



# Appendix C

## Commitments Registry



Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
1	<p>The Rainy River Project (RRP) will monitor and mitigate air emissions, particularly dust, through implementation of current industry best management practices.</p>	<p>Air quality monitoring program consists of two air quality sampling stations that were established in May 2015. The sampling stations are operated by New Gold staff with maintenance and data analysis conducted by consulting services.</p> <p>Dust mitigation measures utilized during 2016 included water application to roads, laydowns and quarry areas, and calcium application to roads.</p>	<p>Air Quality Stations installed in May 2015.</p> <p>Monitoring is ongoing for life of mine.</p>
2	<p>A fugitive dust best management practices plan will be prepared to identify all potential sources of fugitive dusts, outline mitigation 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>Best practices were implemented in 2016 through water application to roads, laydowns and quarry areas.</p> <p>Calcium application was done to all high traffic roads. Record keeping for all applications.</p>	<p>ECA Application Submission - November 14th 2014;</p> <p>Fugitive Dust Best Management Plans Submitted February 4, 2016;</p> <p>Updated Water Use Plan for Dust submitted December 14, 2016</p>

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3	<p>Sound will be monitored during construction, operations and active closure phases consistent with Ministry of the Environment and Climate Change (MOECC) requirements</p>	<p>Sound monitoring happened at five residential monitoring stations and two Whip-poor-will monitoring stations. Exceedances of the hourly energy equivalent sound level (L<sub>EQ</sub>) were mostly caused by natural activities such as birds chirping and vehicle passbys, etc.</p> <p>There were however periods during monitoring where the sound levels were impacted by the Coreshack and Highway 600 construction activities. Highway 600 construction was completed in 2016.</p> <p>Despite the L<sub>EQ</sub> sound level exceedances, the average sound pressure level that exceeded 90% of the time for that hour (L<sub>90</sub>) was within the criteria limits during day, evening and night times.</p>	Ongoing
4	<p>NG (NG; previously Rainy River Resources) expect that the monitoring required will include: total suspended particulate (TSP) and metals on the TSP size fraction, PM10, dustfall and passive monitoring for NO<sub>2</sub> and SO<sub>2</sub>. NG commits to conducting this monitoring which is also expected to be an approval requirement.</p>	<p>Air quality monitoring at two locations on the project site was initiated in May 2015 and remains in effect. New Gold submitted the Ambient Air Quality Monitoring Plan to MOECC in 2016. MOECC also conducted one inspection of the monitoring stations in July 2016 and found no significant issues with the station installation or operation.</p>	<p>Ambient Air Quality Plan submitted February 2016 and approved by MOECC in November 2016.</p>

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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.	Completed and was included as part of Provincial ECA application. The final version of the Fugitive Dust Management Plan for operations and for construction was submitted to MOECC in 2015 and implemented during 2015 (early construction phase).  As per condition 5(11) of ECA No. 5178-9TUPD9 an updated Management Plan of water used for dust suppression and other industrial uses was submitted to MOECC in December 2016.	ECA Application Submission - November 14, 2014;  Fugitive Dust Best Management Plans Submitted February 4, 2016;  Updated Water Use Plan for Dust submitted December 14, 2016
6	A transboundary notification under the Canada - U.S. Air Quality Agreement will be filed prior to operation.	Completed. A notification was filed in 2014.	September 17, 2014
7	Planning measures aimed at reducing fuel and power consumption for the RRP site include the following: • Using larger, more fuel efficient trucks for material transport; • Using optimum insulation in buildings to reduce heat loss and heat recovery from equipment where practical; and • Maintaining site equipment and vehicles in good working order through regular preventative maintenance.	No specific measures were implemented during 2016 to reduce fuel and power consumption included apart from utilization of good operating practices.  The Maintenance Program was refined during 2016 which implemented a better forecast structure for equipment. This change impacted the regular preventative maintenance.	Ongoing

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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 has been ongoing at the RRP since May 2015. Two air quality sampling stations were established in May 2015: one to the south of the Site near the beginning of the Highway 600 re-route on Tait Road, and one to the east of the Site on Gallinger Road.</p> <p>During 2016 there were three air quality exceedances; April 30 a recorded concentration exceedance of Total Suspended Particulate 20µg/m<sup>3</sup> over the Canadian Ambient Air Quality Standard. The Annual Air Quality Report identifies the cause as road dust.</p> <p>The other exceedances occurred on May 6 and were double the standard for particulate matter (28µg/m<sup>3</sup>) which Annual Air Quality Report identifies the cause as forest fires burning north of the project and not as a result of project related activities.</p>	Ongoing
9	Sound mitigation measures will be used, such as selection of quieter equipment. Implementation of sound abatement strategies to dampen sound infiltrating habitats and migratory bird nesting areas surrounding high traffic areas of the mine.	<p>Measures that were implemented during 2015 and continued into 2016 to reduce sound during the construction phase included:</p> <ul style="list-style-type: none"> <li>• specific trucks that allow exhaust to pass through the truck box rather than directly through the exhaust pipe (can muffle sound)</li> <li>• reducing size of blasts where appropriate</li> <li>• tree buffers maintained where practical.</li> </ul>	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 RRP.	Not applicable to 2016 Construction and Baseline Phase.	N/A
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 RRP blasting operations will be reassessed in a detailed study to confirm that the predicted levels are within guideline limits.	On average the maximum charge size per delay for blasting is 350 kg, well below the limit set out.	Ongoing

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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>New Gold RRP established a neighbour committee in 2015 to provide information to surrounding residents regarding construction work at the site. Quarterly newsletters and other notices with respect to construction activities were mailed out district wide.</p> <p>In addition:</p> <ul style="list-style-type: none"> <li>• New Gold RRP delivered contact information to all neighbours to ensure they had means to contact the company if any concerns.</li> <li>• Blasting updates were provided to neighbours. A vibration monitoring program was also instituted in 2015.</li> </ul> <p>In 2016, New Gold RRP was contacted by several neighbours, living on Highway 600, who had concerns about road dust as a result of increased traffic. New Gold RRP contacted Emcon, the MTO roads contractor, to ensure dust suppressant was placed on the road at more regular intervals.</p>	Ongoing

<p><b>13</b></p>	<p>Collectively and individually, the processes and water management strategies proposed for the RRP 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"> <li>• Use of the in-plant SO<sub>2</sub>/Air process for cyanide destruction and metal precipitation, as well as to extended post SO<sub>2</sub>/Air treatment effluent aging in the TMA (TMA) and water management ponds, followed by constructed wetland treatment;</li> <li>• Detailed plans and designs to manage potentially acid generating rock (PAG) on site, including ongoing progressive reclamation at the stockpile to limit acid generation, with drainage from this stockpile reporting to the mine rock pond, for re-use as part of the mill process water supply thereby reducing fresh water requirements. Dissolved metals associated with east mine rock stockpile drainage would ultimately report to the process plant SO<sub>2</sub>/Air and hydroxide precipitation circuit, and then to tailings;</li> <li>• Use of emulsion and/or emulsion blend explosives as a means of limiting ammonia residuals from the use of blasting agents at source; and</li> <li>• Collection of site runoff and seepage as per MMR (MMER), and to maximize the use of near 100% contact water recycle for the processing plant water supply.</li> </ul>	<p>During 2016 a key focus on environmental management continued to be water management, suspended solids control, and ammonia control.</p> <p>There was no processing / requirement for cyanide control during 2016. A Geochemical Monitoring Plan for the Construction and Operation Phases was issued in accordance with MOECC approval requirements, and has been implemented at the RRP site. Monitoring is ongoing.</p>	<p>Ongoing</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 2016 surface water was diverted from stockpiles via temporary ditching systems. Due to construction setbacks associated with permitting delays the completion of permanent open pit dewatering systems caused the project to develop temporary in pit sumps to handle runoff. Water contained within these sumps was sampled as per ECA and MMER requirements and when necessary treated for suspended solids and ammonia.</p> <p>In October 2016 New Gold RRP submitted a Notice of Modification to MOECC to install a temporary ammonia treatment facility in the open pit which became operational in December 2016.</p>	Ongoing
15	Open pit dewatering water will be contained and if necessary, treated before it is discharged to the environment.	<p>During 2016 surface water was diverted from stockpiles via temporary ditching systems. Due to construction setbacks associated with permitting delays the completion of permanent open pit dewatering systems caused the project to develop temporary in pit sumps to handle runoff. Water contained within these sumps was sampled as per ECA and MMER requirements and when necessary treated for suspended solids and ammonia.</p> <p>In October 2016 New Gold RRP submitted a Notice of Modification to MOECC to install a temporary ammonia treatment facility in the open pit which became operational in December 2016.</p>	Ongoing

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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.	Not applicable during 2016 Construction Phase.	N/A
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.	Not applicable during 2016 Construction Phase.	N/A
18	Pit lake water quality will be monitored regularly as part of the post-closure monitoring program.	Not applicable during 2016 Construction Phase.	N/A
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.	Not applicable during 2016 Construction Phase.	N/A

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20	<p>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 possibly acid generating (PAG) materials.</p>	<p>The design and construction of temporary structures in accordance with this commitment was initiated during 2015 and continued in 2016.</p> <p>The ECA application was more flexible, stating that they are designed to provide a minimum 12-day retention time without the use of coagulant / flocculent, or a minimum of 3 days if coagulant / flocculent is used. The Provincial ECA provides greater flexibility and allows that coagulant / flocculent to be used if needed / as applicable.</p> <p>As the project advances in 2017 the need to establish PAG stockpiles will come into effect and appropriate systems will be constructed.</p>	Ongoing
21	<p>The retention time for sediment ponds 1 and 2 has been increased to 12 days, subject to review and acceptance by the MOECC.</p>	<p>Design of structures in accordance with this commitment was initiated during 2015 or as refined through the Provincial environmental approval process.</p> <p>During 2016 temporary ponds were constructed to capture runoff from small overburden piles. The construction of the permanent Sediment Ponds 1 and 2 is scheduled for 2017.</p>	Ongoing

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22	<p>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.</p>	<p>During 2016 the interim Mine Rock Pond was constructed however permitting setbacks did not allow for the construction of the permanent Mine Rock Pond.</p> <p>The need to manage PAG drainage and provide water for the process plant was not required in 2016, as the project was still in its Construction Phase.</p> <p>Moving into 2017 an LRIA approval from the MNRF will be necessary to complete the Mine Rock Pond. Construction of the Mine Rock Pond will begin when the LRIA approval from MNRF is received.</p>	Ongoing
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>A Geochemical Monitoring Plan for the Construction and Operation Phases was issued in accordance with MOECC ECA 5178-9TUPD9 requirements, and has been implemented at the RRP site.</p> <p>Monitoring was ongoing during 2016.</p>	<p>Ongoing</p> <p>Geochemical Monitoring Plan submitted to MOECC January 15, 2016.</p>

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	<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><b>23 cont</b></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 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.</p> <p>Periodic confirmation analysis will be conducted during the (open pit)</p>	<p>Completed. A Mine Rock and Overburden Management Plan was included in the filed Closure Plan (as Appendix J).</p>	<p>February 20, 2015</p>

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	<p>stripping program to ensure that the initial interpretation of the thickness of till requiring handling as PAG remains accurate.</p> <p>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"> <li>• Runoff and seepage related to tailings and stockpiles will be monitored as per surface and groundwater monitoring;</li> <li>• Blast hole sampling from open pit operations for mine rock segregation will be carried out throughout the open pit operations phase;</li> <li>• Tailings samples will be collected at regular intervals during the mine operations phase; and</li> <li>• Field trials will be carried out during all or a portion of the mine construction and operations phases as required to</li> </ul>	<p>A Geochemical Monitoring Plan for the Construction and Operation Phases was issued in accordance with MOECC ECA 5178-9TUPD9 requirements, and has been implemented at the RRP site. Monitoring was ongoing during 2016.</p> <p>To date no tailings have been produced or additional geochemical field trials initiated.</p>	<p>Geochemical Monitoring Plan submitted to MOECC January 15, 2016.</p>

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	generate data need to confirm modeling results.		
<b>25</b>	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.	In 2016, little PAG was encountered. Of the PAG that was found, all of it was placed within the mine footprint to support shovels and within haul roads.	Ongoing
<b>26</b>	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.	<p>During 2016 mine rock and overburden piles did not require rehabilitation.</p> <p>Some rehabilitation in the form of shaping and compaction occurred at the topsoil salvage piles in the Water Management Pond area.</p> <p>Moving into Operations, wherever reasonable areas will continue to be rehabilitated, re-seeded and used for future reclamation</p>	Ongoing

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27	Encapsulation of the east mine rock stockpile under a multi-layered cover is proposed with a long term goal of controlling ARD.	Not applicable during 2016 Construction Phase.	N/A
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.	Kinetic cells are ongoing as required to support predictions. As of December 31, 2016 the following remained active: <ul style="list-style-type: none"> <li>• Seven laboratory kinetic tests</li> <li>• Three waste rock humidity cells</li> <li>• Two tailings humidity cells</li> <li>• Two tailings columns; and</li> <li>• Ten field cells.</li> </ul>	Ongoing
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.	Not applicable during the Construction Phase of 2016.  In addition, no run-of-mine stockpile was present during 2016.	N/A

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30	<p>Site runoff and seepage will be collected, managed and treated per the Provincial and MMER requirements.</p>	<p>Completed as required during 2016 in accordance with Provincial approvals (including ECA 5781-9VJQ2J and 5178-9TUPD9) and the MMER.</p> <p>During 2016 contact water was only generated on the plant site and in the open pit. Sampling and discharge met ECA approvals requirements.</p> <p>In 2016 surface water was monitored on and off site as per the monitoring program.</p> <p>Discharges met the environmental approval requirements, with the exception of:</p> <ul style="list-style-type: none"> <li>• Ten instances of elevated total suspended solids concentration,</li> <li>• Five unionized ammonia exceedances in mine water from the Open Pit,</li> <li>• One instance of Dyno Totan 1000 Emulsion spilled to ground due to a procedural error, and</li> <li>• One instance of MMER acute toxicity of rainbow trout where a causation analysis was completed and determined inconclusive.</li> </ul> <p>More information can be found in Appendix A Condition 3.</p>	<p>Ongoing</p> <p>Sediment Releases in 2016:            Clark Creek – 8 March 2016            Teeple Dam Failure – 21 March 2016            Pinewood River Pumphouse – 28 March 2016            In Pit Sump 3 – 15 April 2016            Plant Site Treatment System – 19 April 2016            South Runoff Pond – 30 June 2016            West Creek Lower Diversion Plug – 8 July 2016            In Pit Sump 3 – 27 July 2016            Overburden/West Mine Rock Stockpile Temporary Sediment Pond 2 – 8 October 2016            Plant Site Treatment System – 27 November 2016</p>
31	<p>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.</p>	<p>This continues to be one of RRP Operating Strategies.</p>	<p>Ongoing</p>

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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	These structures remained under construction during 2016. Permit approvals to finish the structures were obtained in late 2016 and New Gold RRP intends to complete the work in 2017.	Ongoing
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 diversion system was in construction and managed in compliance with this commitment in 2016. The finished diversion structure will meet the terms of this commitment.	Ongoing
34	West Creek Diversion will be positioned far enough from the pit perimeter to ensure integrity and stability and is expected to provide like-for-like fish habitat replacement.	The diversion system was constructed and managed in compliance with this commitment in 2016. The finished diversion structure will meet the terms of this commitment.	Ongoing
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.	Detailed design is consistent with this commitment.	N/A

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36	There will be secondary containment in place for tailings and contact water pipelines at the crossing of West Creek.	During 2016 double contained tailings pipelines were drilled underneath West Creek however no tailings were generated in 2016 as the project was still in the Construction Phase.	N/A
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.	Detailed design during 2016 was consistent with this commitment. The process plant is under construction and did not require water inputs during 2016.	ECA No. 5178 9TUPD9 valid until September 1, 2026 outlines the water recycle system that will be implemented on the project.
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.	Water was taken for a limited time from the Pinewood River in August and September 2016 for the purpose of testing the pumping system. No water has been taken at this time to establish a water inventory.	Ongoing
39	Water recycle will be maximized, using approximately 100% water recycle for the processing plant water supply.	Detailed design during 2015 and 2016 was consistent with this commitment. The process plant was under construction and did not require water during 2016.	ECA No. 5178 9TUPD9 valid until September 1, 2026 outlines the water recycle system that will be implemented on the project.
40	Local area lakes will not be used for process water supply for the RRP.	There are no plans to take water from local lakes and none was taken during 2016.	Complete

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41	<p>All process reagents and materials, and wastes, will be handled and stored responsibly, according to supplier and safety guidance, regulatory requirements and industry best practices.</p>	<p>During 2016 New Gold RRP implemented a process where all Material Safety Data Sheets for new materials be reviewed by the Environmental Department prior to being brought to site.</p> <p>The project was in the Construction Phase during 2016 and the need for process reagents was not required. RRP is in the process of establishing and maintaining a site wide Hazardous Waste Inventory as an ongoing activity.</p>	Ongoing
42	<p>Any chemical spills within the process plant / chemical storage areas will be controlled through provision of secondary containment as appropriate, and will not enter the environment. Spills of potentially hazardous materials during transport, or from on-site material storage and handling facilities will be managed. Measures will be taken to prevent and clean up any hydrocarbon spills (and other spills) at source to ensure such materials do not enter surrounding waters as practical. Spills will be reported to the MOECC and other appropriate agencies per the requirements of the Ontario Environmental Protection Act.</p>	<p>During 2016 the process plant was still under construction therefore the potential of hazardous material spills was not applicable.</p> <p>New Gold RRP has implemented a site wide policy for spill cleanup and spill reporting and has purchased appropriate spill response materials to handle hydrocarbon and other potentially hazardous material spills.</p>	Ongoing

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43	<p>The TMA dams will meet strict regulatory requirements including the requirements of the Provincial Lakes and Rivers Improvement Act (LRIA) 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>	<p>During the course of construction of the water and tailings management facilities, deformations were identified at one of the dams associated with such facilities. As a result, work on those facilities was paused in February 2016. Additional geotechnical testing and follow up monitoring were implemented.</p> <p>After receiving feedback from New Gold's Independent Tailings Review Board (a panel of independent experts established by New Gold in line with best practices in Canada) and MNRF, the water management structures on the site were redesigned. The redesign, together with enhanced construction procedures, including an enhanced QCV/QA program, were approved by MNRF in November 2016 following which construction was recommenced.</p>	LRIA 2015-04C obtained November 2016
44	<p>Runoff and seepage from the TMA and stockpiles will be captured, monitored, and either released to the environment if applicable criteria are met and/or re-used in the process plant during operations.</p> <p>Cyanide and metal concentrations in the TMA seepage and all treated effluent discharges to the environment will be controlled through the use of in-plant cyanide destruction and heavy metal precipitation, augmented by extended effluent aging in the TMA ponds.</p>	<p>Detailed design during 2016 was consistent with this commitment. Construction of the TMA dams was initiated in part during 2015 but the TMA was not in operation in 2016.</p> <p>Temporary collection systems have been installed for stockpiles (where applicable) and will be improved upon and made permanent as the project advances in 2017.</p>	N/A

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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.	During 2016 pipeline installation on the project commenced however none of the lines were active during the Construction Phase of 2016. Some pipelines were hydro tested as part of the commissioning phase for periods of less than one hour using clean water.	N/A
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.	Not applicable during 2016 Construction Phase. Detailed designs are consistent with this commitment.	N/A
47	<p>NG commits to maintaining the deposited tailings during the post closure period in a saturated condition in perpetuity to prevent the generation of ARD.</p> <p>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.</p>	Not applicable during 2016 Construction Phase. Detailed designs are consistent with this commitment.	N/A

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48	The thickness and maintenance of water cover over the TMA will be clarified in the Closure Plan.	Complete. The thickness and maintenance of water cover over the TMA was clarified in the Closure Plan filed in 2015.	February 20, 2015
49	<p>A detailed monitoring plan will be developed as part of the Provincial closure planning process to ensure that the deposited tailings solids remain permanently saturated in the post-closure condition. This plan will include consideration of the low permeability overburden perimeter cover bordering the tailings dams to ensure that the deposited tailings beneath the perimeter overburden cover remain saturated, or alternatively that the overburden zone cover itself remains sufficiently saturated so as to prevent oxidation of the underlying tailings. The monitoring program will consist of the following principal elements:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• Establishment of a water level monitoring station within the tailings pond, near to the spillway, with measurements to be taken at regular intervals;</li> </ul>	The monitoring plan was detailed in the Closure Plan filed in 2015 and will be modified as appropriate in future Closure Plan Amendments. Closure Plan Amendments will occur during operations and as additional information becomes available.	February 20, 2015

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49 cont	<ul style="list-style-type: none"> <li>• Establishment of a series of piezometers positioned around the TMA overburden zone perimeter that would measure water levels within both the overburden and the underlying deposited tailings, with such piezometers to be fitted with data loggers that would take continuous water level measurements at approximately daily intervals;</li> <li>• Updating the hydrological data for analyses of the TMA basin at a point approximately two years prior to implementing final closure of the TMA to confirm, or modify, applicable water balance parameters;</li> <li>• Undertaking an updated review of climate change scenarios at a point approximately two years prior to implementing final closure of the TMA to confirm, or modify, anticipated future hydrological conditions related to climate change scenarios; and</li> <li>• Annual reviews of water cover performance.</li> </ul>	<p>The monitoring plan was detailed in the Closure Plan filed in 2015 and will be modified as appropriate in future Closure Plan Amendments.</p> <p>Closure Plan Amendments will occur during operations and as additional information becomes available.</p>	February 20, 2015

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
50	<p>In the event that observed water levels within the TMA pond were to decline to a level where there was a risk of the deposited tailings solids becoming partially unsaturated for extended periods, the available contingencies to mitigate that condition would be the following:</p> <ul style="list-style-type: none"> <li>• 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);</li> <li>• 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</li> <li>• Raising the dam crest, as well as the spillway invert to further increase the depth of the TMA water cover.</li> </ul> <p>In development of the above contingencies, trigger levels would be developed for implementation of the contingencies.</p>	<p>The detailed design for the TMA is consistent with these commitments however this condition was not applicable during 2016 as the TMA has not been fully constructed and the project has not generated any tailings.</p>	N/A

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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"> <li>• Extensive contact water recycling for process plant needs to reduce overall water demands and to minimize final effluent discharge volumes to the Pinewood River;</li> <li>• Use of SO<sub>2</sub>/Air treatment for cyanide destruction and heavy metal precipitation in the process plant followed by extended effluent aging in the TMA pond and in the water management pond to achieve the highest quality effluent reasonably achievable;</li> <li>• Use of a constructed wetland system for final effluent polishing of a major portion of the discharge;</li> <li>• Management of the site for ARD control during operations and following closure to prevent adverse water quality impacts to the Pinewood River;</li> <li>• The DFO (DFO) Freshwater Intake End-of-Pipe Guidelines will be followed as mitigation for potential fisheries effects associated with water intakes;</li> <li>• Construction of the Pinewood River Highway 600 re-alignment crossing (bridge or culverts) in a manner that does not restrict fish passage;</li> <li>• Maintaining current fish habitat productivity; and</li> <li>• Implementation of an extensive monitoring plan for water quality and flow discharges, and receiving water aquatic life and habitat.</li> </ul>	<p>The detailed design during 2016 was consistent with these commitments. Only the following commitments were applicable, and accordingly fulfilled or addressed during detailed design activities during 2016:</p> <ul style="list-style-type: none"> <li>• The DFO (DFO) Freshwater Intake End-of-Pipe Guidelines were implemented and followed as mitigation for potential fisheries effects associated with water intake at the Pinewood River.</li> <li>• The Construction of the Pinewood River Highway 600 re-alignment crossing consisted of a clear span bridge that does not impact fish.</li> <li>• Maintaining current fish habitat productivity; and</li> <li>• Implementation of an extensive monitoring plan for water quality and flow discharges, and receiving water aquatic life and habitat.</li> </ul>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
52	<p>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.</p>	<p>The operational detailed design for the RRP is consistent with this commitment. There are currently nine temporary discharge points for surface water effluent that report to the Pinewood River. The discharges are batch, not constant discharges, and are measured using flow meters. Water quality is sampled weekly or every discharge and assessed against provincial and federal water quality requirements.</p> <p>Construction of the Constructed Wetland was not initiated during 2016.</p>	Ongoing
53	<p>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.</p>	<p>The detailed design is consistent with this commitment. There were 75 Project related effluent discharges in 2016. Effluent was treated with flocculent and dry ice to reduce total suspended solids and un-ionized ammonia, respectively.</p> <p>All effluent met the environmental approval requirements with the exception of:</p> <ul style="list-style-type: none"> <li>• Ten instances of elevated total suspended solids concentration,</li> <li>• Five unionized ammonia exceedances in mine water from the Open Pit, and,</li> <li>• One instance of MMER acute toxicity of rainbow trout from mine water from the Open Pit, where a causation analysis was completed and determined inconclusive.</li> </ul> <p>More information can be found in Appendix A Condition 3.</p>	<p>Ongoing</p> <p>Sediment Releases in 2016:            Clark Creek – 8 March 2016            Teeple Dam Failure – 21 March 2016            Pinewood River Pumphouse – 28 March 2016            In Pit Sump 3 – 15 April 2016            Plant Site Treatment System – 19 April 2016            South Runoff Pond – 30 June 2016            West Creek Lower Diversion Plug – 8 July 2016            In Pit Sump 3 – 27 July 2016            Overburden/West Mine Rock Stockpile Temporary Sediment Pond 2 – 8 October 2016            Plant Site Treatment System – 27 November 2016</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
54	Minimize the number of final effluent compliance points as reasonable.	<p>Through 2016, there were nine final effluent compliance points that were and continue to be registered. Of the nine however only 5 are used on a regular basis. None of the discharge points represent a constant discharge.</p> <p>During the Operational Phase the current design requires two final effluent discharge points, one at the Water Management Pond and one at the Pinewood Pumphouse.</p>	Ongoing
55	NG agrees to work with the MOECC 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 startup operations. Subject to approval(s), NG is proposing spring and open water flow thresholds of 10,000 m <sup>3</sup> /d and 5,000 m <sup>3</sup> /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, including Permit to Take Water (PTTW) 8776-9W2QN3.	PTTW 8776-9W2QN3 valid from August 31, 2015 to November 20, 2018.

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
56	The appropriateness of the use of the WSC station will be assessed as part of the operations planning, and if this station appears unsuitable, a separate dedicated flow monitoring station will be set up, either independently, or in association with the WSC.	A dedicated station was established on the Pinewood River on October 9, 2015 in consultation with the MOECC.	Station installation completed October 9, 2015
57	Optimize the timing and positioning of final effluent discharges to the Pinewood River so as to limit the potential for adverse flow effects to the river.	In 2016, there were nine final effluent discharge locations obtained through the Environmental Canada Metal Mining Effluent notification process. These discharges are included under the RRP Permits to Take Water from the MOECC to regulate the volume of water. Water quality is measured at the discharge for both Federal and Provincial regulation limits.	Ongoing
58	Subject to approval(s), NG is proposing to operate the final effluent discharge from both the Constructed Wetland and the pipeline discharge from the Water Management Pond, such that a minimum 1:1 receiver to final effluent mixing ratio would be maintained in the Pinewood River, with the understanding that receiver to final effluent mixing ratios of greater than 1:1 would be the norm.	The Provincial ECA 5178-9TUPD9 received from the MOECC is consistent with this commitment. These permanent discharge locations were not used during 2016 as the project was still in the Construction Phase.	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
59	<p>NG commits to the discharge of effluents to the Pinewood River in a manner that will achieve rapid mixing within the river.</p> <p>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 MOECC 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.</p>	<p>Not applicable during 2016 Construction Phase, however the installation of rock groynes has been discussed with the MNRF and New Gold RRP will be required to obtain appropriate permit approvals (LRIA) prior to installation planned for 2018.</p>	N/A

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
60	Scheduling of RRP development activities will consider environmental aspects, such as fish spawning.	<p>All in water work is conducted in accordance with MNRF permitting requirements which prohibit in water work during fish spawning windows. Furthermore, activities that do require in water work creating a loss of fish habitat have been compensated for by the recreation of fish habitat under Fisheries and Oceans Canada Approvals. Over the past two years of construction New Gold has obtained licenses from the MNRF to relocate fish species that could be impacted by in water work in areas where the company is authorized regardless of timing of year.</p> <p>In regard to the breeding bird window no clearing of mature timber or thick brush is conducted between May 1 and August 31, 2016 to protect breeding birds. Should equipment need to access grassy areas during the window bird sweeps are conducted by trained staff to ensure that no ground nesting birds are present. In 2016, bird sweeps for nests began on April 1st in preparation for the breeding bird window.</p> <p>Efforts, including placing netting to deter birds from nesting on equipment and materials, were made prior to April 1st 2016 to discourage nesting. In the event that a nest is discovered an appropriate buffer was maintained around the structure or equipment and the timing of activities is re-scheduled until the nest was abandoned.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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 RRP habitat losses.	The No Net Loss Plan and compensation strategy were finalized during 2015. Implementation was initiated during 2015 and continued in 2016, although the schedule for completion was delayed due to the changes in the construction schedule.	Ongoing
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.	Buffer zones are maintained at water crossing by reducing tree clearing, grubbing and equipment access.	Ongoing
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.	<p>In 2016, the RRP Fish Tissue Monitoring Program fish collection was conducted from September 19th to 24th. Fish communities and catchability for walleye and northern pike were generally consistent with the results of previous sampling efforts.</p> <p>The report found that the RRP has not had any influence on the concentrations of metals in muscle and liver tissues of the sentinel fish species. The 2016 report was finalized March 2017.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
64	<p>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 (MOECC and MNRF) would be informed and information related to increased health risks (if any) would be provided, as suggested.</p>	<p>Tissue sampling program was initiated in 2015, continued in 2016 and will continue in 2017. As above both northern pike and walleye were included in the studies. The 2016 report was finalized March 2017.</p> <p>To date there has been no effluent discharge from the constructed wetland to the Pinewood River and the reports have indicated that the RRP has not had any influence on the concentrations of metals in muscle and liver tissues of the fish. There has been no indication of increasing contaminant concentrations.</p> <p>The study will continue to be conducted on an annual basis and if contaminants increase over time New Gold will disclose this information to fulfill this commitment.</p>	Ongoing
65	<p>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.</p>	<p>Erosion and sediment control measures were provided in the various environmental approval applications, as applicable during 2016, including applications for approval under the <i>Lakes and River Improvement Act</i> and <i>Environmental Protection Act</i>.</p> <p>New Gold RRP implements erosion control measures through construction contracts, on site consulting assistance, regular inspections and field observations and installing temporary erosion control products where necessary.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
66	<p>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.</p>	<p>Not applicable as the pond dams were not fully constructed in 2016.</p> <p>Inspection frequencies and standardized inspection record sheets are included in the Operation, Maintenance and Surveillance Manual (OMS Manual) for the RRP. As the dams on the site are commissioned, the inspections will be completed as per this commitment and the OMS Manual.</p>	N/A
67	<p>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</p>	<p>Environmental monitoring was ongoing during 2016, consistent with all environmental approvals, environmental commitments and site management practices. Monthly surface water quality summaries are submitted to the MOECC as per ECA requirements.</p>	Ongoing
68	<p>Proposed (subject to modification to ensure participation and data sharing is adequate to meet the expectations of Aboriginal groups) surface water sampling program would include a First Nation training component followed by a rotating schedule whereby a First Nation representative would accompany NG staff on the monthly surface water sampling program. Laboratory results will be received by NG, reviewed and submitted to the identified individuals of each participating First Nation along with a summary explanation.</p>	<p>This program has not yet been fully instituted as yet. A preliminary training program took place in 2014 with the following participating: Couchiching, Naicatchewenin, Big Grassy River and Seine River First Nations (although all 16 First Nation communities were invited to participate).</p> <p>The Big Grassy River First Nation Environmental representative has been actively engaged with environmental monitoring at the site.</p> <p>Environmental Monitoring Boards with Aboriginal Groups were also established in 2016. The proposed program will be discussed at these boards.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
69	<p>Sampling of sediments will take place to evaluate soil quality parameters prior to undertaking any further closure activities for any contact water ponds and drainage works (including stockpile sediment ponds) where breaching is proposed.</p>	<p>A Topsoil Sampling Program was completed in 2016 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 the topsoil in Overall Benefit Lands.</p> <p>Additional sampling programs will be conducted as required.</p>	Ongoing
70	<p>NG staff is willing to describe the ongoing water quality program and provide freshet data on request. The water management plan for the RRP 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.</p>	<p>No requests were made in 2016.</p>	Ongoing
71	<p>There will be no sediment ponds associated with the aggregate pit(s).</p>	<p>There were no sediment ponds associated with the Roen Road Pit or Outcrop 3 during 2016. There is one sediment pond located adjacent to Outcrop 3 that is used to capture runoff from the equipment laydown.</p> <p>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; however, the quarry did not generate water during 2016 and the sump was not needed.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
72	<p>Related to the transmission line:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• No in-water work will be conducted and all poles will be placed above the high water mark;</li> <li>• Industry standard sediment interception and erosion control practices will be applied wherever appropriate / needed;</li> <li>• 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;</li> <li>• 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</li> <li>• Fueling and maintenance of vehicles will not occur within 50 m of surface waterbodies.</li> </ul>	<p>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 RRP conducted routine inspections and attended weekly construction meetings with the contractor.</p>	<p>Transmission Line Clearing Completed April 2016</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
73	<p>As a result of the independent First Nation review of the Final Environmental Assessment report, NG committed to a joint water quality monitoring and reporting program with the area First Nations (including Big Grassy River First Nation; BGRFN) as part of the existing monthly water quality monitoring program which is currently carried out by NG. The program will be funded by NG and form an integral part of the overall environmental management program as it relates to First Nations traditional knowledge and assurances of maintaining water quality and by extension, aquatic biota protection. The program will be developed jointly with the First Nations in lead-up to the initiation of mine construction. (Letter to Chiefs from Kyle Stanfield, October 2013).</p>	<p>This program has not yet been fully instituted as yet. A preliminary training program took place in 2014 with the following participating: Couchiching, Naicatchewenin, Big Grassy River and Seine River First Nations (although all 16 First Nation communities were invited to participate).</p> <p>The Big Grassy River First Nation Environmental representative has been actively engaged with environmental monitoring at the site throughout 2016.</p> <p>Environmental Monitoring Boards were also established in 2016. The proposed program will be discussed at these boards.</p>	Ongoing
74	<p>NG has committed to provide a program of close coordination with Rainy River First Nations in support of the pre-existing First Nation Watershed Program and water quality protection. Company funding will be provided as part of the fisheries compensation program to further water quality enhancement programs for the Pinewood and similar agriculturally impacted waterways.</p>	<p>New Gold RRP has a Participation Agreement with Rainy River First Nations. This program will be instituted in the future through the Environmental Monitoring Board.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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.	Not applicable as Clark Creek continued to flow through its native channel during 2016 and the PAG dump was not established.	N/A
76	Groundwater: to be monitored during construction, operations and active closure phases, with post active closure monitoring expected to continue for a decade (or more) at reduced frequencies pending ongoing analysis of data.	Groundwater wells were monitored throughout 2016, four times each, if not frozen.	Ongoing
77	A groundwater level (flow) and quality monitoring program of regular sampling and dipping of dedicated monitoring wells will be implemented to confirm that no area wells are affected by the mine. Furthermore, local well owners will be asked to participate in a well water quality program to monitor water quality in their wells.	Site Groundwater wells were monitored for levels and water quality four times each, when not frozen, in 2016. Data from 2016 was added to the Site Groundwater Database and reviewed for trends to quantify effects of dewatering and other RRP activities.  The Offsite Groundwater Well Monitoring Program was drafted in 2016 for release in 2017.	Ongoing
78	If water quality or availability in local wells is compromised (by the RRP), 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.	There were no impacts of the RRP on local offsite wells in 2016.	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
79	<p>If local artesian wells stop flowing (related to the RRP), NG will need to provide and install a pump to replace the artesian flow used by the homeowner.</p>	<p>There were no impacts of the RRP on local offsite wells in 2016.</p>	<p>Ongoing</p>
80	<p>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.</p> <p>This groundwater monitoring network may be amended or expanded through the MOECC 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>	<p>Installation of additional groundwater monitoring wells was initiated during 2015 and completed in 2016 in accordance with Provincial approval requirements.</p> <p>Groundwater wells were sampled four times each, if not frozen, during 2016. The program started in early 2016.</p>	<p>Ongoing</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
81	<p>Mitigation measures that will be used to reduce potential effects on groundwater include the following:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Using in-plant SO<sub>2</sub>/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;</li> <li>• 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;</li> <li>• Accelerating open pit inflow following mine closure, to the extent practicable, balancing the need for managing water quality and maintaining Pinewood River flows over the interim period until the pit can be completely flooded; and</li> <li>• Implementing a monitoring plan for water levels, water quality and flow discharges, and receiving water aquatic life and habitat maintenance.</li> </ul>	<p>The continued operation and construction of the RRP specific to the water management is consistent with this commitment:</p> <ul style="list-style-type: none"> <li>• Water from dewatering activities is treated, if required, to meet effluent quality regulations and released at licensed discharge locations.</li> <li>• The RRP is not yet in operation, therefore cyanide destruction is not applicable at this time</li> <li>• ARD is being managed in the PAG dump as committed to. Runoff from the PAG dump during 2016 reported to the Temporary Mine Rock Polishing Ponds, was treated as required, tested to meet effluent regulations and discharged to the environment.</li> <li>• The RRP is still in the Construction Phase therefore the requirements for mine closure are not applicable at this time.</li> <li>• Both Surface Water and Groundwater Monitoring Plans have been implemented and in place during 2016.</li> </ul>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
82	<p>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.</p>	<p>Monitoring of terrestrial systems and SAR during 2016 was compliant with environmental approvals and monitoring plan requirements.</p> <p>During 2015 New Gold RRP 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. During the spring months experienced ornithologists visit the site to complete SAR bird species monitoring.</p> <p>During fall 2016, a Deer Tissue monitoring program was implemented to study contaminant loadings in tissue.</p>	<p>SAR Bird Studies conducted in May and June 2016.</p> <p>Reporting on SAR and Wildlife Monitoring is completed as required as per condition 7.2(a) of Permit FF-C-001-14 under the Endangered Species Act was sent to MNRF.</p>
83	<p>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.</p>	<p>Complete.</p> <p>Samples were submitted to the Royal Ontario Museum and confirmed as common species. This information was provided to the resident.</p> <p>No further samples have been provided or discovered.</p>	<p>December 11, 2014</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
84	<p>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 MNRF once the report is complete and the report will be referred to in the Errata.</p>	<p>Complete.</p> <p>Surveys were completed during 2014 and a report issued. The report was referred to in the issued Errata for the EIS / EA Report.</p>	September 19, 2014

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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"> <li>• 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.</li> <li>• Annual monitoring of dust deposition on vegetation adjacent to mine roads; and</li> <li>• Active revegetation and encouragement of natural revegetation / recolonization of disturbed areas as part of progressive reclamation during operation and active reclamation at mine closure.</li> </ul>	<p>These mitigate measures have been in place since 2015 as applicable, including the use of water and calcium for dust suppression on roads.</p> <p>During the spring and summer of 2016 New Gold RRP also started to revegetate disturbed areas using native seed mixes and planting willows, dogwood, eastern white cedar, cattails and white pine.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
86	<p>In regards to the transmission line:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Access to the right of way (ROW) will be provided from existing infrastructure (some of which may need to be upgraded, as reasonable for personnel, material and equipment access), but no new permanent access roads are proposed. Generally, where access is poor, the ROW will be accessed along the ROW itself. Construction vehicles will not be allowed to travel through surface waters; and</li> <li>• Mechanical means will be used for periodic vegetation height maintenance along the transmission line, instead of herbicides.</li> </ul>	<p>Studies were completed during 2014 and the detailed design and construction plans are consistent with this commitment.</p> <p>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>	Completed

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
87	<p>Scheduling of RRP 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>The schedule of RRP construction activities during 2016 were consistent with this commitment. There was no tree clearing at all during May 1 to August 15.</p> <p>Clearing of the transmission line right of way was initiated in late November 2015 and completed by April 2016.</p> <p>The trees in the RRP area were surveyed by a bat biologist for bat activity. The trees to be cleared in the RRP area did not qualify for bat habitat.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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 behaviour 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 RRP incorporated wildlife awareness, avoidance and SAR information to the site orientation that is still delivered to all employees and contractors.</p> <p>Also during 2015 a no tolerance policy was implemented related to feeding and harassing wildlife onsite. This policy remains in effect.</p> <p>Regular site wide radio announcements remind employees about the importance of following this policy as well as reporting wildlife sightings.</p> <p>During 2016 New Gold RRP advanced the onsite wildlife reporting procedure and document 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>	<p>Implemented in 2015 and improved in 2016.</p> <p>Ongoing</p>
89	<p>All staff and contractors will be provided with training in animal encounters as part of the site orientation process.</p>	<p>The site orientation program includes information regarding wildlife awareness and wildlife encounters.</p> <p>Wildlife awareness information is also provided on an ongoing basis during field-based inspections of construction areas, in toolbox morning meetings and during morning radio announcements.</p>	<p>Ongoing</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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 RRP during 2016 were disposed of in an area of the project site with limited to no human interaction or buried (depending on the circumstance and animal).	Ongoing
91	A wildlife monitoring program will record the efficacy of these avoidance measures (will evaluate the effectiveness of the methods implemented) and annual reporting to EC and the MNRF will provide the information requested by the reviewer. New Gold will provide opportunities to Aboriginal groups to receive the annual reports.	In February 2016 a final version of the Wildlife Monitoring Program for the project was submitted to MNRF.  During 2016 aspects of the program were implemented including a deer tissue sampling program to assess natural metal accumulation in organ tissue.	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).
92	A more detailed wildlife follow-up monitoring plan will be developed through consultation with the MNRF 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 MNRF 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 RRP 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).

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
93	<p>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 MNRF and EC.</p>	<p>The use of exclusion fencing for reptiles and amphibians was considered during 2016, but during 2016 construction activities there was no apparent conflict and it was not considered needed.</p> <p>New Gold RRP obtains a scientific research license from MNRF each year which allows for the relocation of reptiles and amphibians that may be impacted by activities on site. During 2016 one snapping turtle required relocation from the Plant Site to a designated area outside of the project footprint.</p>	Ongoing
94	<p>In regards to the transmission line:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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</li> <li>• Should any nuisance wildlife be encountered which pose a risk to construction crews, the MNRF will be contacted for direction.</li> </ul>	<p>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 RRP Environmental department conducted regular inspections of the site to ensure these commitments were being followed.</p>	Construction Completed April 2016

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
95	<p>The primary mitigation strategies for limiting adverse effects to wildlife will include:</p> <ul style="list-style-type: none"> <li>• Preventing hunting from occurring on all lands owned by NG (required for the safety of workers; this is currently ongoing during exploration as well);</li> <li>• Maintenance to the extent practical of a 120 m buffer zone adjacent to rivers and creeks to protect watercourses and their associated vegetated margins;</li> <li>• Restoration of disturbed habitats at closure, including the development of habitats capable of supporting a diversity of wildlife species, including ungulates, large predators, furbearers and bats;</li> <li>• Enforcement of speed limits along proposed mine access roads to 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 to monitor the effectiveness of the proposed mitigation and additional mitigation measures will be implemented if necessary;</li> <li>• 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 behaviour or presence in proximity to the mine. Workers and contractors will be made aware of seasonal changes in local mammal behaviour or presence in proximity to the mine;</li> </ul>	<p>The following mitigation strategies applied to the 2016 construction year;</p> <p>Hunting did not occur on site except for required trapping of nuisance beavers.</p> <p>Buffer zones were maintained around fish bearing waterways and where necessary temporary erosion control products were installed.</p> <p>New Gold RRP has installed speed limit signs on project roads have implemented a site wide no tolerance policy for speeding which is enforced by radar.</p> <p>In 2016 wildlife crossing signs were installed at six locations on the project site in an attempt to reduce vehicle collisions with wildlife.</p> <p>Regular bulletins regarding wildlife are emailed and posted on site.</p> <p>Wildlife awareness training is provided to all contractors and employees during site orientation.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
95 cont	<ul style="list-style-type: none"> <li>• Treatment of the tailings 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);</li> <li>• Fencing the TMA to prevent access;</li> <li>• 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. The margins of the tailings pond will develop as wetland habitat;</li> <li>• Minimizing dust production along primary haulage routes by implementing dust suppression methods and thereby minimizing the RRP zone of influence; and</li> <li>• Disposing of food wastes generated on site in a manner that limit the attraction of wildlife, such as Black Bear and wolves.</li> </ul>	<p>Milling is scheduled to commence in 2017 at which time tailings will be produced and require treatment. At this time fencing of the TMA will be implemented.</p> <p>Dust is managed along haul roads using water and calcium.</p> <p>In late 2015 a Waste Management Program was implemented on site which included the hiring of a Waste Management Technician to implement the program.</p> <p>In 2016 the program was refined to better manage waste on the RRP. All general waste bins have locking lids and a regular disposal schedule has been established to reduce the amount of waste being temporarily stored on site. Special Bear Bins have also been installed to limit wildlife interaction with RRP waste.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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"> <li>• Development of a compact RRP site to reduce overall habitat loss and to limit potential adverse effects related to sound emissions to the extent practical;</li> <li>• Restricting the clearing of terrestrial amphibian breeding habitats to periods outside the amphibian breeding season as directed by the MNRF;</li> <li>• Implementation of sound abatement strategies to dampen sound infiltrating habitats surrounding high traffic areas of the mine;</li> <li>• Enforcement of speed limits along proposed mine access roads to reduce the potential adverse effects of increased vehicular traffic associated with the RRP. 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;</li> <li>• If frog mortality on roadways is found to be a problem along mine access roads or the re aligned Highway 600, silt fencing may be installed to prevent frogs from crossing the road and may direct them to the nearest culvert(s);</li> </ul>	<p>During the planning state of the project consideration into the size of the project site was taken into consideration and achieved as best possible.</p> <p>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.</p> <p>In 2015 New Gold RRP implemented and in 2016 continued site wide speed limits and a no tolerance to speeding policy which remains in effect.</p> <p>Wildlife crossing signs were also installed during 2016 on project roadways known for high concentrations of wildlife.</p> <p>Visual observations made along project roadways did not show and increase in frog mortality however a more regular monitoring program will be implemented in 2017.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
96 cont	<ul style="list-style-type: none"> <li>• 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 behaviour or presence in proximity to the mine;</li> <li>• 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;</li> <li>• 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;</li> <li>• Maintenance of generally abiotic conditions within the TMA to discourage wildlife presence; and</li> <li>• 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.</li> </ul>	<p>Wildlife awareness training is provided to all contractors and employees during site orientation. Bulletins and radio announcements regarding wildlife awareness are made throughout the year.</p> <p>2016 was the second year of construction on the project and the TMA and Mill were nonoperational therefore there are currently no tailings to treat or manage. As the project advances these factors will come into effect in the later part of 2017.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
97	Generally abiotic conditions will be created within the fenced TMA during operations to limit the interest of the pond to waterfowl.	2016 was the second year of construction on the project and the TMA and Mill were non-operational therefore there are currently no tailings to treat or manage. As the project advances these factors will come into effect in the later part of 2017.	N/A
98	Scheduling of RRP 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 2016 was in full consideration of environmental aspects and no known timing conflicts occurred.	Ongoing
99	A monitoring plan will be developed for Common Nighthawk and Eastern Whip-poor-will, in partnership with the MNRF, 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 MNRF and EC, and in consideration of conditions under the Net Benefit Permit being developed by the MNRF.	A monitoring plan was developed and implemented during 2015 and 2016 respectively, in accordance with ESA FF-C-001-14.	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
100	<p>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.</p> <p>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 MNRF once the report is complete. NG will provide opportunities to Aboriginal groups to receive the survey results.</p>	Complete	September 19, 2014

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
101	<p>The primary mitigation strategies for limiting adverse effects to birds and habitat:</p> <ul style="list-style-type: none"> <li>• Inclusion of wildlife awareness information into regular safety and environmental inductions performed by the mine. Wildlife sighting logs or information boards will be installed to notify workers of local observations. Workers will be made aware of seasonal changes in local animal behaviour or presence in proximity to the mine;</li> <li>• Minimizing the level of potentially disturbing activities near any known or subsequently discovered active raptor and raven nest sites until the nest is vacated;</li> <li>• Annual monitoring of the Bald Eagle nest in Woodland 122 to determine seasonal eagle activity at the nest site which will guide RRP 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;</li> <li>• Maintenance of a safe distance between RRP 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;</li> <li>• 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;</li> </ul>	<p>The following mitigation strategies for limiting adverse effects on birds and habitat were implemented during 2016;</p> <p>Inclusion of wildlife awareness information in site wide health and safety bulletins and employee orientation has been implemented since 2015.</p> <p>Wildlife logs have been placed in lunch rooms and a site wide protocol is in place to report wildlife sightings to the security department via radio communication.</p> <p>Bear awareness training was also provided to interested staff in 2016.</p> <p>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.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
101 cont	<ul style="list-style-type: none"> <li>• Environmental induction programs and ongoing environmental updates provided to workers will make them aware of Bald Eagle nesting activities prior to the commencement of new or irregular activities in proximity to an active eagle nest (within 500 m), and having them observe proper protocol in order to avoid disturbance during these activities;</li> <li>• Restriction of tree and woodland clearing to periods outside of the breeding bird season which extends between May 1 and August 15;</li> <li>• Protection of suitable breeding habitat as a result of the provision of compensatory habitat for species protected under the Endangered Species Act;</li> <li>• Restoration of disturbed habitats at closure to habitats capable of supporting a diversity of wildlife species;</li> <li>• Implementation of sound abatement strategies;</li> <li>• Enforcement of speed limits along proposed mine access roads to reduce the potential adverse effects of increased vehicular traffic associated with the RRP. 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;</li> </ul>	<p>Since the start of construction in 2015 New Gold has been implementing a no tree cutting policy during the breeding bird window.</p> <p>The project has also installed speed limit signs on project roads and has implemented a radar system for speeding.</p> <p>In the summer of 2016 wildlife crossing signs were installed at six locations on the project site to help reduce the potential for vehicle collisions with wildlife. Monitoring logs of reported wildlife collisions have been kept although there is room to improve on the reporting strategy as not all small animals (ie; skunks) are reported.</p> <p>By the end of 2016 there were two reported Bald Eagle's nests within the project boundary but not within the infrastructure footprint.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
101 cont	<ul style="list-style-type: none"> <li>• Restrictions to clearing or modification of known Trumpeter Swan breeding habitat to outside the breeding season (March 15 to August 15) to prevent the disturbance of nesting swans or impact the likelihood of cygnet survival;</li> <li>• Disposing of food wastes generated on site in an appropriate manner that limits the attraction of wildlife, including Common Ravens, Turkey Vultures and Bald Eagles;</li> <li>• Timely removal of carcasses of road-killed animals or any other carcasses found onsite to limit the attraction of wildlife, such as Common Ravens and Turkey Vultures; and</li> <li>• Treatment of tailings slurry containing cyanide and associated heavy metals from the ore leaching process in the process plant using the SO<sub>2</sub>/Air process before being discharged to the TMA; and</li> <li>• Creation of generally abiotic conditions within the fenced TMA during operations to limit the interest of the pond to waterfowl.</li> </ul>	<p>The mitigation strategies listed above were implemented during 2016, with the exception of aspects related to the TMA and tailing slurries. The TMA and tailings slurry mitigation strategies were not applicable as the project was in the Construction Phase in 2016 and the TMA and Mill were not constructed.</p>	<p>Ongoing</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
<p><b>102</b></p>	<p>In regards to the transmission line:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• Tree clearing to take place outside of the breeding bird nesting season, defined as the period from May 1 to July 31;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> </ul>	<p>Construction of the transmission line was initiated in late 2015 and completed in April 2016 to ensure no impact to birds and limited impact to understory vegetation:</p> <p>Prior to and during the construction period no sticks nests were identified.</p> <p>A vegetation and breeding bird survey was conducted by qualified biologists during 2014 and no rare plants were identified in the construction area.</p> <p>The separation of conductor wires was reviewed during the design of the hydro line to ensure spacing distance was adequate.</p>	<p>Completed April 2016</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
102 cont	<ul style="list-style-type: none"> <li>• Construction crews will be advised not to interfere with or harass wildlife. No hunting or fishing by construction crews will be allowed. Disciplinary actions will be taken should either occur; and</li> <li>• Contractors will be required to handle food and food wastes in a responsible manner, and to educate workers to ensure no feeding of wildlife.</li> </ul>	<p>During the 2016 construction phase of the transmission line regular meetings were held with the contractor as well as regular site inspections to ensure that all commitments were being met. There were no cases of hunting, fishing or feeding wildlife observed.</p> <p>The survey team that was working on the project did frequently report wildlife sightings of timber wolves to New Gold RRP.</p>	Completed April 2016
103	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 RRP site to productive, naturalized vegetation communities on cessation of mining capable of supporting a diversity of wildlife species. RRP revegetation efforts at closure will include providing suitable habitat for SAR species, most notably whip-poor-will, and other species of interest, if practical.	This commitment is applicable during the mine closure planning phase and will be implemented post mine closure.	N/A

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
104	<p>The RRP footprint has been altered through consultation with the MNRF in order to further avoid known whip-poor-will territories where feasible, including maintenance of forest buffers between RRP components and whip-poor-will nesting and foraging habitat where practical. Provide compensatory whip-poor-will habitat that protects known territories and other identified suitable habitat. Where feasible, manage site lighting fixtures to reduce excess light production near whip-poor-will foraging areas, so as to minimize disturbing these nocturnal birds (with all appropriate health and safety issues considered).</p>	<p>Private land habitat and compensation land has been provided in accordance with the Provincial ESA permit ESA FF-C-001-14 since the start of construction.</p> <p>Site environmental inspections address location and use of light plants as possible while maintaining site safety aspects.</p>	Ongoing
105	<p>NG will implement a monitoring plan for Eastern Whip-poor-will populations and nesting in proximity to the proposed mine and transmission line sites, within compensatory habitat areas. Continue funding external research programs in collaboration with the MNRF in order to further our understanding of this poorly studied species, as part of a larger overall benefits compensation package required by the Endangered Species Act permit.</p>	<p>A monitoring plan was developed in 2015 and implemented as needed during 2015 and 2016 in accordance with ESA FF-C-001-14.</p> <p>New Gold RRP will fund a separate / independent research program as a requirement and in accordance with the ESA permit although there was not a program in place during 2016.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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 RRP development.	Private land habitat and compensation land has been provided in accordance with the Provincial ESA permit ESA FF-C-001-14 since the start of construction.	Ongoing
107	NG will identify Barn Swallow nesting colonies prior to mine construction. Establish zones where Barn Swallow colonization is desired, tolerated or not wanted. Create artificial nesting structures to encourage recolonization or new colonization by Barn Swallows in areas where farm structures are removed. Implement a monitoring plan for Barn Swallow populations in proximity to the proposed mine and transmission line sites and in appropriate control areas.	<p>Four artificial nesting structures were put in place in April 2015, prior to the 2015 breeding season. During 2016, the artificial structures were monitored. In 2016, one of the nesting structures was utilized.</p> <p>There were some cases of barn swallows and nests being identified within construction areas. These cases were treated by isolating work areas and stopping work until the eggs had hatched and the birds had abandoned the nest.</p>	Ongoing
108	Where feasible, RRP 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).	Site environmental inspections address location and use of light plants when possible while maintaining site safety aspects.	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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.	<p>Annual SAR monitoring has been implemented on site since the EA baseline research studies.</p> <p>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.</p> <p>The MNRF and EC have received two annual monitoring reports. As the project advances opportunities for habitat development post closure will be examined.</p>	Completed 2016 and Annual SAR monitoring report submitted to MNRF and EC January 13, 2017

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
110	<p>Mitigation measures that will be used to reduce potential adverse effects to Eastern Whip-poor-will will include the following:</p> <ul style="list-style-type: none"> <li>• Provision of compensatory whip-poor-will habitat that protects known territories and other identified suitable habitat;</li> <li>• Restricting the clearing of habitats to periods outside the breeding bird season which occurs from May 1 to August 15;</li> <li>• Implementation of sound abatement strategies to dampen sound infiltrating habitats surrounding high traffic areas of the mine;</li> <li>• Where feasible, management of site lighting fixtures to reduce excess light production near whip-poor-will foraging areas so as to minimize disturbing these nocturnal birds (with all appropriate health and safety issues considered);</li> <li>• Maintenance of forest buffers between RRP components and whip-poor-will nesting and foraging habitat where practical;</li> <li>• Management of dust through dust suppression activities (best management practices);</li> <li>• Enforcement of speed limits along mine-controlled roads to reduce the potential adverse effects of increased vehicular traffic associated with the RRP. 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;</li> </ul>	<p>These measures were implemented during 2015 and continued during 2016.</p>	<p>Ongoing</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
<p><b>110 cont</b></p>	<ul style="list-style-type: none"> <li>• Environmental induction of RRP personnel, including SAR identification and sensitivities, and knowledge of Endangered Species Act permit conditions;</li> <li>• 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</li> <li>• Continue funding external research programs in collaboration with the MNRF 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.</li> </ul>	<p>These measures were implemented during 2016.</p> <p>New Gold RRP will fund a separate / independent research program as a requirement and in accordance with the ESA permit.</p>	<p>Ongoing</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
111	<p>The primary mitigation strategies for limiting adverse effects to Bobolink will include:</p> <p>Restricting the development of open country habitats to periods outside the breeding bird season which occurs from May 1 to July 31;</p> <ul style="list-style-type: none"> <li>• 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 RRP development;</li> <li>• Enforcement of speed limits along mine controlled roads to reduce the potential adverse effects of increased vehicular traffic associated with the RRP. 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;</li> <li>• Environmental induction of RRP personnel, including SAR identification and sensitivities and knowledge of Endangered Species Act permit conditions;</li> <li>• Implementation of sound abatement strategies to dampen sound infiltrating habitats surrounding high traffic areas of the mine;</li> <li>• Restoration of disturbed habitats at mine closure or encouraging development of habitats capable of supporting Bobolink and other open country species; and</li> <li>• 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.</li> </ul>	<p>Since the start of construction New Gold RRP has implemented the mitigation strategies listed in this condition on site.</p>	<p>Ongoing</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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"> <li>• Identification of Barn Swallow nesting colonies prior to mine construction;</li> <li>• Restricting habitat displacement for mine infrastructure to periods outside the breeding bird season which occurs from May 1 to August 15;</li> <li>• Creation of artificial nesting structures to encourage recolonization or new colonization by Barn Swallows in areas where farm structures are removed;</li> <li>• Restoration of disturbed habitats at closure or encouraging development of habitats capable of providing suitable Barn Swallow foraging habitat;</li> <li>• Sound abatement strategies will be implemented to dampen sound infiltrating habitats surrounding high traffic areas of the mine;</li> <li>• 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;</li> </ul>	<p>The RRP began to 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 two years. 2016 was the first year that nesting has occurred in one of the structures.</p> <p>As the project advances toward operations the need to establish zones where barn swallow colonization is desired, tolerated or not wanted will be taken into consideration as well as the need to provide additional nesting structures.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
112 cont	<ul style="list-style-type: none"> <li>Enforcement of speed limits along mine controlled roads to reduce potential adverse effects of increased vehicular traffic associated with the RRP. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity.</li> </ul> <p>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</p> <ul style="list-style-type: none"> <li>Implementation of a monitoring plan for Barn Swallow populations in proximity to the proposed mine and transmission line sites and in appropriate control areas.</li> </ul>	<p>In 2015 New Gold RRP installed speed limit signs on project roads and implemented a policy for speeding on site.</p> <p>In 2016 as vehicle traffic increased, radar detection was implemented on site to reduce; i) safety incidents, ii) reduce collisions with wildlife, iii) reduce dust. A collision log was kept of all collisions as well.</p> <p>Wildlife crossing signs were also installed in the summer of 2016 on project roads.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
113	<p>Mitigation measures that will be used to reduce potential adverse effects to all species of Special Concern and Provincially rare species will include the following:</p> <ul style="list-style-type: none"> <li>• Restriction of principal habitat displacement for mine infrastructure to periods outside the breeding bird season which MNRF has indicated occurs from May 1 to August 15;</li> <li>• Implementation of sound abatement strategies to dampen sound infiltrating habitats surrounding high traffic areas of the mine;</li> <li>• Where feasible, RRP lighting fixtures will be directed in such a fashion as to reduce excess production of light to the surrounding environment.</li> <li>• 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.</li> <li>• Enforcement of speed limits along mine controlled roads to reduce the potential for adverse effects of increased vehicular traffic associated with the RRP. Signs warning drivers of the possibility of wildlife.</li> </ul>	<p>Since the start of construction New Gold RRP has been implementing a no tree clearing policy during the breeding bird season.</p> <p>The project has also implemented sound abatement strategies through planning tree clearing to consist only in areas of mine infrastructure, purchasing new equipment constructed with muffler systems and implementing preventative maintenance programs to ensure all equipment is operating adequately.</p> <p>In 2015 speed limit signs were posted on project roads and moving into 2016 a program was implemented 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. Currently there are no mitigation measures necessary however once the Construction Phase of the project is complete, there will be an opportunity to identify areas where nesting will be encouraged.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
<p><b>113 cont</b></p>	<ul style="list-style-type: none"> <li>• Inclusion of wildlife awareness information into regular safety inductions performed by the mine. Workers will be made aware of seasonal changes in wildlife behaviour or presence in proximity to the mine;</li> <li>• Treatment of tailings slurry containing cyanide and associated heavy metals in the process plant using the SO<sub>2</sub>/Air process before being discharged to the TMA; and</li> <li>• 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.</li> </ul>	<p>These measures were implemented during 2015 as applicable. Restoration-related aspects were not applicable to 2016. No tailings were produced during 2016.</p> <p>In 2016, wildlife awareness was a seasonal activity as bear awareness and bird nesting behaviour were discussed often to lower the risk of an encounter.</p>	<p>Ongoing</p>
<p><b>114</b></p>	<p>Timing of the transmission line construction will be planned to avoid the breeding bird and main tourist season, as possible.</p>	<p>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.</p>	<p>Complete April 2016</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
115	<p>Traditional Knowledge/Traditional Land Use (TK/TLU) data has been widely collected for the RRP, including from the closest communities of BGRFN, Rainy River First Nations and Naicatchewenin First Nation. All TK/TLU sessions were community driven, meaning that the method of data collection was community specific. The majority of the data has been broad and overreaching, which NG will continue to respect as it serves as the basis for Aboriginal Persons unique relationship to the land. TK/TLU collection will continue; information collected will be appropriately considered for construction, operation and closure phases. For example, NG will further investigate the historical travel corridor and incorporate appropriately any new information that may become available. (Letter to Chiefs from Kyle Stanfield, October 2013).</p>	No additional TK/TLU was provided in 2016.	Ongoing
116	<p>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).</p>	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 EA consultations

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
117	<p>NG has an open invitation for First Nations, the MNO and regional stakeholders to participate in all baseline and environmental monitoring programs, including Whip-poor-will, where appropriate and to share monitoring results. NG will continue to advise of the opportunity at public forums in order to encourage anyone who's interested to participate. (Letter to Chiefs from Kyle Stanfield, October 2013).</p>	<p>In 2016, New Gold RRP provided Environmental presentations to Mitaanjigamiing First Nation, Seine River First Nation, Lac La Croix First Nation, Couchiching First Nation, Rainy River First Nations, Naicatchewenin First Nation, and Big Grassy River First Nation.</p> <p>Meetings with additional communities are scheduled for 2017.</p> <p>Big Grassy River First Nation also had an Environmental Monitor that was actively engaged in environmental monitoring at the Rainy River site.</p>	Ongoing
118	<p>Additional information related to Lake Sturgeon and the Rainy River First Nations management program as requested, was added to the Final EA Report.</p> <p>NG has committed to a program of close coordination with Rainy River First Nations in support of the pre-existing First Nation Watershed Program and water quality protection. Company funding will be provided as part of the fisheries compensation program to further water quality enhancement programs for the Pinewood and similar agriculturally-impacted waterways.</p>	<p>New Gold has a Participation Agreement with the Rainy River First Nations. This program will be instituted in the future through the Environmental Monitoring Board.</p> <p>During discussions around the Fish Tissue Monitoring Program in the Pinewood River fish, Rainy River First Nation identified that sturgeon could be added to the program.</p> <p>RRP will continue to look for additional ways to support this initiative going forward.</p>	N/A

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
119	NG will reach out to the Seven Generations Education Institute and/or the MNRF to obtain any additional information on baseline health of animals and fish. (Letter to Chiefs from Kyle Stanfield, October 2013).	Complete	March 3, 2014
120	Aboriginal People will play an active role in the development of the mine Closure Plan, including development of the monitoring and mitigation programs. While the Closure Plan will be completed prior to construction, NG will consult on significant revisions periodically during operations to ensure incorporation of TK and best management practices. (Letter to Chiefs from Kyle Stanfield, October 2013).	The Aboriginal communities participated in a joint technical review of the Closure Plan and have planned participation in the 2017 Closure Plan Amendment.  No activity on the Closure Plan occurred in 2016.	August 2014
121	Monitoring programs targeted at ungulates (moose, deer) will be coordinated with local Aboriginal people. (Letter to Chiefs from Kyle Stanfield, October 2013).	The Deer Tissue Monitoring Program was initiated in the Fall of 2016. There were presentations to First Nation Communities before the program started and results will be communicated in 2017.	Ongoing
122	NG would be pleased to assemble a map showing the locations of the closest First Nation community water supply intakes on receipt of the locations/coordinates. (Letter to Chiefs from Kyle Stanfield, October 2013).	Water supply intake locations known were included on map provided by New Gold Rainy River Project.	October 1, 2014

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
123	<p>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 analyze 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.</p>	<p>No new information was obtained or new impacts predicted during 2016 related to the RRP, that could affect the health of Aboriginal people.</p> <p>Results from the 2016 Fish Tissue program indicate no effect caused by the RRP activities. Results from the 2016 Deer Tissue Monitoring program will not be available until 2017.</p>	Ongoing
124	<p>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). NG has an employee assistance program available to all employees. RRP employees and contractors are required to commit to be fit for duty (physical, mental and emotional state suitable to work safely). NG continues to commit to work with Aboriginal individuals to ensure there are appropriate cultural considerations, including an Aboriginal liaison on site, locations to conduct ceremony etc.</p>	<p>A First Nations Aboriginal liaison is onsite and available to meet with employees.</p> <p>RRP also has seasonal public ceremonies, established tobacco offering stations and provides an employee assistance program as part of the benefits provided to all employees.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
125	As a best practice and acting as a responsible neighbour, NG will notify local stakeholders of project activities as appropriate.	<p>New Gold RRP established a neighbour committee in 2015, which continued in 2016, to provide information to surrounding residents regarding construction work at the site.</p> <p>Quarterly newsletters and other notices with respect to construction activities were mailed to residents district wide.</p> <p>New Gold RRP also provided site tours to the neighbours in 2016. The Neighbour's Tour was held on September 13th 2016.</p>	Ongoing
126	NG has and will continue to actively engage the MNRF and local outfitters including those that hold the Bear Management Areas that will be affected by the RRP.	As 2016 was a construction year, the focus was to keep stakeholders safe and advising of active construction zones and avoidance where necessary.	Ongoing
127	NG will calculate the area of forest land that will be removed from the total forest land within BGRFN territory, utilizing public sources and provide this information to the First Nation on delineation of the traditional territory by the BGRFN.	<p>New Gold RRP had extensive discussions with Big Grassy River First Nation (BGRFN) regarding traditional territory and signed a Participation Agreement in January 2015.</p> <p>New Gold RRP also provided the clearing plan to BGRFN on February 13, 2015.</p>	Complete February 2015

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
128	<p>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.</p>	<p>Nine First Nations and the MNO had confirmed participation in the Draft Closure Plan technical review. The results of the independent technical reviews were submitted to New Gold RRP in September 2014, with detailed responses provided and revisions made to the Closure Plan as appropriate.</p> <p>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.</p>	<p>The independent review completed September 2014.</p> <p>The Closure Plan was accepted as filed on February 23, 2015.</p>
129	<p>NG is open to discussing closure objectives in relation to the results of the Traditional Knowledge / Traditional Land Use (TK / TLU) study.</p>	<p>New Gold RRP remains open to this discussion ongoing. No specific comments received in 2016.</p>	<p>Ongoing</p>
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"> <li>• Continuing to involve BGRFN members in the development of adaptive management techniques related to closure planning, including the rehabilitation of habitat for wildlife; and</li> <li>• Restoring access to RRP lands following mine closure to the extent that such access is safe / possible.</li> </ul>	<p>New Gold RRP remains committed to providing access. Consideration will be provided upon completion of construction activities.</p>	<p>Ongoing</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
131	<p>NG has committed to provide members of the BGRFN, Big Island First Nation, Ojibways of Onigaming First Nation, Naotkamegwanning First Nation, Rainy River First Nations, Naicatchewenin First Nation and Métis represented by the MNO Region 1 Consultation Committee, the ability to access certain lands that NG is able to make available for gathering of wild medicines, berries or other vegetation. Access will be coordinated with the Aboriginal communities.</p>	<p>New Gold RRP remains committed to providing access to all areas of the site that are safe to do so. During construction, access is more limited as there is heavy equipment and construction activities in numerous areas.</p> <p>In 2016, Aboriginal 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.</p>	Ongoing
132	<p>NG has committed to ensure that Aboriginal communities (including BGRFN, Big Island First Nation, Ojibways of Onigaming First Nation, Naotkamegwanning First Nation, Rainy River First Nations, Naicatchewenin First Nation and Métis represented by the MNO Region 1 Consultation Committee) have the ability to access the site for cultural and ceremonial purposes so that local Aboriginal people can undertake ceremonies at different times of the year to show respect for the land and its spiritual aspects. This will ensure that young people can participate in ceremonies and learn from elders and ceremonialists. Teaching through the generations will therefore be maintained.</p>	<p>New Gold RRP remains committed to the opportunity for ceremony. In 2016, New Gold RRP hosted two annual ceremonies, one in Spring and one in Fall.</p> <p>In 2016, there was also a Water Ceremony and a Blessing of the Administrative Building.</p> <p>During 2016 the following was held onsite:            Fall Ceremony - Oct 19, 2016            Spring Ceremony - May 31, 2016            Blessing Ceremony - June 22, 2016</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
133	A detailed Fire Response Plan will be developed (Final EA Report, Section 8.2). This document will be made available for MNRF review prior to construction initiation.	A detailed Fire Response Plan was developed in 2015. In 2016, the Fire Response Plan was reviewed.	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.	<p>New Gold RRP established a neighbour committee in 2015 to provide information to surrounding residents regarding construction work at the site.</p> <p>As well, quarterly newsletters and other notices with respect to construction activities were mailed to residents district wide.</p> <p>During 2016 the following was held:            Fort Frances Chamber of Commerce - Feb 11, 2016            Men's Breakfast Club - Aug 9, 2016            Confederation College - June 13, 2016            Community Presentation at the Emo Legion - Sept 15, 2016</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
135	<p>Related to the transmission line:</p> <ul style="list-style-type: none"> <li>• Compensation will be provided for merchantable timber value where applicable;</li> <li>• Maintain transmission line set back distances of not less than 100 m from area lakes to provide effective visual screening from open waters;</li> <li>• 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</li> <li>• 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.</li> </ul>	<p>New Gold RRP proactively placed newspaper advertisements to advise recreational users of construction activities along the transmission line during the hunting season in 2015, as well as engaged with the Clearwater Association.</p>	<p>Completed 2015</p>
136	<p>NG will implement a hiring policy that encourages employment of local workers, including members of human environment regional study area First Nations and Métis communities. Where feasible, goods and services will be procured from local and regional suppliers as well as suppliers that can further demonstrate Aboriginal employee content. Provide on the job Common Core training to assist local workers to develop mining-specific skills, and implement career training and development opportunities for employees once hired. NG will provide continuous, on the job safety training.</p>	<p>In 2015, NG implemented a Human Resource Strategy that focused on local employment which continued in 2016. Also in 2015, 16 career fairs were held in the region.</p> <p>In 2016, New Gold RRP had a business development officer available on staff to support local businesses in providing goods and services to the project.</p>	<p>Ongoing</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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 RRP workforce.	<p>New Gold RRP continued in 2016 to mail newsletters and engage with local stakeholders including Chambers of Commerce.</p> <p>During 2016 the following was held:            Fort Frances Chamber of Commerce - Feb 11, 2016            Men's Breakfast Club - Aug 9, 2016            Confederation College - June 13, 2016            Community Presentation at the Emo Legion - Sept 15, 2016</p>	Ongoing
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.	New Gold RRP has presented an access agreement to two local baitfish harvesters for their consideration during 2016.	Ongoing
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.	New Gold RRP and BGRFN signed a participation agreement on January 9, 2015 and the ongoing relationship is good.	Completed January 2015
140	Where NG has control, commercially reasonable efforts will be made to work with local logging companies, Resolute, MNRF and local loggers to facilitate the	A local logging company was utilized to remove merchantable timber during 2015 and 2016, as needed to support project development.	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
	use of merchantable timber by local mills, in recognition of the importance of mills to the local economy.		
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.	There were no requests for access during 2016.	N/A
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 2016 (Construction Phase)	N/A
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 RRP strives to meet or exceed the health and safety regulatory requirements. New Gold RRP provides and ensures that all workers have the necessary personal protection equipment to protect against industrial hygiene exposures.	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
144	<p>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 analyze 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.</p>	<p>No new information was obtained or new impacts predicted during 2016 related to the RRP, that could affect the health of Aboriginal people.</p> <p>Results from the 2016 Fish Tissue program indicate no effect caused by the RRP activities. Results from the 2016 Deer Tissue Monitoring program will not be available until 2017.</p>	Ongoing
145	<p>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).</p>	<p>New Gold RRP has an employee assistance program available to all employees. RRP employees and contractors are required to commit to be fit for duty (physical, mental and emotional state suitable to work safely).</p> <p>New Gold RRP continues to commit to work with Aboriginal individuals to ensure there are appropriate cultural considerations, including an Aboriginal liaison on site, and locations to conduct ceremony.</p>	Ongoing
146	<p>A blasting plan will be developed describing all proposed blasting operations at the RRP site. All personnel who handle explosives will have appropriate training; all other individuals will be restricted from access.</p>	<p>New Gold RRP developed blasting plans during 2015 and 2016 that followed this commitment. All personnel who handle explosives have had the appropriate training. A locked fence with signage provides restricted access to the Explosives mixing and storage areas.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
147	Recognizing that safety of workers is paramount, NG will attempt to reduce light pollution as possible.	<p>This approach was taken during 2016 while maintaining employee safety during night shift operation.</p> <p>Site inspections of laydowns and work areas included inspections of light plants to minimize light pollution and impact on wildlife active during the night.</p>	Ongoing
148	The RRP has been designed to meet all applicable fire protection system requirements and codes. Regular fire drills will occur to ensure that all workers are familiar with fire response procedures, as dictated within the environmental management system. All workers and visitors on site will receive an orientation which includes fire reporting and response procedures.	<p>All personnel on site receive a site orientation.</p> <p>The site has acquired a fire truck and established an Emergency Response Team in place to respond to fires.</p> <p>During 2016, two fire drills were held.</p>	Ongoing
149	Should it be determined in the future that additional fire break is required, appropriate approvals will be obtained from the MNRF.	No additional fire break was determined to be required during 2016.	N/A

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
150	NG will ensure that safe access to properties is maintained during the construction and operation phases of the project. Once detailed plans are progressed, NG would welcome the opportunity to discuss further.	<p>For the residents of Tait Rd, New Gold RRP worked cooperatively with landowners during 2016 to ensure safe access to their properties during the construction of Highway 600. Public access has also been maintained on Marr Road.</p> <p>Signage and gates are in place to ensure safe access to site. Security personnel also monitor site access.</p>	Ongoing
151	Any infrastructure, such as hydro services, that require relocation will be completed as expediently as possible, to minimize disruption to local users. It is currently envisioned that the disruption will only occur during the switchover from the existing to the (at that time) newly built line.	During 2016, there was no relocation of services that caused a disruption to local users.	Ongoing
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 the re-aligned Highway 600 was completed in 2016.	Complete
153	NG has had extensive consultations with the MTO in Thunder Bay related to the RRP highway planning and will continue to discuss issues related to the Highway 600 re-alignment, and associated maintenance and safety	<p>In 2016, New Gold RRP had extensive discussions with the MTO, Township of Morley, Township of Chapple and Hydro One regarding Highway 600.</p> <p>The re-aligned Highway 600 was opened to the public on December 23, 2015.</p>	<p>An agreement was signed with the Township of Chapple on March 24, 2016</p> <p>An agreement was signed with the Township of Morley on Feb 17, 2016.</p>

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
	issues with MTO, the Township of Chapple, Stratton, the Rainy River Valley Safety Coalition, school bus operators, utility companies and emergency response groups.		
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 in 2016.	Completed
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.	All load transport requirements and restrictions were met during 2016.	Ongoing
156	Only licensed suppliers and carriers will be selected for the supply and transport of hazardous materials to the RRP site. When suppliers are selected, Rainy River will share supplier handling and transport information with the MNO.	<p>Only licensed suppliers and carriers were selected for the supply and transport of hazardous materials to the RRP site.</p> <p>Information was shared with the MNO by the RRP in compliance with this condition during 2016.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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 were 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.	<p>All vehicles travelling onsite are required to have spill kit, first aid kit, fire extinguisher and radio.</p> <p>New Gold RRP has also provided an onsite emergency response trailer containing equipment and supplies for handling hazardous spills to the environment.</p> <p>During 2015, an Emergency Response team was established and continued training in 2016 which included the operation of an onsite fire truck.</p>	Ongoing
159	Notification and/or reporting of any vehicular accidents and spills will follow Provincial (Ministry of the Environment) and other applicable requirements.	<p>During 2016, there were no incidents of vehicular accidents causing spills. In one instance only, while a tow truck was preparing to remove a vehicle that had driven into a ditch along the East Access Road, the tow truck had a hydraulic line break.</p> <p>Each incident where a vehicle left the road was monitored during the vehicle removal for any spills; no spills occurred in this way during 2016.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
160	<p>With regards to controlling adverse traffic effects during transmission line construction:</p> <ul style="list-style-type: none"> <li>• Ensuring that NG employees and contractors / subcontractors adhere to posted speed limits and practical speed limits along the ROW;</li> <li>• Contractors and their subcontractors will be required to have properly and seasonally maintained equipment; and</li> <li>• Maintain regular communications with the Township of Chapple, the MTO and Ontario Provincial Police representatives, to monitor and mitigate traffic effects.</li> </ul>	<p>New Gold RRP regularly reminds all site personnel of the speed limit requirements and Site Security conducts speed monitoring onsite.</p> <p>Regular communications between Chapple, MTO and OPP are maintained. Specifically OPP have been requested to provide additional traffic monitoring on site access roads to reduce the likelihood of speeding and poor driving behaviours.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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 RRP 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 2016 New Gold RRP has:</p> <ol style="list-style-type: none"> <li>1) Contracted a local Aboriginal business to provide a 500+ person accommodation facility for construction workers who are contracted by New Gold RRP.</li> </ol> <p>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, approximately 5 km south of the project site.</p> <p>The accommodation facility was built by Onikaajigan Construction, a partnership between Rainy River First Nation, Naicatchewenin First Nation and Saulteaux Consulting and Engineering. It is owned and operated by Onikaajigan Construction. New Gold RRP exclusively leases the camp facility for the purpose of housing out of town construction workers.</p> <ol style="list-style-type: none"> <li>2) Committed to hiring local people.</li> <li>3) Developed an employee incentive program to support new housing development.</li> <li>4) Working with local developers to construct new accommodation in the region.</li> </ol>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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.	During 2016, buses were used to transport employees to site from Fort Frances, Emo, Chapple Fire Hall and the accommodate facility.	Ongoing
163	NG will continue to discuss the RRP and potential additional demands that could be placed on the services of regional Municipalities. NG will continue to support government-led initiatives that support social sustainability during all project phases. NG will work with local service agencies to gather information about social issues or service capacity issues so that they may be addressed in a collaborative manner. NG will maintain communications with local and regional service providers to monitor and work collaboratively to address any Project-related changes that may be experienced.	<p>New Gold RRP provides public presentations, works with the Chambers of Commerce, holds regular meetings with Chapple and provides updates at the Rainy River District Municipal Association.</p> <p>During 2016 the following was held:            Fort Frances Chamber of Commerce - Feb 11, 2016            Men's Breakfast Club - Aug 9, 2016            Confederation College - June 13, 2016            Community Presentation at the Emo Legion - Sept 15, 2016</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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.	<p>In 2016, RRP requested voluntary submission of organ and tissue by local hunters as part of the Deer Tissue Monitoring program.</p> <p>Results from the 2016 program will not be available until 2017 and will be made available to local residents and Aboriginal communities.</p>	Ongoing
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 was completed by Dan Morisseau on October 23rd 2015. New Gold RRP is working with Chapple Heritage Committee on the editing and distribution. Once the document is complete, it will be distributed to MOECC and MTCS.	Ongoing
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.	<p>Emergency response training occurred during 2016 to the Emergency Response Team.</p> <p>One field emergency response drill was conducted as a review of the emergency response procedures in 2016. The field drill included a review and follow-up actions as part of the conclusion to ensure better preparedness.</p> <p>One small fire occurred in 2016 however it was immediately contained and resulted in no emergency action and reported appropriately.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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"> <li>• 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.</li> <li>• 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.</li> </ul> <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>New Gold RRP is committed to providing access to the site for cultural and ceremony purposes.</p> <p>All New Gold RRP staff and contractors undergo Cultural Awareness training as part of the site induction.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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, RRP requested voluntary submission of organ and tissue by local hunters as part of the Deer Tissue Monitoring program.</p> <p>Results from the 2016 Fish Tissue program indicate no effect on fish tissue caused by the RRP activities. Results from the 2016 Deer Tissue Monitoring program will not be available until 2017.</p>	Ongoing
169	<p>NG will conduct a risk assessment of the potential long-term exposure of fish and wildlife to accumulated metals within the constructed wetland. Such a study will be carried out within one to two years prior to mine closure (or earlier during the project operations phase), and if a meaningful risk is determined to exist the risk will be mitigated as part of overall mine closure by removing and disposing the contaminated sediments to the bottom of the pit lake. This could readily be accomplished by a small dredging operation.</p>	<p>Not applicable during the Construction Phase of 2016 as construction of the constructed wetland had not begun.</p>	N/A

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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.	This memo was completed September 11, 2013.	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 2016 (closure activity).	N/A
172	A range of conservation approaches will be considered in the recommended Cultural Heritage Assessment Report / Cultural Heritage Documentation Reports for Sites #11 and #13 as suggested by MTCS.	<p>Site #11 was demolished in 2015 as it was deemed to be hazardous and structurally unfit. Unique features, such as blacksmith hardware were removed and are currently in storage.</p> <p>As part of the development of the Richardson Trail, New Gold RRP intends to highlight the settlement history through artifacts such as the hardware. Prior to the demolition, New Gold RRP contacted a representative of the Chapple Heritage Committee to ensure there were no other considerations.</p> <p>Site #13 remains in situ. A descendent of the builder has expressed an interest in relocating the structure; New Gold RRP is open to considering the move of the structure.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
173	<p>NG will provide follow-up documentation related to Cultural Heritage Assessment Report / Cultural Heritage Documentation Reports to the following local museums and archives:</p> <ul style="list-style-type: none"> <li>• Chapple Museum;</li> <li>• Kay-Nah-Chi-Wah-Nung Historical Centre (Manitou Mounds);</li> <li>• Rainy River District Women's Institute Museum; and</li> <li>• Fort Frances Museum and Cultural Centre.</li> </ul>	<p>Completed on April 14, 2015.</p> <p>A number of former local residents have come forward to request copies of the reports which New Gold RRP provided.</p>	April 14, 2015
174	<p>Monitoring would occur for the following durations:</p> <ul style="list-style-type: none"> <li>• Archaeology: construction phase</li> <li>• Built heritage: construction phase</li> </ul>	<p>New Gold RRP has completed a thorough investigation for cultural resources within the project area (Woodland Heritage Resources and Unterman McPhail). Stage 4 Acceptance letters received Sept 28, 2016. All field work was completed in 2015.</p> <p>In addition, all New Gold employees and contractors are advised during induction of the potential of cultural resources and advised to stop work should potential resources be identified.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
175	<p>With regards to protection of cultural heritage values during transmission line construction:</p> <ul style="list-style-type: none"> <li>• 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 Cemeteries, Ministry of Government Services.</li> <li>• 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</li> <li>• 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, Naothamegwanning 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.</li> </ul>	<p>No human remains or cultural resources were identified during transmission line clearing or any other works in 2016.</p> <p>The Transmission Line construction was completed April 2016.</p>	Complete

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
176	<p>Related to transmission line, construction will be supervised by a qualified archaeologist at identified areas of high archaeological potential. Regular, ongoing discussions with stakeholders, Aboriginal people and local communities will help to monitor any effects to the socio-cultural environment and identify mutually satisfactory ways to mitigate negative or enhance positive effects. A formal complaints procedure will be established to provide stakeholders and Aboriginal peoples a voice during the construction, operation and decommissioning phase of the transmission line project. A response protocol will also be established to ensure that follow up occurs.</p>	<p>Prior to construction activities, New Gold RRP conducted the required assessments on the transmission line, which included the field assessment of high potential areas as per the 2011 Standards and Guidelines for consultant archaeologists.</p> <p>Archaeology clearance letter was received on the transmission line on Dec 29, 2014. The Transmission Line construction was completed April 2016.</p> <p>New Gold RRP also employs a qualified archaeologist and in 2015 had consultant archaeologist on site. No cultural resources were identified during 2016.</p> <p>NG completed and submitted an external feedback procedure to MOECC on February 2, 2015.</p>	Complete
177	<p>A targeted site investigation will be conducted at the end of mine life to identify soils that may have been affected by hydrocarbons or chemicals in specific areas (e.g. truck refuelling area). Soil materials found to exceed the appropriate clean up criteria for hydrocarbons will be remediated according to government requirements. If there is reason to suspect an area of soil has been affected by chemicals other than hydrocarbons, soil samples will be collected and tested. If the applicable regulatory requirements are exceeded, an appropriate method of disposal will be sought in consultation with the relevant authorities.</p>	Not applicable during 2016 Construction Phase (Closure Activity).	N/A

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
178	Document and respond to comments, issues or concerns.	An External Feedback and Compliant Protocol was issued in follow up to the Provincial EA approval and was implemented during 2015 and 2016.	Completed February 2, 2015
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 the registry provided 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 RRP development.	BGRFN and New Gold RRP signed a Participation Agreement on January 9, 2015.  In the agreement there is a defined protocol for communication and engagement.	9-Jan-15
181	Environmental monitoring will be conducted in accordance with standard practice and regulatory requirements, including any site-specific environmental approvals.	Completed during 2016 as applicable.	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
182	Operational procedures to minimize the potential of accidents or malfunctions will be incorporated into the environmental management system. Penalties will be imposed for operational violations.	During 2016, the EMS continued to be developed and ongoing. The EMS system continues to be developed using the ISO 14001 Standards and will include operational procedures with penalties for non-conformances.	Ongoing
183	Procedures will be regularly reviewed as part of the environmental management system.	<p>The EMS was not fully in place and development was still on going in 2016. As such no monitoring of the EMS was completed in 2016.</p> <p>Both New Gold Corporate and the RRP have some policies and procedures in place and in draft form.</p> <p>Reviews of the implemented New Gold RRP EMS, procedures and policies will be completed once the EMS is finalized.</p>	Ongoing
184	The emergency response plan included in the environmental management system will address the primary hazardous materials on site including procedures for spill response on the trucking route to the RRP site.	During 2016, the EMS continued to be developed and ongoing. The emergency response plan included in the RRP EMS addresses the primary hazardous materials onsite and spill response.	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
<b>185</b>	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 RRP 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 each chemical. This aspect is included as part of the RRP Health and Safety WHMIS Program.	Ongoing
<b>186</b>	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.	Completed during 2016. The majority of the approvals required for construction and operation were received during 2015 however some were required and received during 2016.	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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"> <li>• Verify the accuracy of the environmental assessment of a designated project; and</li> <li>• Determine the effectiveness of any mitigation measures.</li> </ul>	<p>During the course of construction of the water and tailings management facilities, deformations were identified at one of the dams associated with such facilities. As a result, work on those facilities was paused in February 2016. Additional geotechnical testing and follow up monitoring were conducted.</p> <p>After receiving feedback from New Gold's Independent Tailings Review Board (a panel of independent experts was established by New Gold in line with best practices in Canada) and MNRF, the water management structures on the site were redesigned. The redesign, together with enhanced construction procedures (including an enhanced QCV/QA program, were approved by MNRF in November 2016 following which construction was recommenced.</p> <p>New Gold RRP is still awaiting approvals under the LRIA for various other structures, which are expected to be received in early 2017.</p>	Ongoing
188	<p>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 RRP.</p>	<p>No FMP annual reports were required or issued during 2016.</p>	N/A

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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"> <li>• The nature of the commitment;</li> <li>• To whom, or to what group or agency the commitment was made, if specific;</li> <li>• Whether the commitment is related to the EA process alone;</li> <li>• Whether the commitment is addressed or linked to a regulatory instrument, such as a regulation or environmental approval;</li> <li>• Any applicable timeline if any;</li> <li>• The status of the commitment; and</li> <li>• Additional actions required to fulfil the commitment.</li> </ul>	This registry addresses the master list of commitments.	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>The EMS is in development and ongoing. New Gold Corporate and the RRP have some environmental policies and procedures in place. During 2016, the EMS progressed more formally including an external gap analysis that was completed in 2016.</p> <p>A component of the EMS will manage and track the environmental aspects and impacts.</p> <p>Reviews of the implemented New Gold RRP EMS, procedures and policies will be completed once the EMS is finalized.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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.	During 2016, the EMS continued to be developed and ongoing. The EMS system continues to be developed using the ISO 14001 Standards and will include formal training programs and a focus on ongoing environmental compliance.	Ongoing
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.	During 2016, the EMS continued to be developed and ongoing. The EMS system continues to be developed using the ISO 14001 Standards and will include periodic management reviews of the RRP operation and continual improvement.	Ongoing
193	NG proposes to amend the Closure Plan periodically as more information becomes available and as required by the Ontario Mining Act.	No amendments were completed during 2016. New Gold RRP has been working on a Closure Plan Amendment but no amendments were completed in 2016. The Reporting period for this ACR is from March 31 <sup>st</sup> 2016 to December 31 <sup>st</sup> 2016.	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
194	<p>NG is proposing to work with Aboriginal groups including Rainy River First Nations, Naicatchewenin First Nation, Big Grassy River First Nation, Big Island First Nation, Naotkamegwanning First Nation, Ojibways of Onigaming First Nation and Métis community members to provide access to alternative private lands for the purposes of supporting TLU on such lands; and potentially providing compensation or incentives through collaborative agreements between the Aboriginal groups and NG. Access will be coordinated with the Aboriginal groups.</p>	<p>New Gold RRP has negotiated agreements with <i>Rainy River First Nations</i> (October 10, 2014), <i>Naicatchewenin First Nation</i> (October 10, 2014), <i>Big Grassy River First Nation</i> (January 9, 2015) and <i>the Metis Nation of Ontario</i> (November 25, 2014).</p> <p>New Gold RRP continues to actively engage with <i>Big Island First Nation</i>, <i>Ojibways of Onigaming</i> and <i>Naotkamegwanning First Nation</i>.</p>	Ongoing
195	<p>NG will communicate with Aboriginal groups including Rainy River First Nations, Naicatchewenin First Nation, Big Grassy River First Nation, Big Island First Nation, Naotkamegwanning First Nation, Ojibways of Onigaming First Nation and Métis community members on traditional teachings and ceremony.</p>	<p>New Gold RRP hosts two annual ceremonies at site; additionally, Aboriginal liaison personnel meet with community members to discuss the project, activities, ceremony, etc.</p> <p>During 2016 the following was held onsite:            Fall Ceremony - Oct 19, 2016            Spring Ceremony - May 31, 2016            Blessing Ceremony - June 22, 2016</p>	Ongoing
196	<p>NG will review the BGRFN TK / TLU study and discuss accommodations of the cultural heritage sites identified.</p>	<p>This was addressed during Participation Agreement discussions.</p>	January 9, 2015

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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"> <li>• ROW to ensure excessive vegetation clearing is not conducted;</li> <li>• Appropriateness of equipment choice and maintenance of equipment to minimize environmental impacts;</li> <li>• Effectiveness of erosion control measures where applicable;</li> <li>• Construction activities and equipment operation, including refueling exercises;</li> <li>• Waste management, including wood waste from clearing and domestic wastes;</li> <li>• Monitoring of remedial actions associated with malfunctions and accidents (if any); and</li> <li>• Any requirements contained in environmental approvals and permits required to construct the transmission line.</li> </ul> <p>At a minimum, weekly inspections by a qualified person will occur of worksites and related areas, during clearing of the ROW and construction of the transmission line. Contractors will be required to have properly trained personnel to provide guidance to construction teams in the absence of the qualified environmental persons. The results of the inspections will be documented and follow-up actions, if any, delineated. Completion of follow-up actions will be confirmed during subsequent inspections. Inspection frequency will be increased should the need be identified. The duration of post-construction inspections, will depend on the results of the construction inspection. At a minimum, periodic aerial inspection will occur for environmental aspects during operation, coincident with other aerial surveys.</p>	<p>Monitoring of these aspects was completed during 2016 as applicable.</p> <p>New Gold RRP and the Contractor conduct weekly inspections during working periods.</p> <p>Work on the transmission line was completed in April 2016.</p>	Complete

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
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>New Gold RRP has several Participation Agreements / Impact Benefit Agreements in place which identify ongoing communication protocols:</p> <p><i>Rainy River First Nations</i> (October 10, 2014),  <i>Naicatchewenin First Nation</i> (October 10, 2014),  <i>Big Grassy River First Nation</i> (January 9, 2015), and,  the <i>Metis Nation of Ontario</i> (November 25, 2014).</p> <p>In addition, New Gold RRP provides regular updates through newsletters, public presentations and individual meetings and emails with community representatives.</p>	Ongoing
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 RRP has a Participation Agreement with the MNO (November 25, 2014) and continues with regular engagement on the RRP.	Ongoing
200	NG is committed to working closely with the area First Nations and the MNO. NG has provided resources to Aboriginal Groups to undertake traditional studies as well as technical reviews of both the Draft EA as well as the Draft Closure Plan. NG will continue to support First Nations as part of the EA process and as mine operations begin.	<p>New Gold RRP actively engages all Indigenous groups about the Rainy River project, through newsletters, face to face meetings, site tours, business opportunities and job postings.</p> <p>Condition 9 of the EA approval is being fulfilled, although the level of engagement is directed by the communities.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
201	NG will commit to clearing of flammable debris within a minimum 30 m buffer area.	During 2016, New Gold RRP cleared flammable debris and fuel sources (cut trees) within a minimum 30 m buffer to standing trees.	Ongoing
202	NG is committed to continuing to engage potentially affected stakeholders as development and operation of the RRP progresses. Local municipalities will be engaged specifically in regards to contingency and emergency response procedures, prior to construction start. MNRF coordination will be undertaken as appropriate.	<p>New Gold RRP engages stakeholders on a regular basis through presentations, newsletters, etc.</p> <p>Specific engagements during 2016 included:            Fort Frances Chamber of Commerce - Feb 11, 2016            Men's Breakfast Club - Aug 9, 2016            Confederation College - June 13, 2016            Community Presentation at the Emo Legion - Sept 15, 2016</p>	Ongoing
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.	<p>New Gold RRP will continue to work with local Aboriginal groups on the transfer of artifacts.</p> <p>No artifacts were found or transferred from the site during 2016.</p>	Ongoing

Condition / Tracking #	Description	Status 2016	Date Completed (where applicable) 2016
204	NG will develop an accommodation with local trapline holders that meets the needs of both the proponent and the trappers.	<p>New Gold RRP is developing access agreements with local trapline holders.</p> <p>During the construction phase, access to harvest areas will be limited for health and safety reasons.</p>	Ongoing
205	NG will enhance components of the Richardson Trail and mitigate the impacts in collaboration with local landowners.	New Gold will initiate this commitment during the operations phase of the development, as it will be much safer to access particular areas of the project at that time.	N/A