bobolink 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 Loslo Creek, Marr Creek, 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 did not fill with 2019 freshet and did not activate the remaining 50% of the Stockpile Diversion after filling the pond. A geotechnical investigating is underway to address issues with Stockpile Pond and a plan to mitigate the issue is expected in mid-late 2020. West Creek Pond and Diversion again allowed for suitable fish passage during 2019 and as with Teeple and Clark systems are on track to meet DFO success criterion. 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 2018. 	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
62	Except where aquatic habitat will be overprinted (and compensated for as part of DFO authorizations) for project development, a 120 m buffer zone will be maintained adjacent to rivers and creeks to the extent practical, to protect watercourses and their associated vegetated margins.	<p>Buffer zones are maintained by reducing tree clearing, grubbing and equipment access. New Gold regulates this by:</p> <ul style="list-style-type: none"> - 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, and - conducting field inspections of work areas. 	Continued in 2019.
63	Fish flesh and fish organ tissue samples from the Pinewood River have been analyzed for metals for walleye and northern pike in the baseline condition. A commitment has been made to continue to monitoring metals in these two fish species after mine start-up. Should there be future evidence to show that fish are being taken from the Pinewood River on a more regular basis and prepared as a food source, NG would be pleased to work with these fishermen to collect and analyze a reasonable sampling to reflect any applied methods of food preparation.	Large body fish tissue sampling was not required in 2019 as it is meant to occur concurrent with MDMER and EEM sampling programs. In Fall of 2020 this program will be active again.	Not applicable in 2019.

Condition/ Tracking #	Description	Status 2019	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.	Large body fish tissue sampling was not required in 2019 as it is meant to occur concurrent with MDMER and ECA sampling programs. This program will be active in the fall of 2020.	Not applicable in 2019.
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 2019, erosion and sediment control measures were provided in the permit for all major infrastructure works including TMA Cells 2 and 3, Sediment Pond 3 and the Treatment Train. Each permit application, filed under the Lakes and Rivers Improvement Act (LRIA) and Environmental Protection Act, contained 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), an SOP has been developed and approved to better define this inspection. The annual Dam Safety Inspection was carried out by BGC (Engineer of Record) for all dams.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
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.	Continued in 2019.
68	Proposed (subject to modification to ensure participation and data sharing is adequate to meet the expectations of Aboriginal groups) surface water sampling program would include a First Nation training component followed by a rotating schedule whereby a First Nation representative would accompany NG staff on the monthly surface water sampling program. Laboratory results will be received by NG, reviewed and submitted to the identified individuals of each participating First Nation along with a summary explanation.	<p>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 2019, New Gold hired a second Environmental Monitor, from Big Island First Nation. This role also 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 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>	Continued in 2019.
69	Sampling of sediments will take place to evaluate soil quality parameters prior to undertaking any further closure activities for any contact water ponds and drainage works (including stockpile sediment ponds) where breaching is proposed.	<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 2019 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>	Not applicable in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
70	NG staff is willing to describe the ongoing water quality program and provide freshet data on request. The water management plan for the RRM provides for the management of all site contact waters in accordance with accepted industry standards including periods of high runoff, and sequences of high precipitation years.	No requests were made in 2019. A summary of water sampling data from monthly surface water sampling and water discharges are provided to the MECP area office each month.	Continued in 2019.
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 2019. There is one runoff pond located adjacent to Outcrop 3 that is used to capture runoff from the equipment laydown. This Outcrop has since been overprinted by construction of the East Mine Rock Stockpile. 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 underwent reclamation in 2018.	Continued in 2019.
72	Related to the transmission line: • Tree stumps, root mats and ground vegetation cover will be left intact to reduce the potential for surface erosion and to help maintain groundcover for plant and wildlife habitat • Vegetation (shrub) screens will be left to the extent practical along the single creek crossing that exists between Beadle and Preachers Lake, near the east end of the alignment, for erosion protection, while ensuring clearance requirements for conductors	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 Completed April 2016. No clearing as occurred on the transmission line since that time.	Completed November 2015 to April 2016.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<ul style="list-style-type: none"> • 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 exposed area would be re-seeded or otherwise stabilized to control erosion until native vegetation takes hold. If the erosion is more severe, other methods such as placement of straw matting or equivalent will be used • Where required in larger quantities, construction materials will be stored a minimum distance of 200 m from any open (non-frozen) surface water, and from major access points; and • Fueling and maintenance of vehicles will not occur within 50 m of surface waterbodies. 		

Condition/ Tracking #	Description	Status 2019	Date Completed
73	As a result of the independent First Nation review of the Final Environmental Assessment report, NG committed to a joint water quality monitoring and reporting program with the area First Nations (including Big Grassy River First Nation; BGRFN) as part of the existing monthly water quality monitoring program which is currently carried out by NG. The program will be funded by NG and form an integral part of the overall environmental management program as it relates to First Nations traditional knowledge and assurances of maintaining water quality and by extension, aquatic biota protection. The program will be developed jointly with the First Nations in lead-up to the initiation of mine construction. (Letter to Chiefs from Kyle Stanfield, October 2013).	In 2019, New Gold hired a second Environmental Monitor, from Big Island 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. In the event of a water quality exceedance that doesn't meet the requirements of the Metal Mining Effluent Regulation or the Provincial Water Quality Objectives, New Gold does inform Aboriginal Communities via email and through communication at the Environmental Monitoring Board Meetings.	Continued in 2019.
74	NG has committed to provide a program of close coordination with Rainy River First Nations in support of the pre-existing First Nation Watershed Program and water quality protection. Company funding will be provided as part of the fisheries compensation program to further water quality enhancement programs for the Pinewood and similar agriculturally impacted waterways.	<p>In 2019, New Gold hired a second Environmental Monitor, from Big Island 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 her community on a regular basis. In the event of a water quality exceedance that doesn't meet the requirements of the Metal Mining Effluent Regulation or the Provincial Water Quality Objectives New Gold does inform Aboriginal Communities via email and through communication at the Environmental Monitoring Board Meetings.</p> <p>In 2018, Rainy River First Nations and Naicatchewenin First Nation began Independent Environmental Monitoring of water and fish in the local area. This monitoring will alternate to include soil, vegetation, deer and fowl tissues. New Gold coordinates with the third party Independent</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
		<p>Environmental Monitor in order to access the site and collect samples.</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 traditional consumed by First Nation people in the Rainy River District. New Gold has allowed opportunity for First Nation Community Members to participate in the study as well as the onsite Environmental Monitor from Big Grassy First Nation. Results from this study are communicated through the Environmental Monitoring Board.</p> <p>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. In the event of a water quality exceedance that doesn't meet the requirements of the Metal Mining Effluent Regulation or the Provincial Water Quality Objectives New Gold does inform Aboriginal Communities via email and through communication at the Environmental Monitoring Board Meetings.</p>	
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 2019, non-acid generating rock was placed into the remnant Clark Creek channel system up until the wick-drain zone at the edge of the stockpile. Once the wick-drain zone is completed, non-acid generating material will continue to be placed up the channel to the edge of the stockpile.	Completed in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
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 monitoring wells were monitored and sampled throughout 2019, four times each, if not frozen, dry or in need of repair.	Continued in 2019.
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 monitoring wells were monitored for levels and water quality four times each, when not frozen, damaged or dry, in 2019. Data from 2019 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. Sampling continued in 2019, with thirteen local wells sampled. Appendix P.	Continued in 2019.
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.	As per the New Gold RRM Off-Site Groundwater Monitoring Plan, sampling of neighboring wells continued in 2019. Eleven neighboring property owners determined to be in the Zone of Influence (see map in plan) agreed to participate, and thirteen wells were sampled. The Off-site Groundwater Monitoring Plan will continue for the life of mine. New Gold is committed to rectifying issues related to water quality or availability shown to be caused to the mine. The Off-Site Groundwater Monitoring Plan assists with determining the cause of issues related to water quality or availability in local wells.	Continued in 2019.
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 2019.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
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 2019, one replacement groundwater monitoring well was installed adjacent to existing wells that could no longer be sampled, and 25 groundwater monitoring wells were repaired. Additionally, one groundwater monitoring well was relocated outside of the East Mine Rock Stockpile footprint and monitoring well 38 was decommissioned. The groundwater monitoring wells were sampled four times in 2019, if not frozen, dry or in need of repair.</p>	Continued in 2019.
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; • Accelerating open pit inflow following mine closure, to the extent practicable, balancing the need for managing water quality and maintaining Pinewood River 	<p>RRM water management activities is consistent with this commitment:</p> <p>Water from dewatering activities is sent to the Mine Rock Pond and Water Management Pond for recycling, or treated, to meet effluent quality regulations and released at licensed final discharge locations. The Mill operates a cyanide destruction unit. Runoff from the Mine Rock Stockpiles is captured by perimeter ditching. Runoff from the PAG dump during 2019 reported to the Mine Rock Pond and was used for processing in the Mill. As RRM is still operating, 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 2019.</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	flows over the interim period until the pit can be completely flooded; and <ul style="list-style-type: none"> 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 2019 was compliant with environmental approvals and monitoring plan requirements. During 2015 New Gold RRM implemented a site wide wildlife monitoring program that allows employees and contractors to report any wildlife sightings on the project. Education regarding SAR is provided during site orientation. In the fall of 2016, a White-Tailed Deer Tissue monitoring program was implemented to establish a baseline for potential metal and cyanide accumulation in deer tissue. Samples are collected from hunters in the area as well as deer killed in vehicle collisions. The study continued in 2017 and 2018. During 2019 the deer tissue collection program was not scheduled to occur nor was the same level of avian SAR monitoring as in previous years as per ESA permit appendix G. In 2019 the focus was on the Eastern Whip-poor-will Habitat Management Plan (EWPWHMP) and development of a draft with guidance from MECP and other stakeholders. A draft is expected in early 2020. SAR report is available in Appendix C.	Continued in 2019.
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.	Completed December 11, 2014.

Condition/ Tracking #	Description	Status 2019	Date Completed
84	Rare plant surveys are proposed to be carried out along portions of the preferred transmission line corridor in late Spring / early Summer, 2014. Prior to transmission line construction, additional data collection will be undertaken for that portion of the proposed transmission line routing (Alternative A) west of Highway 71, where there is a baseline data gap for rare plants surveys. This additional data collection will be undertaken to support transmission line permitting, and would consist of the following activities, spread across a 2 km corridor (1 km on either side the transmission line): transect surveys for vegetation communities including surveys targeting the presence of rare plant species. Results will be made available to MNR once the report is complete and the report will be referred to in the Errata.	Surveys were completed during 2014 and a report issued. The report was referred to in the issued Errata for the EIS / EA Report. September 19, 2014	Completed Summer 2014
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 	During 2019 the principal mitigation measures used to limit adverse effects to local vegetation included the use of water as dust suppressant on major haul roads and light vehicle roads during non-freezing conditions. In addition, speed limits on and around site were controlled. 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. Calcium chloride dust suppression was sprayed onto light vehicle access roads in June of 2019. Water trucks equipped with spray bars continued to spray water on all major haul roads in and out of the open pit and on all roads in and around major facilities. The primary crusher utilized a chemical suppression compound during stockpiling of ore.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	disturbed areas as part of progressive reclamation during operation and active reclamation at mine closure.		
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 	<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 2019.</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>itself. Construction vehicles will not be allowed to travel through surface waters</p> <ul style="list-style-type: none"> • Mechanical means will be used for periodic vegetation height maintenance along the transmission line, instead of herbicides. 		
87	<p>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.</p>	<p>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.</p>	Continued in 2019.
88	<p>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.</p>	<p>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 "tool box" talks to employees are used to remind the work force about the importance of following this policy as well as reporting wildlife sightings. During 2019 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.</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	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	Continued in 2019.
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 2019 were disposed of in an area of the mine site with limited to no human interaction or buried.	Continued in 2019.
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.	<p>In May 2016 the Wildlife Monitoring Plan for the RRM was accepted by the MNRF. During 2019 minimal specific monitoring was required from the Follow up Monitoring Plan. Monthly SAR were still reported, and wildlife sightings collected as well as a site mortality list (Appendix C).</p> <p>Fish tissue studies were also undertaken.</p> <p>Links to the Annual Compliance Report, located on the New Gold website, are provided to Aboriginal groups.</p>	Continued in 2019.
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 2019	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 2019 over 14 kilometers of exclusion fencing was installed along the footprint of the Tailings Management Area, Water Management Pond and Water Discharge Pond. New Gold RRM obtains a scientific research license from MNRF each year which allows for the live trapping and relocation of reptiles that may be impacted by activities on site.	Completed in 2019.
94	<p>In regard 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 applied during 2019:</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 site 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 mine site in an attempt to reduce vehicle collisions with wildlife. These locations were chosen based on the number of wildlife sightings reported in those areas. Regular bulletins regarding wildlife are emailed and posted on site. A log of collisions resulting</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	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 is kept and submitted as an appendix (Appendix K) the annual report.</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 Ministry of Environment and Climate Change in 2016. Food waste is removed on a frequent schedule and stored only in waste bins with lids until removed.</p>	

Condition/ Tracking #	Description	Status 2019	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 associated with the RRM. Signs warning drivers of 	<p>During the planning stage of the project, the size of the project site was taken into consideration and compaction of the site footprint 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 and in 2019 continued site wide speed limits and a no tolerance to speeding policy which remains in effect. Wildlife crossing signs were also installed during 2016 on project roadways known for high concentrations of wildlife. Visual observations made along project roadways did not show 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. The SO₂ system is online and operational to treat tailings before they leave the Mill. During 2019, all effluent discharged to the environment archived guidelines for protection of aquatic life or better. Generally abiotic conditions exist</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>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 realigned 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 effects to amphibians are anticipated, • Maintenance of generally abiotic conditions within the TMA to discourage wildlife presence, and 	<p>within the TMA. Cell 2 exposed tailings was covered with a capping agent known as Soil Cement and water in 2019, while Cell 1 had a water cover. Going forward all the TMA will receive the same treatment each year until closure.</p> <p>A wildlife exclusion fence was installed and monitored around the TMA, WMP and WDP in 2019.</p>	

Condition/ Tracking #	Description	Status 2019	Date Completed
	- 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.	Continued in 2019.
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 2019 was in full consideration of environmental aspects and no known timing conflicts occurred.	Continued in 2019.
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	ESA FF-C-001-14 dictates and outlines a monitoring plan that has been followed since 2014. The need for over 1800 hectares of Overall Benefit Land was identified which New Gold has purchased and maintained since early 2015. This permit did not dictate a mortality trigger and to date no EWPW or BOBO have been found dead on site. The permit was developed with EC, MNR and other stakeholders. MECP is now overseeing the ESA file for Ontario as of 2019-04-01.	Ongoing.

Condition/ Tracking #	Description	Status 2019	Date Completed
	Permit being developed by the MNR.		
100	Breeding bird surveys are proposed to be carried out along portions of the preferred transmission line corridor in late Spring / early Summer, 2014. Prior to transmission line construction, additional data collection will be undertaken for that portion of the proposed transmission line routing (Alternative A) west of Highway 71, where there is a baseline data gap for breeding bird surveys. This additional data collection will be undertaken to support transmission line permitting and would consist of point count surveys for breeding birds between late May and early July, spread across a 2 km corridor (1 km on either side the transmission line). Results will be made available to MNR once the report is complete. NG will provide opportunities to Aboriginal groups to receive the survey results.	Completed. September 19, 2014	Completed September 19/14
101	The primary mitigation strategies for limiting adverse effects to birds and habitat: • Inclusion of wildlife awareness information into regular safety and environmental inductions performed by the mine. Wildlife sighting logs or information boards	The following mitigation strategies for limiting adverse effects on birds and habitat were implemented during 2019: - 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 lunchrooms and a site wide protocol is in	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>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>place to report wildlife sightings to the security department via radio communication or online with the GIS wildlife viewer.</p> <ul style="list-style-type: none"> - Bear awareness training was also provided to interested staff in 2019. - In 2016 an eagle's nest was discovered in the north west portion of the property in an area of Overall Benefit Land (no construction). This is the second nest that has been documented on site. Both of these nests are also in areas that will not be subject to tree clearing. Annual monitoring of these nest found them both to have been active and at least one juvenile is known to have been produced in association with the nest in the south. 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. Most months at least one American Bald Eagle is reported on site. 	
102	<p>With 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 	<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. Prior to and during the construction period no</p>	Completed April 2016.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>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,</p> <ul style="list-style-type: none"> • 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 preclude larger avian species, particularly raptors which frequently use hydro pole for perching or nesting, from electrocution by contacting two conductor wires simultaneously, • Construction crews will be advised not to interfere with or harass wildlife. No hunting or fishing by construction crews will be allowed. Disciplinary actions 	<p>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>	

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>will be taken should either occur, and</p> <ul style="list-style-type: none"> 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, the Whip-Poor-Will Habitat Management Plan, vegetation plot monitoring and Closure Plan will address this as the mine is closed.</p>	Not applicable in 2019.
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, in order 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 possible while maintaining site safety aspects.</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
105	NG will implement a monitoring plan for Eastern Whip-poor-will populations and nesting in proximity to the proposed mine and transmission line sites, within compensatory habitat areas. Continue funding external research programs in collaboration with the MNR in order to further our understanding of this poorly studied species, as part of a larger overall benefits compensation package required by the Endangered Species Act permit.	A monitoring plan was developed in 2015 and implemented as required during 2019 in accordance with ESA FF-C-001-14. New Gold retains trained biologists to conduct monitoring as per permit conditions. A draft of the EWPW Management Plan was submitted to the MNRF in early 2019, and implementation of that plan will begin in 2020 if possible. As of 2019-04-01 the MECP is now the driving ministry for SAR and the ESA.	Continued in 2019.
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.	Overall Benefit Land has been provided in accordance with the Provincial ESA permit ESA FF-C-001-14 and the monitoring plan therein has been followed since 2015.	Continued in 2019.
107	NG will identify Barn Swallow nesting colonies prior to mine construction. Establish zones where Barn Swallow colonization is desired, tolerated or not wanted. Create artificial nesting structures to encourage recolonization or new colonization by Barn Swallows in areas where farm structures are removed. Implement a monitoring plan for Barn Swallow populations in proximity to the proposed mine and transmission line sites and in appropriate control areas.	Four artificial nesting structures were put in place in April 2015, prior to the 2015 breeding season. During 2019, the artificial structures were monitored, and 2 eggs were laid in the structure on Teeple Road as well as another nesting attempt. Upon the next visit to the utilized structure the eggs were gone. It is unknown what happened to the eggs.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
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 are 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. When issues are not addressed in a timely manner, light plants are shut down and removed from site at the area owner's expense. There were no issues with light plants in 2019.	Continued in 2019.
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 mine advances, opportunities for habitat development post closure will be examined. 2019 Annual SAR Monitoring Report submitted to MNRF January 10, 2020.	Continued in 2019.
110	Mitigation measures that will be used to reduce potential adverse effects to Eastern Whip-poor-will will include the following: <ul style="list-style-type: none"> • Provision of compensatory whip poor-will habitat that protects known territories and other identified suitable habitat, • Restricting the clearing of habitats to periods outside the breeding bird season which occurs from May 1 to August 15, • Implementation of sound abatement strategies to dampen sound infiltrating habitats surrounding high traffic areas of the mine, • Where feasible, management of site lighting fixtures to reduce excess light production near whip-poor-will foraging areas so as to minimize disturbing these nocturnal birds (with all 	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 between 2015 and 2018, the MNRF have received four annual monitoring reports. In 2019, no monitoring occurred as per the permit, efforts were focused on developing an EWPWHMP with the MECP. As the mine life advances, opportunities for habitat development post closure will be examined.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>appropriate health and safety issues considered),</p> <ul style="list-style-type: none"> • Maintenance of forest buffers between RRM components and whip poor-will nesting and foraging habitat where practical, • Management of dust through dust suppression activities (best,management practices), • Enforcement of speed limits along mine-controlled roads to reduce the potential adverse effects of increased vehicular traffic associated with the RRM. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity. A log of collisions will be kept to monitor the effectiveness of the proposed mitigation and additional mitigation measures will be implemented if necessary. <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"> • 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 		

Condition/ Tracking #	Description	Status 2019	Date Completed
	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 31, • Acquiring and protecting compensatory open country breeding bird habitat suitable for Bobolink breeding at a ratio of 1:1 for open-country habitat removed for RRM development, • Enforcement of speed limits along mine controlled roads to reduce the potential adverse effects of increased vehicular traffic associated with the RRM. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity. A log of collisions will be kept to monitor the effectiveness of the proposed mitigation and additional mitigation measures will be implemented if necessary, • Environmental induction of RRM personnel, including SAR 	Since the start of construction (2015) New Gold RRM has implemented the mitigation strategies listed in this commitment on site.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>identification and sensitivities and knowledge of Endangered Species Act permit conditions,</p> <ul style="list-style-type: none"> • 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. 		
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, 	<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.</p> <p>Monitoring of the success of the nesting structures has been completed over the past four years. 2016 was the first year that nesting attempts occurred in any of the structures, all structures went unused in 2017 and 2018.</p> <p>During 2019, two nesting attempts were made and one nest had two eggs laid in it. The eggs were later found to be missing and assumed to have been eaten by a predator. As the mine continues 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>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<ul style="list-style-type: none"> • 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 encouraged and does not cause problems to mine operations, • Enforcement of speed limits along mine controlled roads to reduce potential adverse effects of increased vehicular traffic associated with the RRM. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity. A log of collisions will be kept to monitor the effectiveness of the proposed mitigation and additional mitigation measures will be implemented if necessary, and • Implementation of a monitoring plan for Barn Swallow populations in proximity to the proposed mine and transmission line sites and in appropriate control areas. 		
113	Mitigation measures that will be used to reduce potential adverse effects to all species of Special Concern and Provincially rare species will include the following:	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 in available areas of mine infrastructure, purchasing new equipment	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<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, • 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 	<p>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.</p> <p>During the summer of 2016 wildlife crossing signs were installed at six locations to warn drivers of the possibility of wildlife encounters.</p> <p>Currently Black-billed Magpie are found throughout the project site with no colonization in high vehicular activity or areas of concern. Currently there are no mitigation measures necessary.</p> <p>These measures have been implemented since 2015 as part of general orientation. Seasonal changes in wildlife behavior are communicated via bulletins and toolbox talks. Tailings have been treated as required since 2017-09-14.</p> <p>Progressive reclamation working towards closure is on-going, at the end of 2019 an approximate 180 ha of mine site is considered reclaimed.</p>	

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>seasonal changes in wildlife behavior or presence in proximity to the mine,</p> <ul style="list-style-type: none"> • 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. 		
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	The Environment department met with Elders and representatives of Big Grassy FN, Seine River FN, Rainy River FN, Naicatchewenin FN, Ojibways of Onigaming FN, Nigigoonsiminikaaning FN, Lac La Croix FN, Naotkamegwanning FN, Animakee Wa Zhing # 37 and Couchiching FN in April 2019 to gather Traditional Knowledge for use in helping select plants and trees to plant in vegetation trial plots that will be planted in 2019. The information gathered from TK and trial plots will be used for reclamation as needed now and for mine closure.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
	available. (Letter to Chiefs from Kyle Stanfield, October 2013).		
116	NG will share results of the TK/TLU data sessions in a non-public First Nations forum(s). (Letter to Chiefs from Kyle Stanfield, October 2013).	TK/TLU data is owned by individuals and communities. NG has shared available data as requested within specific communities.	Completed Prior to January 15, 2015 as part of Environmental Assessment Consultation
117	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>In 2019, New Gold hired a second Environmental Monitor, from Big Island 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 her community on a regular basis. In the event of a water quality exceedance that doesn't meet the requirements of the Metal Mining Effluent Regulation or the Provincial Water Quality Objectives New Gold does inform Aboriginal Communities via email and through communication at the Environmental Monitoring Board Meetings.</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> <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</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
		in on site reclamation projects and reporting on site findings to their community.	
118	Additional information related to Lake Sturgeon and the Rainy River First Nations management program as requested, was added to the Final EA Report. NG has committed to a program of close coordination with Rainy River First Nations in support of the pre-existing First Nation Watershed Program and water quality protection. Company funding will be provided as part of the fisheries compensation program to further water quality enhancement programs for the Pinewood and similar agriculturally-impacted waterways.	In 2017 the RRM Environmental Manager met with the Rainy River Stewardship Committee on a few occasions to discuss potential programs, however the Committee didn't pursue the option. New Gold also requested First Nation participation in the annual Fish Tissue Sampling Program in the Pinewood River (Fall 2017 and 2018) however aside from the onsite First Nation Environmental Monitor there was no additional participation. In 2019 NG had identified candidates to participate in the program, however the efforts were not successful as the candidate did not attend a first aid course and could not join the sampling. More efforts have been deployed with the aim to augment FN participation in the 2020 program.	Continued in 2019.
119	NG will reach out to the Seven Generations Education Institute and/or the MNR to obtain any additional information on baseline health of animals and fish. (Letter to Chiefs from Kyle Stanfield, October 2013).	Completed as of March 3, 2014.	March 3, 2014.

Condition/ Tracking #	Description	Status 2019	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).	New Gold held presentations on the CPA 2017 in Onigaming (April 2019) and for the MNO (November 2019). New Gold submitted responses to Government comments on January 23, 2019; New Gold submitted supplemental information to ENDM on June 7, 2019; NG received second set of comments from MNRF and ENDM on October 2, 2019; and NG submitted responses to second set of comments from Government on December 13, 2019.	
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 with regarding the program. Additional information related to monitoring programs and results are shared with Aboriginal Communities through Environmental Monitoring Boards. The Monitoring Boards are regular meetings organized by New Gold as an opportunity to provide project updates and environmental monitoring and sampling information. The Deer Tissue program was not active in 2019 and will be re-started again in 2021 unless a need for increased frequency become apparent.	Not applicable in 2019.
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 2019	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 2019 related to the RRM that could affect the health of Aboriginal people. The Deer Tissue Monitoring Program was run in 2018 which is the third year of the program, the program will be run again in 2021. New Gold would still welcome any submission of tissue for analysis and now holds a database with which to compare samples against. No samples were submitted or collected in 2019.	Continued in 2019.
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).	Two Indigenous Community Coordinators are employed through New Gold to act as a liaison to employees and are 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 are provided to employees by request.	Continued in 2019.
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 the neighbours. Additionally, in 2019, there were two public tours and two newsletters distributed district wide. Neighbours Tour - Oct 8/2019 Public Tours - July 23/2019 and Oct 12/2019 Newsletter distribution - Aug 26/2019 and Dec 12/2019 Blast notifications are 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 neighbours. A neighbour was visited to discuss construction details at the TMA to provide information on the timeline of truck deliveries.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	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 2019 three members of the New Gold Environmental Department completed the Problem Black Bear Management Course provided by MNRF. This brings the total number of staff trained to six. 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.	Continued in 2019.
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 ten communities in 2019 (dates and communities listed in "Date Completed" section) and gathered Traditional Knowledge for use in helping select plants and trees to plant in vegetation trial plots that will be planted in 2019. The information gathered from TK and trial plots will be used for reclamation as needed now and during mine closure.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	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. 	New Gold has a Participation Agreement with BGRFN that takes this commitment into consideration.	Continued in 2019.
131	<p>NG has committed to provide members of the BGRFN, Big Island First Nation, Ojibways of Onigaming First Nation, Nootkamegwanning 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 2019, 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> <p>Nootkamegwanning business partner - March 26/2019</p> <p>RRFN community members - June 11/2019;</p> <p>AON JIC members - July 15/2019;</p> <p>Naicatchewenin Elders & community members - July 16/2019;</p> <p>Naicatchewenin students - July 24/2019;</p> <p>RRFN students - Aug 9/2019;</p> <p>RRFN/NFN EMB members - Aug 22/2019;</p> <p>RRFN/NFN contractor - Oct 10/2019;</p> <p>Onigaming students - Oct 24/2019;</p> <p>BGRFN JIC members - Nov 13/2019; and</p> <p>MNO attendees of CPA 2017 presentation - Nov 26/2019</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
132	NG has committed to ensure that Aboriginal communities (including BGRFN, Big Island First Nation, Ojibways of Onigaming First Nation, Naotkamegwanning First Nation, Rainy River First Nations, Naicatchewenin First Nation and Métis represented by the MNO Region 1 Consultation Committee) have the ability to access the site for cultural and ceremonial purposes so that local Aboriginal people can undertake ceremonies at different times of the year to show respect for the land and its spiritual aspects. This will ensure that young people can participate in ceremonies and learn from elders and ceremonialists. Teaching through the generations will therefore be maintained.	New Gold remains committed to the opportunity for ceremony. New Gold hosts Spring and Fall ceremonies; in 2019 there was an additional ceremony, the Renewal Ceremony. Spring Ceremony - May 14/2019; Renewal Ceremony - July 2/2019; and Fall Ceremony - Sept 25/2019.	Continued in 2019.
133	A detailed Fire Response Plan will be developed (Final EA Report, Section 8.2). This document will be made available for MNR review prior to construction initiation.	A detailed Fire Response Plan was developed in 2015. In 2016 the plan was reviewed. New Gold employees under the direction of the Health and Safety Department have established an Emergency First Response Team. Members of the team have been trained to use the onsite fire truck and fire suppression equipment.	Completed April 2016
134	NG will engage with local stakeholders as appropriate to provide notification of project activities and to mitigate potential impacts as practical.	NG sent out two newsletters in 2018, hosted Knights of Columbus and St. Mary's Church parishioners, Apr 13/2019 Grassy Narrows FN community members, Apr 17/2019 Pineview Mennonite Christian Day School, May 23/2019 FFHS Transportation Technology Class, May 27/2019 FFHS Manufacturing Class, May 29/2019 Seven Gens pre-employment graduates, June 5/2019 RRFN community members, June 11/2019	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
		<p>Local residents (small group), June 27/2019</p> <p>Local residents (small group), July 5/2019</p> <p>NWA 37 council members and youth, July 10/2019</p> <p>AON JIC members, July 15/2019</p> <p>Public Tours: Jul 23/2019, and Oct 12/2019</p> <p>Naicatchewenin FN Elders & community members, July 16/2019</p> <p>Naicatchewenin FN students, July 24/2019</p> <p>RRFN students, Aug 9/2019</p> <p>New Gold family tours, Aug 10 and Aug 17/2019</p> <p>RRFN/NFN EMB members, Aug 22/2019</p> <p>Neighbours Tour: Oct 8/2019</p> <p>RRFN/NFN business partner, Oct 10/2019</p> <p>Onigaming students, Oct 24/2019</p> <p>Lakehead University civil engineering students, Nov 8/2019</p> <p>BGFN JIC members, Nov 13/2019</p> <p>MNO attendees of CPA 2017 presentation, Nov 26/2019</p> <p>Career fairs:</p> <p>Kenora Student Options symposium, Feb 6/2019</p> <p>FFHS, Apr 10/2019, May 23/2019</p> <p>LLCFN career fair, Oct 23/2019, Nov 20/2019</p> <p>UNFC, Nov 6/2019</p> <p>WFB/NWA 33/NWA 37, Nov 14/2019</p> <p>Big Grassy, Nov 28/2019</p> <p>Mitaanjigamiing, Dec 3/2019</p>	

Condition/ Tracking #	Description	Status 2019	Date Completed
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>	Commitment completed 2015
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 Resources Strategy that focused on local employment which continued through 2018. As of December 31, 2019, 67% of New Gold employees were from the human environment 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>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. A career development officer is also employed by New Gold to ensure employees receive training and development as required.</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
137	NG will continue to engage with potentially affected stakeholders as the project develops, including those local and regional businesses which may provide accommodation facilities for the RRM workforce.	<p>NG continues to send out newsletters and engage with local stakeholders. Using external facilities, NG and its' contractors continue to engage with local businesses for accommodation as post-construction activities continue.</p> <p>Newsletters - distributed Aug 26/2019 and Dec 12/2019</p> <p>Local Ec Dev & business interest tours or meetings:</p> <p>Jan 10/2019, Jan 11/2019, Jan 30/2019</p> <p>Feb 7/2019, Feb 13/2019, Feb 21/2019, Feb 28/2019</p> <p>Mar 8/2019, Mar 13/2019, Mar 25/2019, Mar 26/2019, Mar 27/2019</p> <p>Apr 3/2019, Apr 12/2019, Apr 25/2019</p> <p>May 1/2019, May 6/2019, May 13/2019</p> <p>June 20/2019, July 3/2019, July 15/2019, July 17/2019, July 18/2019</p> <p>Aug 22/2019, Aug 28/2019</p> <p>Oct 4/2019, Oct 10/2019, Oct 11/2019, Oct 25/2019, Oct 29/2019</p> <p>Nov 1/2019, Nov 14/2019, Nov 15/2019, Nov 25/2019, Nov 26/2019, Nov 27/2019</p> <p>Dec 4/2019, Dec 9/2019, Dec 17/2019</p>	Continued in 2019.
138	Fish habitat compensation will be provided onsite related to the Federal Fisheries Act. A portion of this compensation habitat, notably the Clark Creek, Clark Creek pond and Teeple pond, could potentially be provided to licensed bait fishermen	NG completed an agreement with a local bait harvester on August 11, 2017.	Completed August 11, 2017

Condition/ Tracking #	Description	Status 2019	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. No logging activities were performed in 2019.	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 2019 a local logging company was hired to remove merchantable timber to support project development	Continued in 2019.
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 2019 (Operations Phase).	Not applicable in 2019.
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 with regards to PPE. New Gold is also part of the Excellence Program	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
		administered by WSIB, ensuring that we have a well-developed H&S Management System	
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 2019 related to the RRM, that could affect the health of Aboriginal or non-Aboriginal people.	Duplicate of condition 123
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.	Continued in 2019.
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.	In 2019, RRM continued to follow the blasting plans developed in 2018 which were consistent with 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.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
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 are evaluated to ensure worker safety and to minimize associated pollution and impact on wildlife. In addition, all supervisors are trained in our reporting system (INX), such that nonconformances can be reported and addressed in a timely fashion.	Continued in 2019.
148	The RRM has been designed to meet all applicable fire protection system requirements and codes. Regular fire drills will occur to ensure that all workers are familiar with fire response procedures, as dictated within the environmental management system. All workers and visitors on site will receive an orientation which includes fire reporting and response procedures.	All personnel on site receive a site orientation. The site has acquired a fire truck and an ambulance. An Emergency Response Team has been created and employee members have received training on how to respond to fires and other potential onsite emergencies. In order to prepare for major events, two fire drills and one major spill table-top exercise were held in 2019. New Gold also acquired a new fire extinguisher training system.	Continued in 2019.
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 2019.	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.	To date, public access has been maintained on the Marr Road via Korpi Road and signs have been installed to direct traffic accordingly. New Gold has a fully operational gate system at our main entrance and on Korpi access for the mine. Access through the west is now controlled by a locked fence.	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.	During 2019, RRM has realigned hydro lines to accommodate the new TMA buttress. In addition, new lines were installed around the site in order to minimize the use of portable generators. The work was consistent with condition 151.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
152	The re-aligned Highway 600 will be constructed by NG to MTO standards so that NG can pursue transfer of the road to the Province after construction.	This approach was taken during 2016. Construction of re-aligned Highway 600 was completed in 2016 and officially turned over to the MTO in 2017	Completed 2017
153	NG has had extensive consultations with the MTO in Thunder Bay related to the RRM highway planning and will continue to discuss issues related to the Highway 600 re-alignment, and associated maintenance and safety issues with MTO, the Township of Chapple, Stratton, the Rainy River Valley Safety Coalition, school bus operators, utility companies and emergency response groups.	In 2016, NG had extensive discussions with the MTO, Township of Morley, Township of Chapple and Hydro One regarding Highway 600. The re-aligned Highway 600 was opened to the public on December 23, 2015. An agreement was signed with the Township of Chapple on March 24, 2016. An agreement was signed with the Township of Morley on Feb 17, 2016. Ownership of the new portion of Highway 600 was turned over to MTO in 2017.	Completed 2017
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.	Has been implemented. Only licensed suppliers and carriers were selected for the supply and transport of hazardous materials to the RRM. Information was shared with the MNRF by the RRM in compliance with this condition during 2016.	Ongoing.

Condition/ Tracking #	Description	Status 2019	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.	Continued in 2019.
159	Notification and/or reporting of any vehicular accidents and spills will follow Provincial (Ministry of the Environment) and other applicable requirements.	During 2019, there were no incidents of vehicular accidents causing spills.	Continued in 2019.
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 2019	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 2019 NG has:</p> <ol style="list-style-type: none"> 1) committed to local employment 2) Introduced a travel allowance and new rotations to those outside of the local area and offered camp facilities to ensure costs are kept down on regional housing <p>Previous to 2019</p> <ol style="list-style-type: none"> 3) worked with local developers to construct new accommodation (an apartment facility) in the Township of Emo 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. 5) 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 Nations, 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>New Gold purchased the camp in Q4 of 2019 and outsources the operation of the camp to Anoki (a partnership between Naicatchewenin First Nation and Saulteaux Consulting and Engineering, Sodexo and Morris Group) The camp was downsized to house a maximum of 376 occupants. Any overflow requirements for NG contractors are directed to local motel/hotels.</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
162	Develop suitable policies and initiatives to encourage carpooling amongst employees, with the aim of reducing commuter-related traffic and reducing the individual burden of commuting. NG may explore alternate accommodation strategies to support its employees.	Completed on April 14, 2015. A number of former local residents have come forward to request copies of the reports which New Gold provided. During 2019, buses were used to transport employees to site from Fort Frances, Emo, Rainy River, Barwick and Stratton.	Completed April 14, 2015.
163	NG will continue to discuss the RRM and potential additional demands that could be placed on the services of regional Municipalities. NG will continue to support government-led initiatives that support social sustainability during all project phases. NG 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.	In 2019, New Gold provided support for the Fort Frances Physicians Recruitment and Retention Committee. As well, NG is reducing strain on the local medical system by employing a Nurse Practitioner on site that is available to all employees.	Continued in 2019.
164	Potential health risks associated with the consumption of ungulate organ meats will be mitigated through the voluntary submission of organ meats by local hunters for analysis. Results of any such analysis would be made available to local residents and Aboriginal communities.	In 2016 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. In 2018, 29 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	Not applicable in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
		<p>occur naturally in the environment and can be introduced by other human activities.</p> <p>The study continued in 2018 and was not active in 2019, 2020 but will be active 2021, 2024, 2027, 2030, 2033 and 2036 or as requested/needed. Continuing to develop this data set will strengthen any decision made based on submissions and monitoring plans through life of mine and post closure.</p>	
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 Morrisseau 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. In addition, New Gold now has an underground emergency response team. This continued into 2019.	Continued in 2019.
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 2019	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. To date 102 tissue and organ samples have been 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.</p> <p>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 102 samples tested, although a few had quite high variances with concentrations elevated over the majority of the values. The study continued in 2018 and is planned to run in 2021, 2024, 2027, 2030, 2033 and 2036 or as requested/needed.</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	Date Completed
		Results from the 2019 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 2019 Fish Tissue Quality Monitoring Report can be found in the Supporting Documentation in Appendix F. The study continued in 2017 and is planned to run in 2018, 2021, 2024, 2027, 2030, 2033 and 2036 or as requested/needed.	
169	NG will conduct a risk assessment of the potential long-term exposure of fish and wildlife to accumulated metals within the constructed wetland. Such a study will be carried out within one to two years prior to mine closure (or earlier during the project operations phase), and if a meaningful risk is determined to exist the risk will be mitigated as part of overall mine closure by removing and disposing the contaminated sediments to the bottom of the pit lake. This could readily be accomplished by a small dredging operation.	This commitment is currently not applicable to the current stage of the mine. The Constructed Wetland is scheduled for construction, in 2023, two years prior to closure. A two year pilot in situ test will be conducted in 2021.	Not applicable in 2019.
170	Unterman McPhail will prepare a complete description of the evaluation process for resources identified of cultural heritage value or interest in a memo format.	The memo was completed September 11, 2013.	Commitment completed September 11, 2013.
171	At closure, NG will undertake an evaluation of any remaining cultural heritage resources / structures located on NG property in consultation with a qualified professional, and also incorporating any liability/public safety concerns.	Not applicable to 2019.	Not applicable in 2019.
172	A range of conservation approaches will be considered in the recommended Cultural Heritage Assessment Report /	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	Ongoing.

Condition/ Tracking #	Description	Status 2019	Date Completed
	Cultural Heritage Documentation Reports for Sites #11 and #13 as suggested by MTCS.	currently in storage. As part of the development of the Richardson Trail, NG intends to highlight the settlement history through artifacts such as the hardware. Prior to the demolition, NG had contacted a representative of the Chapple Heritage Committee to ensure there were no other considerations. Site #13 remains in situ.	
173	NG will provide follow-up documentation related to Cultural Heritage Assessment Report / Cultural Heritage Documentation Reports to the following local museums and archives: <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. 	Completed on April 14, 2015. A number of former local residents have come forward to request copies of the reports which New Gold provided. Copies of the Final NG Cultural Heritage Resource Project Completion Report was completed in 2019 and distributed to: Rainy River Public Library, Fort Frances Public Library, Lakehead University Library, Emo Library, Township of Chapple and the Chapple Museum.	Commitment completed April 14, 2015.
174	Monitoring would occur for the following durations: <ul style="list-style-type: none"> • Archaeology: construction phase • Built heritage: construction phase 	New Gold had an onsite Archaeologist throughout the construction phase. No additional Archaeological or built heritage resources were identified in 2019.	Completed 2015 to 2017
175	With regards to protection of cultural heritage values during transmission line construction: <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 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 	No human remains or cultural resources were identified during transmission line clearing in 2015 to 2016; the Transmission Line construction was completed April 2016.	Completed April 2016.

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>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 2019	Date Completed
176	Related to transmission line, construction will be supervised by a qualified archaeologist at identified areas of high archaeological potential. Regular, ongoing discussions with stakeholders, Aboriginal people and local communities will help to monitor any effects to the socio-cultural environment and identify mutually satisfactory ways to mitigate negative or enhance positive effects. A formal complaints procedure will be established to provide stakeholders and Aboriginal peoples a voice during the construction, operation and decommissioning phase of the transmission line project. A response protocol will also be established to ensure that follow up occurs.	Prior to construction activities, NG conducted the required assessments on the transmission and line, which included the field assessment of high potential areas as per the 2011 Standards and Guidelines for consultant archaeologists. NG also employs a qualified archaeologist and in 2015 had consultant archaeologist on site. No cultural resources were identified during construction. Archaeology clearance letter was received on the transmission line on Dec 29, 2014.	Completed December 29, 2014.
177	A targeted site investigation will be conducted at the end of mine life to identify soils that may have been affected by hydrocarbons or chemicals in specific areas (e.g. truck refueling area). Soil materials found to exceed the appropriate clean up criteria for hydrocarbons will be remediated according to government requirements. If there is reason to suspect an area of soil has been affected by chemicals other than hydrocarbons, soil samples will be collected and tested. If the applicable regulatory requirements are exceeded, an appropriate method of disposal will be sought in consultation with the relevant authorities.	This condition will be applied at the time of mine closure and reclamation.	Not applicable in 2019.

Condition/ Tracking #	Description	Status 2019	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 2019.	Continued in 2019.
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.	BGRFN and NG signed a Participation Agreement on January 9, 2015. In the agreement there is a defined protocol for communication and engagement.	Commitment completed January 9, 2015.
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 personal 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 (Intelex) in 2017 which houses all of the permit conditions and compliance conditions for the Rainy River Mine. Employees are assigned to these tasks and are required to enter appropriate data, reports and outcomes to ensure compliance with site-specific conditions and approvals.</p> <p>In 2019, New Gold has fully developed an EMS, and implementation has started. The year 2020 will see the implementation completion and automation of the EMS.</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	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.	Since 2018, the EMS continues to be developed using the ISO 14001 Standards and will include operational procedures with penalties for nonconformance.	Continued in 2019.
183	Procedures will be regularly reviewed as part of the environmental management system.	In 2019, the development of an ISO 14001 compliant Environmental Management System (EMS) was completed for the RRM. This included generation of all the governing and reporting documents required in the system, such as the EMS Policy, EMS Manual, Management Plans, Tasks Lists, Status Reports, etc. Both New Gold Corporate and the RRM have policies and procedures in place that are reviewed.	Continued in 2019.
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.	Since 2018, the EMS continues to be developed to adapt to the new products and risks being identified in the operation. The emergency response plan included in the RRM EMS addresses the primary hazardous materials onsite and spill response. In 2019, the Emergency response plan was reviewed and environmental emergencies are being added.	Continued in 2019.
185	All chemicals used at the site will have a Material Safety Data Sheet, in order to comply with the best practices in the industry for health and safety, and to provide relevant regulatory standards for the safe use of these materials.	The Material Safety Data Sheets are provided to New Gold RRM users and are accessible from the online site wide MSDS registry. Within this system, regular review and updates to the MSDS are a required by the department which owns each chemical. This aspect is included as part of the RRM Health and Safety WHMIS Program. WHMIS training is ongoing.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	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.	In 2019 NG hired a Senior Water Management Engineer, a Tailings Engineer and an Environmental Technician. These extra Specialists are helping NG to transition most of its monitoring requirements in house. Third party reviews of reports still occur to ensure quality assurance.	Continued in 2019.
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. 	<p>The Follow Up Monitoring Plan (FMP) for the Rainy River Project/Mine is designed around three central principles of environmental protection; Do not harm culture, respect for Aboriginal culture and values; continuous improvement and compliance with all environmental approvals and authorizations. The FMP applies to all stages of the project and the principles of the plan have been incorporated into the regular routine of how New Gold conducts business. Key components of the FMP have been incorporated into the Environmental Monitoring System (EMS) that New has developed. 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 Intalex, where assigned employees are responsible for tracking performance against these commitments and conditions.</p> <p>In 2019, NG has partially implemented the new Environmental Management System (EMS). The year 2020 will see the completion of the implementation and the automation. The EMS complements and governs Intalex.</p>	Continued in 2019.
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.	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	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 2019, the development 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 development of the EMS system.</p>	Continued in 2019.
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 2019, the development 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 Rainy River Mine's commitment to ongoing environmental compliance.</p>	Continued in 2019.

Condition/ Tracking #	Description	Status 2019	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.	In 2019, the development of an ISO 14001 compliant Environmental Management System (EMS) was completed for the Rainy River Mine (RRM). As part of the EMS, periodic management reviews will be conducted to ensure continuous improvement.	Continued in 2019.
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. New Gold submitted a response to the Government Agencies' second set of comments in December 2019 and should be filed by ENDM in Q1 2020.	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, Naothamegwanning 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 Naothamegwanning 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, Naothamegwanning First Nation, Ojibways of Onigaming First Nation and Métis community	NG hosts two annual ceremonies at site; additionally Aboriginal liaison personnel meet with community members to discuss activities, ceremony, etc. All NG employees undertake a 4 hour Indigenous engagement (cultural awareness) session as part of onboarding. During 2019 the following ceremonies were held onsite:	Ongoing.

Condition/ Tracking #	Description	Status 2019	Date Completed
	members on traditional teachings and ceremony.	Spring Ceremony - May 14/2019; Renewal Ceremony - July 2/2019; and Fall Ceremony - Sept 25/2019.	
196	NG will review the Big Grassy River First Nation Traditional Knowledge / Traditional Land Use study and discuss accommodations of the cultural heritage sites identified.	This was addressed during Participation Agreement discussions. A Participation Agreement was signed with BGFN on January 9, 2015.	Commitment completed January 9, 2015.
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</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 2019	Date Completed
	to provide guidance to construction teams in the absence of the qualified environmental persons. The results of the inspections will be documented and follow-up actions, if any, delineated. Completion of follow-up actions will be confirmed during subsequent inspections. Inspection frequency will be increased should the need be identified. The duration of post-construction inspections will depend on the results of the construction inspection. At a minimum, periodic aerial inspection will occur for environmental aspects during operation, coincident with other aerial surveys.		
198	NG will continue to communicate closely with First Nations and the MNO regarding the Project. (Letter to Chiefs from Kyle Stanfield, October 2013).	<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 Mitaanigamiing First Nations) - March 22, 2012</p> <p>Rainy River First Nations/Naicatchewenin First Nation - Oct 10, 2014</p> <p>Big Grassy River First Nation - Jan 9, 2015</p> <p>Metis Nation of Ontario - Nov 25, 2014</p> <p>Anishinaabeg of Naongashiing First Nation - October 31, 2017</p> <p>Ojibways of Onigaming First Nation - May 24, 2017</p> <p>Naotkamegwanning First Nation - April 19, 2017</p> <p>Animakee Wa Zhing #37 First Nation - Feb 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 2019	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.	New Gold has a participation agreement with the MNO (Nov 25/2014) and continues with regular engagement with NG Rainy River.	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 Rainy River project, through newsletters, face to face meetings, site tours, business opportunities and job postings. Condition 9 of the EA approval is being fulfilled, although the level of engagement is directed by the communities.	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 with 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 2019	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 2019.	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 2019.	Ongoing.

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