

# **SECTION 6**

## **NEW GOLD RAINY RIVER MINE**

### **FOLLOW UP MONITORING PLAN**

#### **REGISTRY**



*Figure 21 Pinewood River ice going out*

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Condition/ Tracking #	Description	Status 2019	Date Completed
13.1.	<p>RRR expects that it will be responsible to carry out the FMP (Follow Up Monitoring Plan); and further, that the involved Federal and Provincial agencies and authorities will have a review and monitoring role regarding the implementation of the FMP by RRR and will require RRR to take corrective action for non-compliance as appropriate. Local Aboriginal groups are considered by RRM to be involved parties for the purposes of the FMP, and accordingly, local First Nations and Métis will be provided the results of the FMP.</p>	<p>Highlights of the Follow Up Monitoring Plan submitted in Section 13 of the Provincial Environmental Assessment for the Rainy River Project have been included in this Compliance Report. The Follow Up Monitoring Plan was originally provided with New Gold's Environmental Assessment to the MECP for review and input by government agencies. New Gold has involved government agencies and Aboriginal groups in the implementation of their monitoring programs and results.</p> <p>New Gold RRM continues to meeting with Environmental Monitoring Boards which are attended by local Aboriginal Groups and discuss ongoing environmental monitoring, research programs and results. Popular topics of discussion include; water quality, wildlife and air quality.</p> <p>New Gold RRM continues to provide onsite tours for government agencies, Community members and employee's families to discuss mining operations, ore process and environmental monitoring.</p> <p>New Gold involved the MNRF on the creation and implementation of the Rainy River Project's Terrestrial Monitoring Plan (Finalized in 2016) The Environmental Department provides the MECP with monthly updates on water quality sampling and project updates related to water taking, construction and water quality. Additional reports associated with the monitoring programs outlined in the Follow Up Monitoring Plan have been shared with the appropriate government agencies (i.e.; Fish Tissue Sampling (DFO), Air Quality Monitoring and Acoustic Monitoring (MECP)) and are included as supplemental information with this report (appendix D).</p>	Ongoing
13.2.2	<p>For fugitive dust from roads, stockpiles and open pit operations, RRM will assess the effectiveness of planned dust control measures both visually by plume assessment, and using dust fall jars and high-volume samplers for</p>	<p>Ambient Air Quality Monitoring Program continued during 2019. Data was collected from two air quality sampling stations: one to the east of the site on Gallinger Road and one to the south of the site near the beginning of the Highway 600 reroute on Tait Road.</p>	Ongoing

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>total particulate and PM2.5. Dust fall samples will be collected monthly during the non-winter period for the construction, operation and active reclamation project phases. Select filter samples will be assessed for metals (full metal scan and including mercury, arsenic, cadmium and lead). Two monitoring stations will be set up at the approximate property boundary locations shown in Figure 13-1 subject to power availability and location specific constraints. Equipment siting, operations, auditing and reporting will follow all appropriate MOE requirements as provided in the Operations Manual for Air Quality Monitoring in Ontario (MOE 2008).</p>	<p>These stations are equipped with hi-samplers (brush motor and mass flow controlled), PQ200 samplers and passive sampling for SO<sub>2</sub> and NO<sub>2</sub>. The hi-samplers measure Total Suspended Particulate (TSP) and metal concentrations averaged over a 24-hour period. The metals and metalloids analyzed include arsenic (As), cadmium (Cd), chromium (Cr), cobalt (Co), copper (Cu), iron (Fe), lead (Pb), manganese (Mn), nickel (Ni), selenium (Se), vanadium (V), and zinc (Zn). The PQ200 samplers measure Particulate Matter 2.5 (PM<sub>2.5</sub>) concentrations averaged over a 24-hour period. The samplers measure total deposition over a 30-day period. Passive sampling measures SO<sub>2</sub> and NO<sub>2</sub> concentrations over a 30-day period. There were three exceedances in 2019: one of TSP and the other two for monthly total dustfall limits, all measured at the Gallinger Road station. The TSP exceedance was attributed to technician error. The total dustfall threshold limit exceedances were caused by the presence of organics, such as dead insects caught in the dustfall jars.</p>	
13.3.2	<p>Subject to consultation and support from area residents and the regulatory agencies, RRR plans to measure sound levels at (or near) residences positioned around the RRM site (Figure 13-1). These would include:</p> <ul style="list-style-type: none"> <li>• One residence to the south of the mine site in Black Hawk;</li> <li>• One residence to the east of the mine site on Gallinger Road;</li> <li>• One residence to the southeast of the mine site on south Gallinger Road;</li> <li>• One residence to the west of the mine site in Dearlock; and</li> <li>• One residence to the northwest of the mine site on Highway 600.</li> </ul> <p>A dedicated remote monitoring system may be used to provide a real time access system. All sound monitors will conform to MOE NPC-103 measurement protocols. As per MOE protocols, sound level</p>	<p>Sound was not measured at the listed locations (residences) during 2019. A program will be implemented in 2020.</p>	Ongoing

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>measurements are to be taken at each measurement location. Hourly Leq, L10, L90 and Lmax will be recorded. Audio samples based on trigger levels will also be recorded. Trigger levels, with automated alerts will be developed for addressing exceedances.</p>		
13.4.2	<p>In addition, RRR will carry out the following geochemical monitoring program:</p> <ul style="list-style-type: none"> <li>• As part of the ongoing mine rock management plan, collect and analyze blast hole drill cuttings for analysis of total inorganic carbon and total Sulphur, using a Leco furnace, as a means of segregating PAG and NPAG materials for optimal management of PAG mine rock;</li> <li>• Submit a subset of Leco furnace samples, collected as part of the ongoing mine rock management plan, for acid base accounting static testing and metals analysis;</li> <li>• Collect and analyze mill composite tailings samples, on an approximate monthly basis, for acid base accounting static testing and metals analysis; and</li> <li>• Conduct additional geochemical testing on an as required basis to provide further information on Project specific aspects, such as any conditions of note evolving out of developing trend analyses.</li> </ul>	<p>A Geochemical Monitoring Plan for the Construction and Operation Phases was issued in accordance with MECP ECA 5178-9TUPD9 requirements and was implemented in 2016. Monitoring continued through 2019 and included analyzing blast hole drill cuttings using a Leco furnace and submission of a subset for ABA and metals analysis, per the commitment.</p>	Ongoing
13.5.2	<p>Collect and analyze samples, and measure rates of flow, as appropriate, from site discharges, and runoff and seepage collection facilities, at the start of their respective operations, including:</p> <ul style="list-style-type: none"> <li>• TMA discharges to the Pinewood River both directly by pipeline discharge and through the constructed wetland;</li> <li>• Sedimentation Pond #1 and #2 discharges to West Creek;</li> <li>• Aggregate operation(s), discharges (if any);</li> <li>• Sewage effluent discharge; and</li> <li>• Runoff and seepage collected from site operations areas (TMA,</li> </ul>	<p>A monitoring program was put in place during 2015 and continues to be in place. During 2019, surface water was monitored on and off site as per the Surface Water monitoring program. All effluent discharges in 2019 met the provincial and federal discharge requirements.</p>	Ongoing

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>overburden and mine rock stockpiles, plant site area and haul roads) in accordance with MMER and Environmental Compliance Approval requirements.</p>		
13.5.2 B	<p>For each of the above, where there is a discharge to a receiver (West Creek or Pinewood River) monitor on a monthly basis (commencing at least three months before the first anticipated discharge / release) the quality of waters upstream and downstream of discharge and runoff / seepage releases at proposed monitoring locations shown in Figure 13-2, inclusive of three stations on West Creek and five stations on the Pinewood River (including Pinewood River baseline monitoring stations SW10, SW3 and SW15. The two current baseline monitoring stations on the Rainy River (SW16 and SW17) would also be maintained for monthly monitoring. Quarterly samples from selected water quality sampling stations will be collected for trace analysis of total and methyl mercury in discussion with the MOE.</p>	<p>The receiver monitoring was conducted on a monthly and quarterly basis as per the commitment. All samples collected from the receivers met the Environmental Approval requirements. In 2019, total and methyl mercury samples were collected during the open water period in the Pinewood River upstream and downstream of the site.</p>	Ongoing
13.5.2 C.	<p>Monitor flows as shown in Figure 13-2 commencing as soon as construction is completed on the West Creek pond and the West Creek diversion at:</p> <ul style="list-style-type: none"> <li>• West Creek at the West Creek pond outflow</li> <li>• West Creek diversion; and</li> <li>• Pinewood River at Highway 617 (Water Survey of Canada Station WSC 05PC023).</li> </ul> <p>Flows are already being measured for the Pinewood River at WSC Station 05PC023. Note that given the importance of the WSC station to overall site water management as per Section 4.12, RRR will need to enter into an agreement with WSC to ensure that the station will be maintained throughout the RRM mine life, and that data will be made available to</p>	<p>Construction of the West Creek Diversion (WCD) was completed in 2017, however dry conditions that persisted through 2017 and 2018 were not conducive to installation of water level transducers in the absence of water flow. A water level transducer was installed in the West Creek Pond in April 2018. A hydrometric station was installed in the WCD within the Box Culvert in September 2019, referred to as New Gold RRM H3 Hydrometric Station.</p> <p>The WSC 05PC023 hydrometric station remains active, however New Gold installed a dedicated hydrometric station upstream on the Pinewood River in late 2015 to supplement this data source, and continued to monitor the station through 2019. In December 2019, this hydrometric station was upgraded per the RRM Hydrometric Monitoring Plan. It is now referred to as</p>	Ongoing

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>RRR on a daily basis, and that RRR would be immediately informed of any maintenance activities which could influence its operations.</p>	<p>New Gold RRM H1 Hydrometric Station (formerly Site 19).</p> <p>In September 2019, a hydrometric station was installed upstream of the RRM in the arch culvert that passes under Heatwole Rd, off of Teeple Rd. This location is referred to as New Gold RRM H2 Hydrometric Station.</p>	
13.5.2 D.	<p>As data availability permits, develop annual updated statistical flow estimates for local watercourses based on flow data derived through monitoring, with such estimates to include:</p> <ul style="list-style-type: none"> <li>• Monthly averages</li> <li>• Annual averages</li> <li>• Extreme low flow statistics corresponding to 2, 5, 10 and 20 year return period conditions; and</li> <li>• Extreme high flow statistics corresponding to 2, 5, 10 and 20 year return period conditions.</li> </ul>	<p>In-stream measurements were on going during 2019 in the Pinewood River at the H1 (formerly Site 19) and new H2 hydrometric station upstream of site. H3 hydrometric station was installed in the West Creek Diversion in September 2019. Continued in-stream flow monitoring is planned for 2020.</p>	Ongoing
13.5.2 E.	<p>Carry out an environmental effect monitoring (EEM) program in accordance with the Metal Mining Guidance Document for Aquatic Environmental Effects Monitoring (EC 2012d) to assess the character and quality of aquatic resources at the following locations:</p> <ul style="list-style-type: none"> <li>• West Creek diversion; and</li> <li>• Pinewood River upstream and downstream of the RRM site area.</li> </ul>	<p>The Cycle 1 EEM Study Design Report was prepared for submission in 2016, the subsequent Cycle 1 biological monitoring was conducted in 2017. The cycle 1 Interpretive Report was submitted to ECCC by March 31, 2018. Timing of Cycle 2 EEM studies is scheduled for 2020.</p>	Ongoing
13.5.2 F.	<p>Except as provided for in Item E, above, carry out commencing one year after the date of commercial production and at three year intervals thereafter, fish habitat and fisheries assessments, including sediment and benthos investigations for:</p> <ul style="list-style-type: none"> <li>• West Creek;</li> <li>• Clark Creek (upstream of the east mine rock stockpile); and</li> <li>• Pinewood River.</li> </ul>	<p>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.</p>	Ongoing

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>Monitor contaminants of potential concern in fish tissues from game fish harvested from the Pinewood River coincident with monitoring carried out pursuant to Item F, above.</p>		
13.5.2 H	<p>As a component of the RRM stormwater management plan, collect and analyze late winter snowpack samples for pH and metals to help determine the effects of dust fall accumulated within the snowpack during spring melt.</p>	<p>Passive dustfall monitoring was completed 2019. Snowpack samples are scheduled for later February and early March 2020.</p>	Ongoing
13.6.2	<p>RRR will carry out groundwater system monitoring as per the following:</p> <p>A. Collect and analyze samples, and measure pumping rates for mine water from the open pit and underground transferred to the mine rock pond (or to the TMA during construction);</p> <p>B. Establish a groundwater well (piezometer) network around the open pit area to monitor groundwater levels throughout the area on a continuous basis using water level transducers, with transducer downloads to be completed twice per year, commencing at least six months prior to the start of pumping, all as shown in Figure 13-3;</p> <p>C. Collect groundwater samples from the groundwater well / piezometer network quarterly except where prevented by freezing conditions, and analyze the samples for applicable parameters as provided for in Provincial approvals; and</p> <p>D. Review groundwater monitoring data annually and update the groundwater model on three year intervals, with the first such update to be based on data obtained from the first three full years of</p>	<p>A) Internal monitoring samples are collected and analyzed for the Mine Rock Pond (MRP). A record of the volume pumped from the open pit, and future underground operation, is generated daily during movement of water from the mine to the MRP or the Mill.</p> <p>B) A groundwater well program was established that extends around the mine footprint, sampling began in early 2016. Selected piezometers / wells include water level transducers, with downloads completed quarterly in conjunction with sample collection and manual water level measurements.</p> <p>C) Groundwater well samples were collected from the piezometer / well network quarterly during 2019, however some wells were not sampled due to required repairs or frozen conditions in spring and late fall.</p> <p>D) The groundwater samples were analyzed for the parameters in the Provincial Environmental Compliance Approval, and the data was reviewed during 2019. The 3-D groundwater model was not updated in 2019, with the next scheduled update for 2021. An update of the 1-D groundwater model was completed in early 2020.</p>	Ongoing



Condition/ Tracking #	Description	Status 2019	Date Completed
	pumping; and with the model updates to be completed within nine months of the end of the data collection period.		
13.7.1	A wildlife monitoring plan will be implemented to ensure that effects on wildlife are properly mitigated. FMP monitoring will be based where possible, on standard survey protocols used during baseline studies so that any changes in local mammal, area-sensitive breeding bird or amphibian populations may be detected.	The comprehensive Wildlife Monitoring Plan was issued May 25, 2016 (Version 5) and followed during 2019.	May 25, 2016
13.7.2	<p>Methods for determining adverse RRM-induced effects on mammals following the implementation of proposed mitigation measures will include:</p> <ul style="list-style-type: none"> <li>• Bat acoustic monitoring at representative locations;</li> <li>• Aerial helicopter survey in late winter to document numbers and distributions of White-tailed Deer, Moose and Wolves at locations representing suitable habitat directly adjacent to the RRM site; and control sites. Such surveys to be conducted during the first winter of the construction phase, the winter following the completion of construction, and at three year intervals thereafter until the end of the active mine reclamation phase;</li> <li>• Working with any Aboriginal hunters to document White-tailed Deer, Moose, Wolf and Black Bear harvesting activities in the RRM site area;</li> <li>• Implementation of a wildlife log (including collisions) of general mammal observations made by employees on the RRM site including White-tailed Deer, Moose, Black Bear and any other larger furbearers; and</li> <li>• Monitoring of Black Bear activity related to waste disposal (if</li> </ul>	<p>The MNRF aerial surveys did take place in January and/or February 2019 and covered the District with transect lines spread out much wider than just the RRM.</p> <p>Bat acoustic monitoring was not completed during 2019 as the data reported on for previous years still has pending questions and current methodology has been flagged for review by consultants retained by New Gold. It should also be noted that during baseline monitoring prior to the commencement of construction it was concluded that no suitable bat habitat existed within the area of tree clearing for project development.</p> <p>New Gold RRM implemented a wildlife log at the site during 2015 and continued documenting wildlife sightings and interactions through 2019.</p> <p>In 2016 the Environmental Department started tracking sightings in a GIS database. The wildlife logs for 2019 include documented Black Bear activity and a mortality log. New Gold has been sending staff to receive training from the Ministry of Natural Resources and Forestry on how to live trap and relocate nuisance Black Bears.</p>	Ongoing

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	applicable) and general site activities.		
13.7.3	<p>Methods for determining adverse effects to breeding birds following the implementation of proposed mitigation measures will include:</p> <ul style="list-style-type: none"> <li>• Targeted point count surveys for diurnal SAR including Golden-winged Warbler, Barn Swallow and Bobolink and for woodland area-sensitive breeding birds in suitable habitat. Point counts will be based on standardized survey protocols described for the Ontario Breeding Bird Atlas Guide for Participants (OBBA 2001) so as to be consistent with baselines study methodology (Section 5.2.12),</li> <li>• Incidental data collection for SAR and Provincially rare species which are currently present at lower abundance including: Canada Warbler, Olive-sided Flycatcher, Short-eared Owl, American Pelican, Bald Eagle and Black-billed Magpie,</li> <li>• Targeted twilight surveys for Eastern Whip-poor-will in suitable habitat. Whip-poor-will monitoring efforts will follow standardized survey protocols as outlined in the</li> </ul>	<p>Bird surveys were not required for 2019 as per New Gold's ESA permit.</p> <p>To support the monitoring of bird species onsite, the Environmental Department implemented a site wide protocol for reporting wildlife in 2015. Through this system the following bird sightings were reported in 2019; 3 bobolink, 52 barn swallow, 1 Cougar 30 eagle, 60 pelicans, 1 EWPW, 1 Snapping turtle, 1 Peregrine Falcon, 3 other raptors and 7 swans.</p> <p>It should be noted that all sightings for 2019 came from the general population of the mine and not consultants as in previous years. Education and awareness of the reporting procedure and onsite Species at Risk is conducted through new employee/contractor orientation and site wide publications. The 2 known eagles' nest near the project boundary are monitored each year through visual observation.</p>	Ongoing

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	<p>whip-poor-will Roadside Survey Participant's Guide (BSC 2012).</p> <ul style="list-style-type: none"> <li>• Concurrent data collection for Common Nighthawk to be undertaken during targeted Eastern Whip-poor-will surveys as described above as no standardized survey protocols have been developed specifically for this species;</li> <li>• Annual monitoring of active Bald Eagle nests which occur in close proximity the RRM site. Monitoring will attempt to establish fledging success;</li> <li>• Implementation of a wildlife log of general breeding bird observations at the RRM site by employees (focused on raptors and raptor nests, and SAR species); and</li> <li>• Any additional monitoring defined in ESA permits.</li> </ul>		
13.7.4	<p>Effects on amphibians after implementation of proposed mitigation measures will include:</p> <ul style="list-style-type: none"> <li>• Implementation of a wildlife log of general amphibian observations by employees.</li> </ul>	<p>Leopard and Green frogs are a common sight on the mine site especially in compensation and offset habitats built as per DFO requirements. Spring peeper and wood frogs are a rare sight.</p>	
13.8.2	<p>This section considers the potential for traffic accidents on public roads related to the construction and operation of the RRM. Roads of specific interest are:</p> <ul style="list-style-type: none"> <li>• Highways 71 and 11, west of Fort Frances and south of Kenora;</li> <li>• Highway 600;</li> <li>• Teeple Road west of Highway 71; and</li> <li>• East Access Road.</li> </ul> <p>Methods for assessing traffic accidents along public roads will include:</p> <ul style="list-style-type: none"> <li>• Monitoring road surface conditions for the identified roads of interest during the winter months and working with the MTO</li> </ul>	<p>New Gold employees and on-site contractors are required to report all near misses and traffic accidents immediately to the New Gold Health and Safety Department. A record documenting system is in place. In some instances, drug and alcohol testing may be required and can be conducted on site by trained staff.</p> <p>New Gold has a zero-tolerance policy in place for any employees or contractors caught driving while using a cell phone. There are also policies in place to control speeding on site.</p> <p>Security conduct road inspections on site each night shift. These inspections include Teeple Road, East Access Road and Highway 600. If hazards are identified on roads owned and maintained by New Gold, they are</p>	Ongoing

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	<p>(MTO) and the local municipalities, to ensure that roads are properly cleared, salted and sanded, as appropriate to maintain safe driving conditions;</p> <ul style="list-style-type: none"> <li>• Maintaining a record of any accidents involving RRR employees and contractors related to the RRM; and</li> <li>• Maintaining a record of any near misses related to potential traffic accidents along the roads of interest involving RRR employees and contractors related to the RRM.</li> </ul>	<p>addressed by an onsite construction team. Hazards identified on municipal or public roads are reported to the appropriate authority (Municipality or MTO).</p> <p>Reports of road hazards are communicated during the HSE Communication broadcast over all radio channels at shift start.</p> <p>Dedicated Security Coordinator hired in October 2018 to put more emphasis on security aspects of our operations, including traffic control</p>	
13.9.2	<p>To assess potential changes to TLU that could potentially derive from implementation of the RRM, RRR will carry out, or provide financial support for, the following activities:</p> <ul style="list-style-type: none"> <li>• Subject to any terms of agreement with the local First Nations and Métis, periodically update Traditional Knowledge (TK) studies conducted for the RRM beginning five years after mine operations initiate, to determine if there have been any changes to resource harvesting patterns by local Aboriginal peoples as a result of the RRM, and the reasons for any such changes</li> <li>• Conduct reviews at five year intervals, of the activities of a subset of RRR Aboriginal employees (representative cross section) to determine the effects of employment on their traditional activities</li> <li>• Confirm any expected changes in the availability of fisheries and wildlife resources to local harvesters, based on data derived from biological monitoring programs.</li> </ul>	No updates were conducted in 2019.	Ongoing
13.10.2	<p>RRR will carry out the following monitoring program to ensure the protection of cultural heritage resources</p> <ul style="list-style-type: none"> <li>• Maintain a record of all cultural heritage resources known to occur in the vicinity of planned RRM developments, such that intrusion</li> </ul>	<p>NG engaged qualified Archaeologists and Built Heritage Specialists to record all resources prior to construction commencing.</p> <p>NG continues to actively engage local residents and Indigenous groups through meetings and visits.</p>	Ongoing

Condition/ Tracking #	Description	Status 2019	Date Completed
	<p>or damage to such resources can be avoided during construction, recognizing and respecting confidentiality limitations</p> <ul style="list-style-type: none"> <li>• Maintain an active dialogue with local residents and Aboriginal group representatives, having knowledge of specific areas prior to and during major construction activities, to provide guidance to supervisory staff on the likely or possible occurrence of as yet undocumented cultural heritage sites</li> <li>• Enlist the services of a trained archaeologist during the conduct of major construction works to support RRR as needed, where there is a reasonable potential for encountering as yet undocumented cultural heritage sites</li> <li>• Enlist the services of Elders or other cultural advisors in the event that cultural heritage resources are encountered (in addition to meeting all Regulatory requirements)</li> <li>• Conduct a post-construction assessment of the state of known cultural heritage sites in the vicinity of RRM activities / structures to confirm the integrity of such resources.</li> </ul>	<p>Northwest Archaeological Assessments under the guidance of qualified archaeologist Andrew Hinshelwood, completed analysis and cataloguing of artifacts discovered during the 2018 Stage 4 excavation on the southwestern edge of the mine site.</p> <p>Preliminary reports for both excavation sites plus the final report for the smaller excavation site were submitted to the Ontario Ministry of Tourism, Culture and Sport (MTCS) - Archaeological Programs Unit, for review and acceptance into the Ontario Public Register of Archaeological Reports. NG agrees to enlist the services of Elders should new Cultural Heritage resources be discovered.</p> <p>NG contracted post construction assessment of known Cultural Heritage sites in 2018; reporting was completed in 2019. Original post construction assessment report was submitted on May 2/2019 to MTCS; revised report was submitted on Aug 16/2019.</p>	
13.11.2	<p>RRR will carry out the following monitoring program to ensure the documentation of cultural heritage landscapes and built heritage resources as appropriate:</p> <ul style="list-style-type: none"> <li>• Develop an initial record of all cultural heritage landscapes and built heritage resources known to occur near the planned RRM developments, such that intrusion or damage to such resources can be documented; and</li> <li>• Conduct a post-construction assessment of the state of known cultural heritage landscapes and built heritage resources in the vicinity of RRM activities / structures to confirm the status of such resources.</li> </ul>	<p>The initial record was completed by Untermann and McPhail. Untermann and McPhail began a post-construction assessment of the state of known cultural heritage resources in 2018 and the completed report was submitted to MTCS On May 2, 2019, in fulfillment of this requirement. Copies of the report were also distributed to Rainy River Public Library, Fort Frances Public Library, Lakehead University Library, Emo Public Library, Chapple Township and the Chapple Museum. MTCS requested revisions; the revised report was submitted on Aug 16, 2019.</p>	Ongoing

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13.12.2	<p>Traffic flow on local roads with more limited capacity is of greater interest, notably:</p> <ul style="list-style-type: none"> <li>• Highway 600;</li> <li>• Teeple Road west of Highway 71; and</li> <li>• The East Access Road.</li> </ul> <p>The intent is to document that these local roads are able to continue to function adequately, and within safe limits for both project and local traffic. Methods for measuring traffic use along local roads will include:</p> <ul style="list-style-type: none"> <li>• Periodic traffic count surveys using automated traffic counters;</li> <li>• Employee surveys to determine transport routes to and from the mine site; and</li> <li>• Ongoing discussions with MTO and the Township of Chapple to support additional traffic volume monitoring studies if appropriate.</li> </ul>	<p>The Ontario Provincial Police request that New Gold share any traffic complaints with them. New Gold continues to monitor traffic and work closely with the Township of Chapple to address any concerns. The East Access Road (Korpi Road) is the primary route of traffic to the mine site, greatly reducing traffic on Teeple Rd/Hwy 600. New Gold also provides bus transportation for employees to/from Fort Frances and Emo.</p>	Ongoing
13.13.2	<p>Methods for documenting accommodations use in association with the RRM will include conducting contractor and employee surveys to determine:</p> <ul style="list-style-type: none"> <li>• Community or nearest community of local residence;</li> <li>• Type of residence (rental or ownership);</li> <li>• Type of accommodation (existing or new);</li> <li>• Type of occupancy (single, shared or family); and</li> <li>• Whether or not the employee / contractor is an existing local resident, or new to the area.</li> </ul>	<p>New Gold Rainy River is a residential operation with a limited number of positions being accommodated at its temporary camp.</p> <p>As of December 31, 2019, 67% of New Gold employees were from the local human environment regional study area.</p> <p>New Gold provides accommodation for contractors on the site and a limited number of professional and operational staff when local hiring is not possible.</p>	Ongoing
13.14 A	<p>It is anticipated the environmental management system will consider the following areas as significant environmental aspects of the RRM (although they may not be represented by individual management plans depending on the final environmental management system framework):</p>	<p>In 2019, the development of an ISO 14001 compliant Environmental Management System (EMS) was completed for the Rainy River Mine (RRM). The EMS design framework does include the following areas as significant environmental aspects and are either stand-alone Management</p>	Ongoing

Condition/ Tracking #	Description	Status 2019	Date Completed
	<ul style="list-style-type: none"> <li>• Recycling and waste reduction program;</li> <li>• Mine rock (PAG / NPAG) management;</li> <li>• Water management;</li> <li>• General waste management;</li> <li>• Hazardous materials management;</li> <li>• Fuel handling and storage;</li> <li>• Fugitive dust management;</li> <li>• Sound management;</li> <li>• Wildlife management;</li> <li>• Traffic management;</li> <li>• Cultural awareness;</li> <li>• Heritage management;</li> <li>• Emergency response; and</li> <li>• Response to malfunctions and accidents.</li> </ul>	<p>Plans or a subset to a core Management Plan:            Recycling and waste reduction program;            Mine rock (PAG / NPAG) management;            Water management;            General waste management;            Hazardous materials management;            Fuel handling and storage;            Fugitive dust management;            Sound management;            Wildlife management;            Traffic management;            Cultural awareness;            Heritage management;            Emergency response;            Response to malfunctions and accidents.</p>	
13.14 B	<p>Environmental management system maintenance and effectiveness will be monitored through a variety of programs, such as:</p> <ul style="list-style-type: none"> <li>• Formal and informal audits;</li> <li>• Environmental monitoring;</li> <li>• Non-conformance incidents, status of corrective actions; and</li> <li>• Stakeholder feedback.</li> </ul> <p>Periodic management reviews will be completed to consider changing circumstances which could affect the continued suitability and adequacy of the plans, and to support continual improvement in overall effectiveness.</p>	<p>In 2019, the development of an ISO 14001 compliant Environmental Management System (EMS) was completed for the Rainy River Mine (RRM).            EMS maintenance and effectiveness will be monitored through audits, environmental monitoring, non-conformance incidents, status of corrective actions and stakeholder feedback.            Periodic management reviews will support continuous improvement.</p>	Ongoing