

## **14.0 COMMITMENTS**

Table 14-1 provides a summary of the commitments identified in the final Environmental Assessment (EA) Report, in accordance with the Federal Environmental Impact Statement (EIS) Guidelines and Provincially-approved Amended Terms of Reference (ToR).

Table 14-2 list the commitments made by RRR following from the independent technical review of the draft EA Report (Version 1) on behalf of Aboriginal groups.

The commitments identified are specific, achievable, measurable and verifiable commitments per the EIS Guidelines, and include commitments relating to:

- Impact management measures (such as mitigation measures);
- Additional works and studies to be carried out;
- Monitoring;
- Public consultation and contingency planning; and
- Documentation and correspondence.

**Table 14-1: EA Report Commitments Registry**

<b>Commitment</b>	<b>EA Report Section</b>	<b>Status</b>
Document and respond to comments, issues or concerns.	3.3 to 3.6 App D1 to D-3, D-8, D-11 (and others)	Ongoing
Distribute copies of a draft Environmental Assessment (EA) Report for 30 day reviews - hard copies available at strategic public locations and available for downloading from the RRP webpage.	3.4.4 App D-4, D-5, D-9	Complete
The Métis Nation of Ontario is in the process of completing a TK / TLU study and technical review of the RRP EA Report. RRR anticipates that as part of the consultation process with the MNO an addendum outlining any follow-up programs or agreements may need to be submitted in parallel with the final EA Report review.	3.4.3.1	Ongoing
RRR 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.	3.4.3.1	Ongoing
Big Grassy River First Nation undertook a second independent review of the draft EA Report provided to the RRR on October 18, 2013. The review concluded that additional work with the community was required and RRR has committed to continuing the close engagement with the community in support of the RRP development.	3.4.3.2	Ongoing
Post a Notice of Public Information Event(s) to invite stakeholders and Aboriginal groups to be updated on the Rainy River Project (RRP) and EA process and findings. Host two Public Information Events, one in the Township of Chapple (Barwick) and at another local venue. Offer to host Public Information Events or open houses in each of the Aboriginal communities that Rainy River Resources (RRR) is to consult.	3.4.5, 3.4.8	Complete
A copy of the final EA Report will also be uploaded to the RRP website after Federal conformity review.	3.4.11	Complete
Surface water runoff will be diverted from entering the pit or flowing through stockpiles by ditching or other means.	4.3.2.2, 4.6.2, 4.12.7, 4.12.7.2, 4.12.7.4	Ongoing
Open pit dewatering water will be contained and if necessary, treated before it is discharged to the environment.	4.3.2.2, 4.5 App W-1	Ongoing
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.	9.3.1.2	Ongoing
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.	4.19.1, 7.6.1.3 App E App W-1	Ongoing

Commitment	EA Report Section	Status
West Creek Diversion will be positioned far enough from the pit perimeter to ensure the integrity and stability and is expected to provide like-for-like fish habitat replacement.	4.3.2.2, 4.12.7.4	Ongoing
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 Metal Mining Effluent Regulation discharge requirement for total suspended solids.	4.3.3, 4.6.2, 4.12.7, 7.21.3, 9.2.5.2 App W-1	Ongoing
A detailed mine rock segregation program / management strategy will be developed around the distribution of non-potentially acid generating (NPAG) and potentially acid generating (PAG) materials, and a program of ongoing testing to be carried out during mining operations of the mine rock being removed.	4.6.2	Ongoing
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.	4.3.2.1, 4.19.2, 7.8.3, App E	Ongoing
Encapsulation of the east mine rock stockpile under a multi-layered cover is proposed with a long term goal of controlling acid rock drainage.	4.19.2	Ongoing
Runoff and seepage from the tailings management area and stockpiles will be captured, monitored, and either released to the environment if applicable criteria are met and/or re-used in the process plant during operations. Cyanide and metal concentrations in the tailings management area 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 tailings management area ponds.	4.3.2.2, 4.6.2, 4.12.7, 4.12.7.2, 7.21.3, AppW-1	Ongoing
Generally abiotic conditions will be created within the fenced tailings management area during operations to limit the interest of the pond to waterfowl.	7.12.3	Ongoing
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.	9.3.3.2	Ongoing
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.	4.19.3, 7.10.3, App E	Ongoing
The tailings management area dams will meet strict regulatory requirements including the requirements of the Provincial <i>Lakes and Rivers Improvement Act</i> 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.	9.2.4.2, 9.2.4.3, App W-1	Ongoing

Commitment	EA Report Section	Status
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.	4.7.6, 4.7.7, 4.13, 4.14, 9.3.5.2, 9.3.8, 9.3.9.2	Ongoing
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.	4.5, 4.13, 7.21.1.3, 7.21.3, 9.3.4.2, 9.3.5.2, 9.3.6.1	Ongoing
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.	4.5, 4.12.1, 4.14, 7.5.1.1, 7.6.1.2, 7.21.3, 9.4.1.2 App W-1	Ongoing
Generate a reliable water source for process plant operations and ancillary uses 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.	4.12.2, 7.6.3, App W-1	Ongoing
Water will be taken from the Pinewood River for the purpose of developing an initial water inventory, only during the construction phase. RRR does not intend to take water directly from the Pinewood River thereafter, except possibly for contingency purposes.	4.12.2, App W-1	Ongoing
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 tailings management area, so as not to mix the natural creek water with excess water discharged from the tailings management area.	4.12.4, 7.5.1.3, App W-1	Ongoing
The re-aligned Highway 600 will be constructed by RRR to Ministry of Transportation standards so that RRR can pursue transfer of the road to the Province after construction.	4.15, App W-1	Ongoing
A new East Access Road will connect Highway 71 with Roen Road by means of Korpi Road, to provide access for the limited number of properties on Marr Road north of the RRP site.	4.15, App W-1	Ongoing

Commitment	EA Report Section	Status
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). 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.	4.16, 4.18, 7.11.3, 7.12.3, 7.15.3.3, 7.16.3	Ongoing
The site will be rendered suitable for other compatible land uses and functions after the mine has closed and the land has been reclaimed. RRR 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 Species at Risk (SAR) species, most notably whip-poor-will, and other species of interest, if practical.	4.1, 4.3.2.1, 4.19.1, 4.19.2, 7.8.3, 7.9.3	Ongoing
The RRP will monitor and mitigate air emissions, particularly dust, through implementation of current industry best management practices.	7.3.1.2, 7.3.1.3, 7.8.3	Ongoing
A fugitive dust best management practices plan will be prepared to identify all potential sources of fugitive dusts, outline mitigative measures that will be employed to control dust generation, and detail the inspection and recordkeeping required to demonstrate that fugitive dusts are being effectively managed.	7.3.1.3	Ongoing
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 leks surrounding high traffic areas of the mine.	7.4.1.3, 7.12.3, 7.14.3, 7.15.2.3, 7.15.3.3, 7.16.3, 7.18.4.1	Ongoing
Should the final equipment selections determine through detailed engineering and sound level assumptions made herein vary materially from those presented in the EA, an updated assessment with the new information will be prepared as part of the detailed design and approvals application(s) for the RRP.	7.4.1.3	Ongoing
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.	7.4.2.3	Ongoing
RRR 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.	7.18.4.3	Ongoing

Commitment	EA Report Section	Status
A No Net Loss Plan and compensation strategy will be developed and implemented by RRR to create new like for like habitats as project compensation and/or enhance existing restoration programs, to offset the RRP habitat losses.	7.5.3, 7.5.4, App X-1, X-2, X-3	Ongoing
Except where aquatic habitat will be overprinted (and compensated for as part of Fisheries and Oceans Canada 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.	7.11.3	Ongoing
Wildlife awareness information will be included in regular safety and environmental inductions performed by the mine, along with Species at Risk 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.	7.9.3, 7.10.3, 7.13.3, 7.15.1.3, 7.15.2.3, 7.16.3	Ongoing
Road-killed animals or any other carcasses found onsite will be removed in a timely manner to limit the attraction of wildlife.	7.13.3	Ongoing
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).	7.14.3	Ongoing
Alter the RRP footprint through consultation with the MNR 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).	7.15.1.3, 7.16.3	Ongoing
Implement a monitoring plan for Eastern Whip-poor-will populations and nesting in proximity to the proposed mine and transmission line sites, within compensatory habitat areas. Continue funding external research programs in collaboration with the MNR in order to further our understanding of this poorly studied species, as part of a larger overall benefits compensation package required by the <i>Endangered Species Act</i> permit.	7.15.1.3	Ongoing
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.	7.15.2.2, 13.7.1, 13.7.3	Ongoing
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.	7.15.3.3	Ongoing
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).	7.15.1.3, 7.16.3	Ongoing

Commitment	EA Report Section	Status
RRR 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. RRR will provide continuous, on the job safety training.	7.19.3	Ongoing
As the mine approaches the end of mine life, RRR will implement strategies to transition the workforce to buffer the effects of job losses, as well as an Adjustment Committee.	7.19.3	Ongoing
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. RRR 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.	7.20.2.3	Ongoing
Develop suitable policies and initiatives to encourage car pooling amongst employees, with the aim of reducing commuter-related traffic and reducing the individual burden of commuting. RRR may explore alternate accommodation strategies to support its employees.	7.20.2.3, 7.20.5.1, 7.20.5.3	Ongoing
RRR will continue to discuss the RRP and potential additional demands that could be placed on the services of regional Municipalities. RRR will continue to support government-led initiatives that support social sustainability during all project phases. RRR 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. RRR will maintain communications with local and regional service providers to monitor and work collaboratively to address any Project-related changes that may be experienced.	7.20.3.3, 7.20.4.3	Ongoing
RRR 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 issues with MTO, the Township of Chapple, Stratton, the Rainy River Valley Safety Coalition, school bus operators, utility companies and emergency response groups.	7.20.5.3	Ongoing
RRR 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.	7.20.5.3	Ongoing
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.	7.21.3	Ongoing
Environmental monitoring will be conducted in accordance with standard practice and regulatory requirements, including any site-specific environmental approvals.	7.21.3, 13 (and others)	Ongoing
All final discharge points have a point of control to immediately cease discharge. All discharge locations will be regularly sampled in accordance with environmental approval requirements and will provide insight as to ongoing treatment system performance.	4.12.1, 7.21.3, 9.4.1.2	Ongoing

<b>Commitment</b>	<b>EA Report Section</b>	<b>Status</b>
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.	7.21.3	Ongoing
RRR 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.	7.23.3	Ongoing
Should it be determined in the future that additional fire break is required, appropriate approvals will be obtained from the MNR.	8.4.3	Ongoing
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.	9.1 App V	Ongoing
Pond dams will be inspected on 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 on an interval that meets regulatory requirements at a minimum.	9.2.5.2	Ongoing
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.	9.3.4.2, 9.3.6.2	Ongoing
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.	9.3.4.2, 9.3.6.2	Ongoing
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.	4.5, 4.7.7, 4.13, 4.19.1, 9.3.4.2, 9.3.5.2, 9.3.6.2, 9.3.8, 9.3.9.2	Ongoing
Procedures will be regularly reviewed as part of the environmental management system.	9.3.5.2, 13.14	Ongoing
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.	7.21.3, 9.3.4.2, 9.3.6.1, App V	Ongoing
Notification and/or reporting of any vehicular accidents and spills will follow Provincial (Ministry of the Environment) and other applicable requirements.	9.3.7.1	Ongoing
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.	4.7.7, 9.3.8	Ongoing

Commitment	EA Report Section	Status
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.	9.4.3.2, App V	Ongoing
Monitoring details 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.	13.1	Ongoing
Subject to acceptance in writing of the Follow up Monitoring Program (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.	13._4	Ongoing
<p>A list of follow up monitoring program (FMP) commitments made during the EA process will be maintained, 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>	13, 14	Ongoing
Environmental aspects and potential impacts of the project will be managed within an environmental management system which integrates environmental performance with overall project management.	13.14	Ongoing
Implementation and maintenance of the environmental management system will be driven by the RRR 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.	13.14	Ongoing
Periodic management reviews will completed to consider changing circumstances which could affect the continued suitability and adequacy of the plans, and to support continual improvement in overall effectiveness.	13.14	Ongoing

'\_' Underscore is used in referencing multiple sections, to reflect the heading level that sequentially changes (for example: S7.\_1, represents S7.1.1, 7.2.1, 7.3.1,...)

**Table 14-2: Commitments Resulting from the Independent First Nations Review of the Draft EA Report (Version 1)**

Commitment	Status
<p>Traditional Knowledge/Traditional Land Use (TK / TLU) data has been widely collected for the RRP, including from the closest communities of Big Grassy River First Nation, 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. No TK / TLU data has been identified for the Project area specifically. The majority of the data has been broad and overreaching, which Rainy River Resources (RRR) will continue to respect as it serves as the basis for First Nations' unique relationship to the land.</p> <p>TK/TLU collection will continue; information collected will be appropriately considered for construction, operation and closure phases. For example, RRR will further investigate the historical travel corridor and incorporate appropriately any new information that may become available.</p>	Ongoing
<p>RRR will share results of the TK/TLU data sessions in a non-public First Nations forum(s).</p>	Ongoing
<p>RRR will commit to a joint water quality monitoring and reporting program with the area First Nations as part of the existing monthly water quality monitoring program which is currently carried out by RRR. The program will be funded by RRR 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.</p>	Ongoing
<p>RRR will continue to communicate closely with First Nations regarding the Project.</p>	Ongoing
<p>RRR has an open invitation for First Nations to participate in all baseline and environmental monitoring programs, including Whip-poor-will, where appropriate and to share monitoring results. RRR will continue to advise of the opportunity at public forums in order to encourage anyone who's interested to participate.</p>	Ongoing
<p>All RRR 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.</p>	Ongoing
<p>Additional information related to Lake Sturgeon and the Rainy River First Nations management program will be added to the Final EA Report.</p>	Ongoing
<p>RRR 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 River and similar agriculturally-impacted waterways.</p>	
<p>RRR will reach out to the Seven Generations Education Institute and/or the MNR to obtain any additional information on baseline health of animals and fish.</p>	Ongoing
<p>First Nations 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, RRR will consult on significant revisions periodically during operations to ensure incorporation of TK and best management practices.</p>	Ongoing
<p>Monitoring programs targeted at ungulates (moose, deer) will be coordinated with First Nations.</p>	Ongoing
<p>RRR 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.</p>	Ongoing
<p>While the Draft EA has shown no impacts to First Nations or non-Aboriginal people's health, any new information that has a potential to impact health will be provided to First Nations.</p>	Ongoing
<p>RRR will work with First Nations to ensure employee overall well-being. Programs to highlight the dangers of drug use combined with drug testing will be implemented.</p>	Ongoing