

 <b>NEWFOUND GOLD CORP</b>	<b>NEW FOUND GOLD CORP. ENVIRONMENTAL PROTECTION PLAN Mineral Exploration Queensway Gold Project</b>	<b>Version: 1.0</b>
		<b>Date: April 2021</b>



# Environmental Protection Plan

## Mineral Exploration Activities Queensway Gold Project

New Found Gold Corp.  
300 Garrett Drive  
Gander, NL, A1V 0H5

April 2021



**NEWFOUND  
GOLD CORP**

**NEW FOUND GOLD CORP.  
ENVIRONMENTAL PROTECTION PLAN  
Mineral Exploration  
Queensway Gold Project**

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## 1.0 INTRODUCTION

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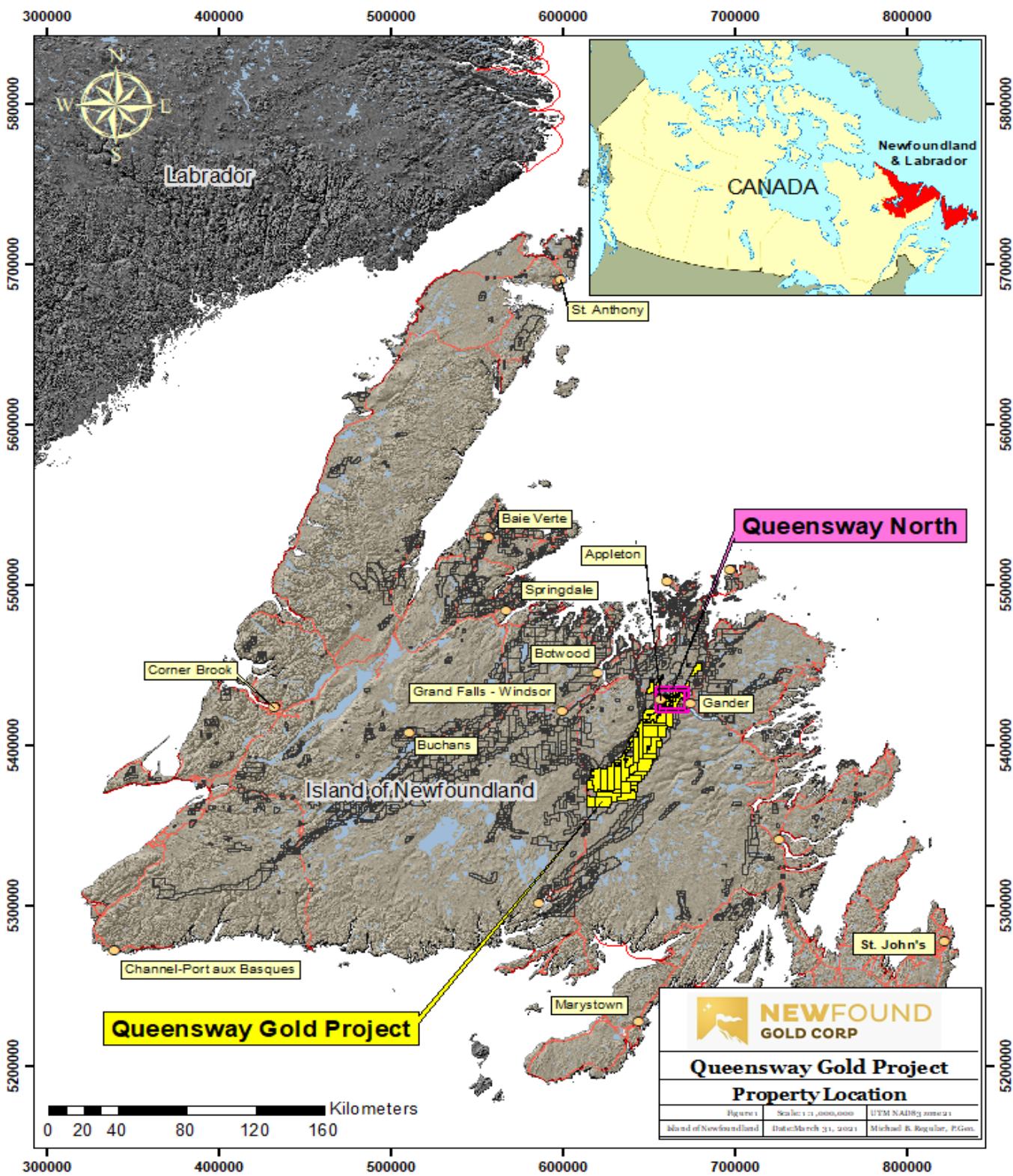
New Found Gold Corp. (NFGC) is a publicly traded mineral exploration company (NFG:TSX-V) exploring for gold in the central portion of the Island of Newfoundland (Figure 1). The Queensway Gold Project consists of 6041 claims as part of 86 Mineral Licences covering an area of 1510 km<sup>2</sup> or 151,000 hectares (ha) (Figure 2). The Queensway North Gold Project, the focus of more advanced mineral exploration, consists of the northern extents of the Queensway Project and is located approximately 15 kilometers (km) west of the Town of Gander, and just east of the Town of Appleton in central Newfoundland (Figure 1). Other properties associated with the Queensway Gold Project include Twin Ponds and Queensway South. Exploration work is ongoing at all three properties.

This EPP is applicable to mineral exploration activities relative to the Queensway Gold Project (the Properties) and will be updated as required to reflect ongoing activities in the various Queensway exploration areas. NFGC has been conducting various mineral exploration work at the Properties since early 2016. Prior intermittent gold exploration work was conducted by various companies dating back to the early 1980s. NFGC is planning to conduct additional mineral exploration work at the Properties and commits to conduct work in a manner that limits the potential for adverse environmental impacts.

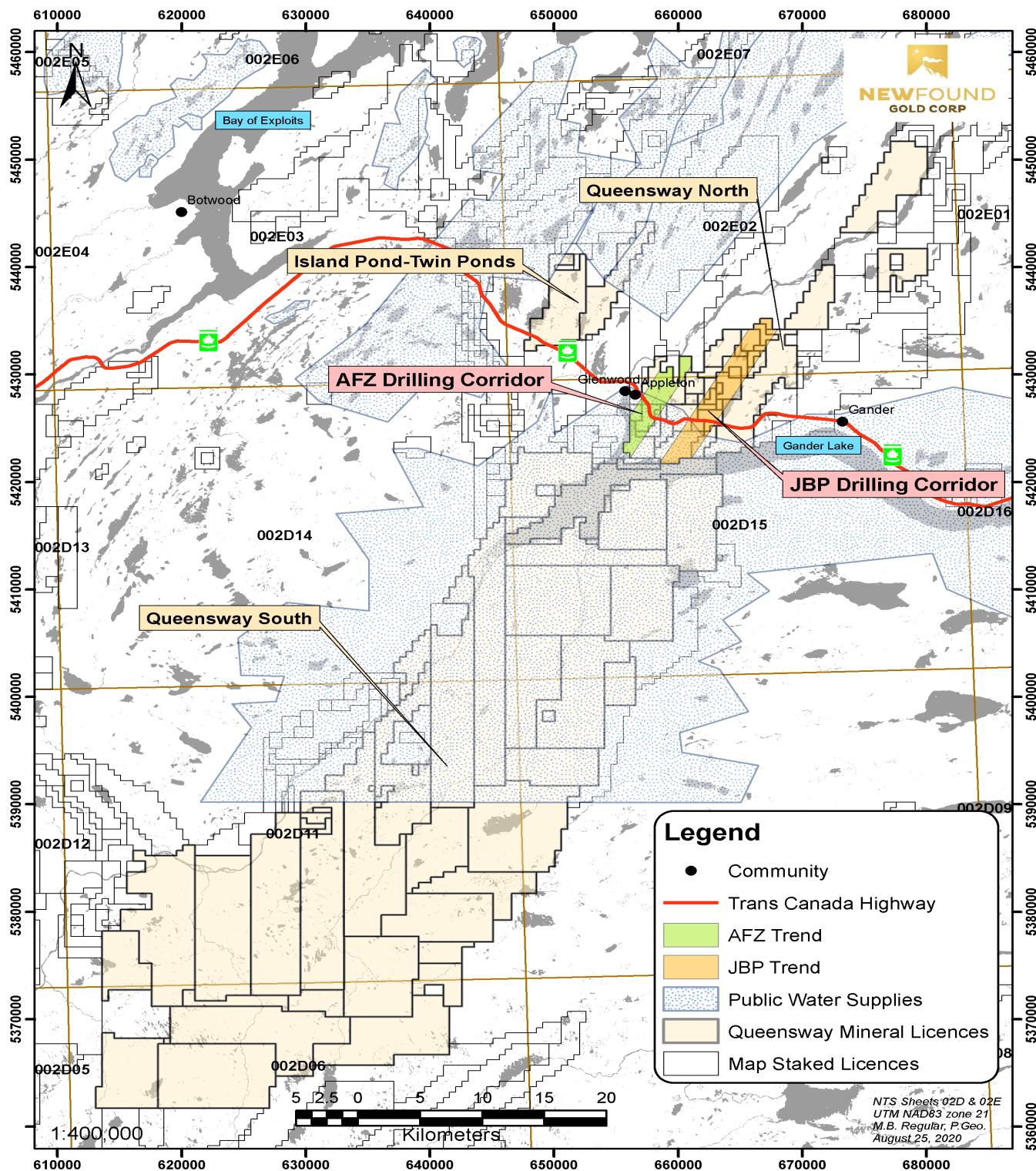
### 1.1 Purpose of the EPP

The purpose of the EPP is to outline potential environmental concerns and protection procedures related to the exploration activities carried out on the Properties. This EPP also outlines practical procedures required for exploration personnel (i.e., NFGC employees, contractors and suppliers) to limit potential adverse environmental effects, as well as instructions for addressing planned and unplanned activities or events associated with ongoing exploration work. NFGC will implement best management practices to aid in the mitigation of concerns identified.

**Figure 1: Queensway Project Location**



**Figure 2: Queensway Properties on the Island of Newfoundland**



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## 1.2 Objectives of the EPP

To ensure exploration activities are carried out in an environmental responsible manner, this EPP has the following objectives:

- confirm commitments to limit adverse environmental effects are met;
- document environmental concerns and appropriate protection measures;
- provide a reference document for personnel when planning and/or conducting specific activities;
- provide direction in the event of accidental events;
- communicate changes in the EPP through the revision process;
- serve as a reference for NFGC personnel and regulators to monitor compliance and recommend improvements, and
- provide direction at the corporate level for ensuring commitments made in the EPP are implemented and monitored.

Deviations from the procedures and commitments outlined in this EPP will be discussed with and approved by NFGC.

## 1.3 Roles and Responsibilities

This section outlines the roles and responsibilities of parties involved with the on-going exploration activities on the Properties.

### 1.3.1 Senior Project Manager

NFGC's Senior Project Manager or designate will provide overall leadership and support of the EPP during exploration activities carried out on the Properties. Specific responsibilities include:

- provide final approval for the EPP and subsequent revisions;
- monitor and inspect work associated with the exploration activities;
- liaise with relevant government agencies and stakeholders as required;
- distribute the EPP and revisions to appropriate individuals noted in Appendix B;
- manage reviews of the EPP on an as-needed basis, and
- maintain overall document control.

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### 1.3.2 Field Manager

NFGC's designated Field Manager will report directly to the Senior Project Manager and manage activities carried out on the Properties. Specific duties include:

- act as NFGC's representative on-site and be responsible for overall environmental protection;
- hold initial orientation sessions for contractors and other personnel to be involved in exploration activities;
- confirm employees and contractors/sub-contractors on-site are familiar with the EPP contents and are able to implement all aspects of the EPP, including revisions and procedures;
- communicate proposed work activities to the Senior Project Manager to ensure applicable approvals, authorizations and permits can be obtained in a timely manner;
- monitor, or designate a representative to monitor, exploration work and environmental protection measures to maintain compliance with the EPP, and regulatory requirements and commitments;
- report to Senior Project Manager incidents of environmental non-compliance;
- support and/or manage periodic reviews of the EPP; and
- contact the appropriate regulatory agencies in the event of an environmental emergency.

### 1.3.3 Other Site Personnel and Contractors

Contractors, subcontractors and site personnel involved in exploration activities on the Properties will:

- review and become familiar with procedures outlined in the EPP, including revisions;
- follow and implement commitments noted in the EPP, including regulatory conditions noted in approvals, authorizations and permits;
- immediately report concerns, including spills or other event that may have an adverse effect on the environment, to NFGC's Field Manager or designate;
- carry out clean-up, reclamation or restoration as directed by NFGC's Field Manager or regulatory agencies; and
- provide feedback to NFGC's Field Manager regarding revisions that could improve the EPP.

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## 1.4 Orientation

Through ongoing orientation and awareness training, NFGC will confirm that exploration personnel understand their roles and responsibilities, as well as the potential environmental effects of overall exploration and their specific work activities. Workers will receive an orientation from an immediate supervisor prior to the start of a new activity and thereafter on an as-needed basis. New personnel arriving at the properties will receive an orientation, to be given by NFGC's Field Manager or designate.

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## 2.0 EXPLORATION ACTIVITIES

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The following activities will be carried out on the Properties:

- Up to 200,000 metres (m) of core drilling in up to 1,500 drill holes in the Appleton Fault Zone, Joe Batts Pond Fault Zone and areas south of Gander Lake;
- Trenching in selected areas where anomalous gold numbers have been indicated from both grab rock samples and till sample surveys;
- Airborne and ground based geophysical surveys over new ground or untested ground;
- Geochemical surveys combined with prospecting and mapping;
- Geophysical interpretation and spectral interpretation of lithologies from core and imagery; and
- Line cutting for Induced Polarization (IP) surveys; and
- Limited seismic surveys.

Exploration work will require the creation of drill pads and access trails extending from existing forest access roads and trails. Drill pads are areas cleared of brush and trees (15 m radius), by using forestry mulchers to allow the operation of an exploration drill rig. Drill access trails are temporary trails (<5 m) cleared of brush and trees by mulching to allow access to the drill pads.

Access to the exploration areas will be via existing access roads and trails, where possible and practical. If additional access trails are required during the exploration program a route will be selected to ensure minimal disturbance to the existing environment and NFGC will adhere to requirements outlined in applicable permits, approval and/or authorizations during exploration activities. The EPP will be revisited and reviewed with respect to ongoing exploration activities, as required.

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## 3.0 REGULATORY REQUIREMENTS

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### 3.1 Potential Approvals, Permits and/or Authorizations

Regulatory approvals, permits and/or authorizations are required for exploration activities. Conditions and expiry dates of approvals, permits and/or authorizations will be considered in this EPP, and personnel will be familiar with, and adhere to, requirements of approvals, permits and/or authorizations.

A general list of permits, approvals and/or authorizations that may be required for exploration activities on the Properties are presented in Table 3.1.

**Table 3.1 Potential Permits, Approvals and/or Authorizations**

Department/Agency	Approval/Permit/Authorization	Exploration Element
<b>Federal</b>		
Department of Fisheries and Oceans (DFO)	Self-assessment, Authorization for works in fish bearing waters	Installation of bridges and/or culverts
<b>Provincial</b>		
NL Power and NL Hydro		Permission to work around powerlines and transmission lines
Department of Fisheries, Forestry and Agriculture (DFFA), Forestry Branch	<ul style="list-style-type: none"> <li>• Cutting permit</li> <li>• Permit to burn</li> <li>• Operating permit</li> </ul>	Clearing for trails, drill pads
Department Industry, Energy and Technology (DIET), Mines Branch, Mineral Lands Division	Exploration Approval	Ongoing exploration work
DECC, Water Resources Management Division (WRMD)	Permit to Alter a Body of Water Section 48 <ul style="list-style-type: none"> <li>• Fording</li> <li>• Bridges</li> <li>• Culverts</li> <li>• Site Drainage</li> </ul>	Activities for work near or within a waterbody
	Water Use Licence	Water use
Department of Transportation and Works		Working within protected road corridors.
DFFA, Wildlife Division	Authorization to control nuisance animals	Exploration activity
Department of Digital Government and Service NL (DDGSNL), Service NL	Certificate of approval for storage and handling of gasoline and associated products	Storage, handling and transportation of fuel
	Temporary Fuel Cache	Fuel Storage

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## 3.2 Environmental Compliance Monitoring

### 3.2.1 Site Inspections

Site inspections will be conducted by company personnel before, during and after site disturbances related to exploration activities performed by NFGC, or contractors on behalf of NFGC. For site inspections conducted prior to exploration activity, site details including vegetation, general terrain/topography and drainage patterns will be recorded. Photographs should be taken during each site inspection. The required frequency of site inspections performed during exploration activities will be determined by the Field Manager or designate and will depend on the duration and type of activity being performed. Where conditions permit, drone imagery will also be collected.

Regular site inspections will aid in the implementation of the environmental protection measures that are specified in this EPP and that will be specified in the applicable contracts and other relevant permits, approvals and/or authorizations.

Environmental issues or concerns should be reported to the NFGC Field Manager or designate.

### 3.2.2 Monitoring

Monitoring will confirm that exploration activities comply with applicable regulatory requirements and that mitigation measures are being employed effectively. NFGC's Field Manager or designate will be responsible for on-site environmental compliance monitoring during exploration activities.

Compliance monitoring will be required for various activities during exploration (e.g., monitoring of site drainage). Compliance standards that may apply to exploration activities include, but are not limited to, those listed in Table 3.2. Personnel will comply with relevant permits, approvals, authorizations and legislation while conducting exploration work.

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**Table 3.2 Environmental Compliance Standards**

Legislation/ Guidelines	Activity Requiring Compliance	Responsible Agency	Comment
<b>Federal</b>			
<i>Canada Fisheries Act, Deleterious Substances, S.36(3)</i>	Run-off from the exploration site to receiving waters	Environment and Climate Change Canada (ECCC)	Deposited substances or discharges must not be deleterious (i.e., acutely non-lethal). Liquid effluents that enter freshwater or marine waters must comply with the Act.
<i>Species at Risk Act</i>	Mortality of endangered species or other species under federal authority.	ECCC	Measures taken to avoid or lessen adverse effects on species at risk (SAR). Mitigation measures will be consistent with recovery strategies and action plans for species.
<i>Migratory Birds Convention Act</i>	Mortality of migratory birds, and species under federal authority.	ECCC, Canadian Wildlife Service (CWS)	CWS should be notified about the mortality of endangered migratory bird in the exploration area, including passerine (songbirds), seabird and waterfowl species. Harmful substances such as oil and wastes that are harmful to migratory birds must not be deposited into waters that are frequented by them. Nests, eggs, nest shelters of migratory birds must not be disturbed or destroyed. Notice should also be given about the mortality of endangered species (under federal regulation).
<i>Transportation of Dangerous Goods Act and Regulations</i>	Handling and transporting of dangerous goods.	Transport Canada	If the materials are transported and handled fully in compliance with the regulations, a permit is not required. A Permit of Equivalent Level of Safety is required if a variance from the regulations is necessary.
<i>Canadian Environmental Protection Act</i>	Activities that have the potential to interact with the environment and human health.	ECCC	CEPA provides framework for setting environmental quality objectives, guidelines and codes of practice, pollution prevention plans, regulation of toxic substances, controlling pollution of other wastes and environmental emergency plans
<b>Provincial</b>			
<i>Environmental Protection Act</i>	Exploration	Pollution Prevention Division (PPD), DECC	Waste material shall be considered, prior to disposal, for reuse, resale or recycling. Waste materials, associated with exploration shall be disposed at an approved waste disposal site.
	Exploration	PPD, DECC	Activities associated with exploration are subject to the <i>Air Pollution Control Regulations</i> . Materials stipulated in the Regulations cannot be burned in the open.
	Site drainage during exploration	PPD, DECC	Waters discharged from exploration sites must comply with the <i>Environmental Control Water and Sewage Regulations</i> .

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Legislation/ Guidelines	Activity Requiring Compliance	Responsible Agency	Comment
	Storage, handling and disposal of gasoline and other fuels.	Service NL (DDGSNL)	Petroleum storage and handling is subject to the <i>Storage and Handling of Gasoline and Associated Products Regulations</i> . Section 5.1 of the EPP addresses a Fuel and Hazardous Material Spills Contingency Plan.
	Disposal of used oil.	Service NL (DDGSNL)	The storage and disposal of used oil is subject to the <i>Used Oil Control Regulations</i> .
	Handling and storage of hazardous materials.	Service NL (DDGSNL)	Activities involving the use of designated hazardous materials are subject to Workplace Hazardous Materials Information System (WHMIS). WHMIS outlines procedures for handling hazardous materials and provides details on various hazardous materials.
<i>Dangerous Goods Transportation Act and Regulations</i>	Transporting fuel to the site.	Department of Transportation and Works	Transporting goods considered dangerous to public safety must comply with regulations.
<i>Historic Resources Act</i>	General exploration activities.	Provincial Archaeology Office (PAO), Department of Tourism, Culture, Arts and Recreation	Archaeology sites and artifacts are considered the property of the Crown and must not be disturbed. Archaeology materials encountered must be reported to the PAO.
<i>Forestry Act</i>	Cutting, burning, operating	Forestry Branch DFIA	Cutting and clearing of trees for exploration activities must comply with the Act.
<i>Minerals Act</i>	Exploration	Mines Branch, Mineral Lands Division, DIET	Exploration work must comply with the Minerals Act.
<i>Occupational Health and Safety Act &amp; Regulations</i>	Exploration	Service NL (DDGSNL)	Activities should comply with the <i>Occupation Health and Safety Act and Regulations</i> ,

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### 3.3 Rehabilitation of Exploration Work Sites

Once exploration activities are completed in an area, NFGC will begin rehabilitation. The general rehabilitation activities highlighted below follow guidance from the Mines Branch (DIET 1995). Where applicable, the rehabilitation process will include:

- stabilization of surface disturbances on an ongoing basis to limit erosion and promote natural revegetation;
- natural revegetation of surface disturbances will be encouraged, and active revegetation will be pursued where this is deemed critical, and where terrain and soil conditions permit;
- NFGC will incorporate environmental measures in tender documents, and require contractors to conduct their work in accordance with this EPP;
- dismantling and removal of temporary surface infrastructure (e.g., site trailers, portable lavatories, fuel drums);
- handling of hydrocarbon and/or hazardous materials according to provincial and/or federal requirements;
- general ground surface contouring to establish permanent drainage patterns, minimize erosion, and promote public safety;
- replacement (where appropriate) of stockpiled overburden, or other suitable materials to encourage natural revegetation, and
- revegetation where applicable.

During exploration activities, terrain, soil and vegetation disturbances will occur only where necessary, and where possible, overburden and excavated rock will be stockpiled separately and reserved for rehabilitation work.

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### **3.4 Reporting**

#### **3.4.1 Internal Communication**

The NFGC Field Manager will be responsible for communicating policies, procedures, and legal and other requirements to exploration personnel. Exploration personnel will communicate environmental incidents to NFGC's Field Manager as per the Reporting Procedures.

#### **3.4.2 External Communication**

When required, NFGC, through the Senior Project Manager, will report on environmental issues relating to exploration activities to the DECC.

Spills of petroleum products or other hazardous materials will be reported to:

**Environmental Emergencies 24 Hour Report Line (Coast Guard Traffic Centre, St. John's)**  
(St. John's: **709-772-2083** or Other Areas: **1-800-563-9089**); and

**Petroleum and Environmental Services Inc., (Appleton: 877- 449-2335)**

NFGC notes the difference between reportable spills on-land versus in freshwater environments. Other compliance reporting required by permits or through compliance requirements not listed above will be submitted to the DECC.

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## 4.0 ENVIRONMENTAL PROTECTION PROCEDURES

The various environmental protection procedures for exploration-related activities are described below. As required, this EPP will be revised to include new or amended environmental protection procedures so that exploration activities are completed properly.

### 4.1 Surveying

#### Potential Environmental Concerns

Surveying activities could potentially disturb wildlife species, vegetation and historic resources.

#### Environmental Protection Procedures

- a) Width of survey lines for IP will be limited to 1.5 m or less.
- b) Width of survey lines for seismic will be the minimum needed, e.g., <3 m.
- c) Whenever possible, cutting lines to the boundary between treed and open areas will be avoided and flagged lines will be used to mark buffer areas.
- d) Trees and shrubs will be cut flush to the ground wherever possible.
- e) Cutting of survey lines will be kept to a minimum. Where possible, alternate areas not requiring cut lines will be used.
- f) Trees not exactly on transit lines will be left standing.
- g) No attempt to harass or disturb wildlife will be made by workers.
- h) Vehicles will yield the right-of-way to wildlife.
- i) There will be no cutting in areas designated as sensitive without notification and approval of the Site Manager.
- j) No motorized vehicles will enter the areas designated as sensitive without notification and approval of the Field Manager or as dictated by permits.
- k) Historic resource discoveries will be reported to the PAO.
- l) Sites where surface disturbances are planned or may occur will be inspected and monitored prior to, during, and after the work.
- m) The use of ATVs will be restricted to designated trails, thus minimizing ground disturbance - except as approved by the Site Manager or as dictated by permits. ATV use will comply with the Motorized Snow Mobile and All-Terrain Vehicle Regulations, 1996 under the *Motorized Snow Mobile and All-Terrain Vehicle Act* and the Environmental Guidelines for Stream Crossings by ATV issued by the DECC.

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## 4.2 Buffer Zones

### Potential Environmental Concerns

Buffer zones are boundaries of undisturbed vegetation maintained along water bodies or other sensitive landscape features. Without adequate buffer zone vegetation, streams, ponds and lakes can potentially become laden with silt from run-off. Vegetation also provides cover for fish in various aquatic environments.

### Environmental Protection Procedures

A minimum buffer zone of 30 m of undisturbed natural vegetation will be maintained between exploration work areas and water bodies, visible on a 1:50,000 topographic map. Where recommended or required, additional buffer widths will be maintained according to Table 3.3. For watercourses that are licensed salmon rivers, NFGC will work with public and regulatory bodies to promote and maintain the health of these important habitats.

**Table 3.3 Recommended Buffer Zones for Queensway Project Exploration Work**

Activity / Feature	Recommended Buffer Width	Source
Activities around watercourses/bodies visible on a 1:50,000 topographic map	30 m	WRMD
Activities around the Gander River	100 m	WRMD/PAO
Main tributaries of Gander Lake	100 m	WRMD
Gander Lake	300 m	WRMD/PAO
Public Protected Water Supplies	Defined boundary	WRMD
Resource roads or highways running adjacent to water bodies	20 m + 1.5 X slope (%)	Gosse et al.
Piling of wood and slash – Grubbing	30 m	Gosse et al.
Placement of Temporary Site Trailers - Fuel storage	100 m	Gosse et al.
T'Railway Provincial Park	50 m either side	DTCAR

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#### **4.3 Laydown and Storage Areas**

##### **Potential Environmental Concerns**

Laydown areas may be necessary for storing and maintaining equipment and supplies during exploration activities. Potential erosion and run-off of sediment into nearby water bodies will be prevented.

##### **Environmental Protection Procedures**

- a) Existing laydown and storage areas will be used where feasible.
- b) New laydown, maintenance or storage areas required for exploration activities will be established within the claim boundaries.
- c) Establishing new laydown or storage areas will follow the procedures for vegetation clearing/grubbing (Section 4.4 and 4.5) and erosion prevention (Section 4.6).
- d) External storage areas will be placed on level terrain and kept free of ponding or run-off.
- e) Drainage from areas of exposed soil will be controlled by grade or ditching and by directing run-off away from water bodies.
- f) Laydown and storage areas no longer required for exploration activities will be rehabilitated.
- g) Fuel will be stored, handled and transported according to Section 4.14.

#### **4.4 Clearing Vegetation**

##### **Potential Environmental Concerns**

Vegetation clearing of trees and shrubs may be required in advance of trail creation, drill pad preparation and for surveying. Potential concerns include stockpiling vegetation in or near watercourses and wildlife disturbance.

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## Environmental Protection Procedures

- a) Clearing activities will comply with the requirements of all applicable permits. No burning will occur.
- b) All cleared vegetation and trees will be mulched.
- c) Clearing or removal of trees will be kept to a minimum.
- d) Clearing will consist of cutting to within 15 cm of the ground or as dictated by permits and disposing of standing trees, as well as removing shrubs, debris and other vegetation from the area indicated on the exploration program drawings. These materials will be stacked clear of on-going exploration activities for future rehabilitation. The *Environmental Protection Guidelines for Ecologically Based Forest Resource Management* (DFRA 1998) will be followed.
- e) If merchantable or usable timber is encountered, it will be removed by a local contractor.
- f) Disposing of cleared un-merchantable timber, slash and cuttings by burning will comply with the *Forest Fire Regulations, 1996* (amended 2002) under the *Forestry Act*, Environmental Code of Practice for Open Burning and the Permit to Burn (from the Newfoundland and Labrador Department of Natural Resources Forestry Branch). At no time will a fire be left unattended.
- g) Slash and other material or debris related to exploration activities will not be permitted to enter watercourses and will be piled above spring flood levels.
- h) Chain saws or other hand-held equipment will be used in clearing vegetation.
- i) Appropriate buffer zones of undisturbed vegetation will be maintained between exploration activities and waterbodies, and other landscape features as noted in Table 3.3.
- j) Timber shall be felled inward toward the work area to avoid damaging standing trees within the immediate work area.
- k) Workers will not destroy or disturb features indicative of a cultural or archaeological site. Such features should be avoided until a report has been made to the PAO and clearance to proceed has been received.
- l) Where feasible, vegetation clearing will be scheduled to avoid disturbance during the critical bird nesting period.
- m) Bog mats will be used to limit disturbance to wetlands. Wetland disturbance will be avoided outside the work area.
- n) Sites where surface disturbances are planned or may occur, will be inspected and monitored prior to, during, and after the work.

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#### 4.5 Grubbing

##### Potential Environmental Concerns

Grubbing refers to the removal of the roots that remain in the soil after clearing. The main concerns associated with grubbing and disposal of related debris are the potential adverse effects on freshwater ecosystems and water quality through the release of sediment into watercourses, as well as the potential for disturbing historic resources.

##### Environmental Protection Procedures

- a) Grubbing activities will adhere to buffer zone requirements.
- b) Grubbing of the organic vegetation mat and/or the upper soil horizons will be restricted to the minimum area required.
- c) Nests, eggs, nest shelters of migratory birds or other wildlife should not be disturbed or destroyed. Efforts will be taken to complete clearing in these areas, if required, outside of the bird breeding season.
- d) Should additional clearing be required outside the breeding season and a nest is found, the following mitigative actions will be taken:
  - the nest site and neighbouring vegetation should be left undisturbed until nesting is completed; and
  - exploration activities should be minimized in the immediate area until nesting is completed.
- e) Topsoil and organics should be stored in low stable piles (i.e., 1 to 2 m). Surplus material will be stored or stockpiled for site rehabilitation and revegetation purposes.
- f) Measures will be implemented to reduce and control runoff of sediment-laden water during grubbing, and the re-spreading and stockpiling of grubbed materials. Where grubbed materials are re-spread or stockpiled, as many stumps and roots as possible will be left on the ground surface to maintain soil cohesion, dissipate the energy of runoff and promote natural revegetation. Erosion control measures will be implemented in areas prone to soil loss.
- g) Grubbed areas will be left exposed to the natural elements for as brief a time as possible to limit unnecessary erosion. Silt curtains may be used to prevent erosion from exposed areas.

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## 4.6 Erosion

### Potential Environmental Concerns

Eroded material could potentially cause siltation in water bodies, potentially impacting habitat for aquatic and terrestrial animals.

### Environmental Protection Procedures

- a) The disturbance of new areas will be minimized.
- b) Work will be conducted according to the conditions set out in regulatory permits, approvals and/or authorizations.
- c) Drainage ditches, if required, will be stabilized (e.g., lining with vegetation or rock, terracing, interceptor swales, installation of rock check dams, hay bales) to reduce soil erosion. These measures will be inspected and maintained following installation.
- d) Areas of exposed erodible soil will be stabilized, e.g., back-blading, grading and/or compacting, revegetation or other mitigation.
- e) If an inspection reveals that silt is entering a waterbody, further mitigative measures may be implemented to intercept run-off, e.g., temporary drainage ditches, siltation control (settling) ponds, ditch blocks/check dams or sediment dam traps. The necessary or appropriate measures will be determined in the field.
- f) Work and laydown areas will be monitored for erosion and appropriate repair action taken as necessary.
- g) Existing or new siltation control structures used will be monitored for excessive accumulation of sediment. Accumulated sediment will be removed from control structures to gain full effectiveness of the systems. Effluent from control structures will be released to flow overland for appropriate filtration prior to entering waterbodies.

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#### 4.7 Water Withdrawal/Supply

##### Potential Environmental Concerns

The potential environmental concerns related to water withdrawal relate to potential adverse effects to the terrestrial and aquatic habitats in and around the subject waterbody.

##### Environmental Protection Procedures

- a) The water intakes will have an appropriate screen to prevent damage to fish. Guidelines for the screening of water intakes are provided by DFO.
- b) Mitigation specific to the use of Pumps and Generators and Dewatering Work Areas and Site Drainage are relevant to the supply of Project water and will be implemented as needed.

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## 4.8 Watercourse (Stream) Crossings

### Potential Environmental Concerns

The potential environmental concerns associated with stream crossings and culvert installations include direct disturbances and/or mortality of fish, and potential loss of fish habitat resulting from sedimentation and removal of habitat and stream bank vegetation. An evaluation of soil erosion potential will be conducted at each stream crossing. The assessment of soil erosion potential will assist in the development of specific erosion stabilization methods, and effective sedimentation control practices on a site-specific basis.

### Environmental Protection Procedures

No work below the high water mark of surface water features will be conducted without prior notification and assessment by the Field Manager. Stream crossings will be constructed in compliance with the required Permit for Culvert Installation from the Water Resources Management Division (WRMD), DECC, and required approvals other regulatory agencies. If fording is required, a Fording Permit will be obtained from DECC and the conditions followed.

The following measures will be implemented to minimize potential impacts to stream crossings:

- a) Between September 15 and June 15 (i.e., typical sensitive fish life stages) or other sensitive periods specific to the region, stream crossing during exploration activities will be undertaken under the direct supervision of the Site Manager.
- b) Avoid the entry of deleterious substances (e.g., sediment and fuel) to watercourses and waterbodies during watercourse crossing work.
- c) If culverts are required in areas of fish habitat, application will be made to the appropriate regulatory agency, usually DECC and DFO. The culverts will be installed according to permit specifications and in accordance with the Environmental Guidelines for Culverts from the DECC. The following measures will also be implemented:
  - i) install culvert(s) in accordance with good engineering and environmental practices.
  - ii) unless otherwise indicated, work should take place in dry conditions, either by the use of cofferdams or by diverting the stream.
  - iii) installation of cylindrical culverts shall be counter sunk only where necessary to protect fish habitat such that the culvert bottom is one-third the diameter below the streambed in the case of culverts less than 750 mm outside the diameter; for culverts greater than 750 mm outside diameter, the culvert bottom shall be installed a minimum of 300 mm below the streambed.

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- iv) in multiple (gang) culvert installations, install one culvert at an elevation lower than the others.
- v) the natural low flow regime of the watercourse will not be altered.
- vi) a culvert will not be installed before site specific information such as localized stream gradient, fish habitat type and species present have been evaluated. Culverts are to be installed using the guidelines provided in Gosse et al. (1998).
- vii) riprap outlets and inlets to prevent erosion of fill slopes.
- viii) use culverts of sufficient length to extend a short distance beyond the toe of the fill material.
- ix) use backfilling material that is of a texture that shall support the culvert and limit seepage and subsequent washing out.
- x) align culverts such that the original direction of stream flow is not significantly altered.
- xi) remove fill and exploration related debris from the culvert area to a location above the peak flow level to prevent its entry into the stream.
- xii) fill material shall not be removed from streambeds or banks; except when installing a culvert when removal of material is necessary for the foundation.
- xiii) culverts should be marked to indicate their position under the snow.
- xiv) minimize and restrict the use of heavy equipment in and near watercourses; where possible, an excavator will be used from shore rather than a bulldozer in the watercourse. Where it is absolutely necessary to do so, instream work will be performed by rubber tired vehicles (Gosse et al. 1998) only and will only be done with prior notification of NFGC's Field Manager, in compliance with applicable regulatory agencies.
- xv) as required, cofferdams of non-erodible material will be used to separate work areas from the watercourse when excavating for culverts and footings, and
- xvi) cofferdams will be removed upon completion of exploration and the streambed returned as closely as possible to its original condition.

d) When fording watercourses, the DECC Environmental Guidelines and applicable permits will be adhered to, along with the following:

- i) areas of spawning habitat will be avoided.
- ii) crossings shall be restricted to a single location and crossings made at right angles to the watercourse.
- iii) equipment activity within the watercourse shall be minimized by limiting the number of crossings.
- iv) equipment will be mechanically sound to avoid leaks of oil, gasoline and hydraulic fluids.

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- v) no servicing or washing of heavy equipment will occur adjacent to watercourses; temporary fueling, servicing or washing of equipment in areas other than the main fuel storage site will not be allowed within 30 m of a watercourse.
- vi) stabilize the entire fording area using vegetation mats, corduroy roads or coarse material (125 mm diameter or greater), when the ford area is not natural bedrock, or is easily disturbed by fording. When the substrate of the ford area is not subject to easy disturbance by fording, or coarse material is not easily available within the lease boundaries, fording under existing substrate conditions may occur under the direction of the Field Manager.
- vii) fording activities will not decrease the depth of the watercourses to less than 20 cm. Where the existing depth is less than 20 cm, that depth will be maintained.
- viii) fording activities will be halted during seasonal, or precipitation related high flow periods, and
- ix) stabilize bank sections that contain loose or erodible materials. If banks must be sloped for stabilization, no material will be deposited in the watercourse and sloping will be accomplished by back-blading and the material removed will be deposited above the high water mark of the watercourse.

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## 4.9 Exploration Drilling on Land, Water Well Drilling and Pump Tests

### Potential Environmental Concerns

The potential environmental concerns related to exploration drilling, water well drilling and pump tests include surface disturbances, disposal of drilling fluids and cuttings, siltation, generation of dust, noise and impacts to terrestrial habitats, decreased air quality, adversely impacted aquatic ecosystems and disturbance of historic resources.

### Environmental Protection Procedures

- a) Proposed drilling sites in sensitive areas should be inspected prior to drill site preparation by the Site Manager.
- b) Vegetation will be cleared following the procedures detailed in Section 4.4.
- c) Waste oil will be removed from the drill site and properly disposed of, as per the WMP.
- d) Water applications will be used to control dust where necessary. The use of water for dust control or lubrication during drilling will be undertaken in such a manner that runoff will not enter watercourses.
- e) Water used per a Water Use Licence will remain at the drill site. Every effort will be made to prevent turbid water from entering watercourses.
- f) Drill cuttings will be removed from site in areas associated with the PPSWSA. All others will remain on site, but in the immediate location of drilling activities and outside required buffer zones. This is in accordance with NFGC's current exploration license.
- g) Drilling equipment will have muffled exhaust to minimize noise.
- h) Fuel will be stored, handled and transported according to Section 4.14.
- i) Garbage and solid waste will be removed from work sites and disposed of in an approved waste disposal area, and as described in the WMP.
- j) The nature of drilling activities (i.e., use of quicksnaps and couplings) may lead to oil drops and leaks. Rigs and worksites will be equipped with oil absorbent material and spill kits to be used in the event of a leak or spill and be kept available in case of a hydrocarbon spill.
- k) Drilling of water wells will be conducted in compliance with the *Water Resources Act* and *Well Drilling Regulations*.
- l) Completed exploration drill holes will retain casings and remain open for future probing. If a completed drill hole is producing water, it will be temporarily capped or indefinitely sealed with appropriate material to allow for necessary future downhole testing. When test work on the holes has been completed, the casing will be removed.

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## 4.10 Trenching

### Potential Environmental Concerns

Where excavation for trenching occurs, potential runoff of sediment-laden water could result in adverse effects on freshwater fish habitat and water quality.

### Environmental Protection Procedures

The following measures will be employed to minimize the potential adverse impacts of trenching:

- a) The topsoil, and excavated overburden and bedrock will be stored in separate stockpiles for later use during rehabilitation.
- b) Material unsuitable for future rehabilitation will be disposed of in a disposal area approved by the Site Manager or designate.
- c) Dewatering of trenches will make use of measures to minimize and control the release of sediment laden water through the use of various filtration measures including, but not limited to, erosion control devices, settling ponds, straw bales, geotextile or other devices. Water quality monitoring of run-off or discharges may be required by the PPD (DECC), to ensure no adverse effects on the receiving environment.

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#### 4.11 Pumps and Generators

##### Potential Environmental Concerns

A variety of water pumps, hoses and generators may be used at exploration sites and to support site trailers. Potential environmental concerns associated with their use include potential accidental spills or chronic leaks that could adversely impact waterbodies.

##### Environmental Protection Procedure

- a) To reduce fire hazards, fuel should not be stored immediately adjacent to generators, and the fuel storage area should be well ventilated. Fuel should not be stored within 100 m of waterbodies (Gosse et al. 1998).
- b) Fuel storage containers are to have spill trays beneath with a potential capacity of 110% of volume. They should also be in a covered and secured area.
- c) Drip pans are placed underneath pumps and generators located near waterbodies.
- d) Hoses and connections on equipment located near waterbodies should be inspected routinely for leaks and drips.
- e) Leaks will be reported immediately to the NFGC's Field Manager.
- f) In addition to spill kits located at fuel storage tanks, additional spill kits will be located at designated central storage location(s). Personnel involved with fueling, fuel transfer, and pumps and generators are trained in the use of spill kits.

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#### 4.12 Dewatering Work Areas and Site Drainage

##### Potential Environmental Concerns

The main concern associated with site dewatering and drainage relates to potential siltation of waterbodies and direct fish mortality and/or habitat destruction for freshwater aquatic species.

##### Environmental Protection Procedures

- a) Site water will be discharged to vegetated areas to limit potential adverse effects on waterbodies.
- b) Discharged water will follow natural surface drainage patterns.
- c) Monitoring of site run-off at exploration sites will be conducted as per provincial requirements, and in compliance with effluent quality standards.
- d) To reduce siltation to a waterbody, filtration or other suitable measures, (e.g., silt fences and/or dykes) will be used to limit silt and reduce the turbidity of water prior to discharging.
- e) If monitoring indicates regulated water quality standards are exceeded, NFGC will, in consultation with applicable regulatory agencies, develop additional mitigations. The use of a settling pond outside the main drilling area the main and PPWSAs will allow for natural attenuation of drill water.

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#### 4.13 Equipment Use and Maintenance

##### Potential Environmental Concerns

Various vehicles and heavy equipment may be used during exploration activities. Potential environmental concerns associated with operating and using vehicles and equipment include air emissions, accidental spills and hydrocarbon leaks that may contaminate on-site water bodies.

##### Environmental Protection Procedure

- a) Equipment maintenance and fueling activities will be performed at sites designated by the Field Manager and in compliance with applicable regulations.
- b) Drip pans will be placed under pumps, fuel containers, and generators.
- c) Hoses and connections on equipment will be inspected routinely for leaks and drips.
- d) Only minor repairs and maintenance (e.g., lubrication) of 'non-mobile' equipment will be performed on-site. Major repairs will be performed at a location outside of the exploration area, where possible.
- e) Fuel/oil leaks will be repaired and reported immediately to NFGC's Field Manager.
- f) Fuel and other hazardous materials will be handled according to procedures in Section 4.14.
- g) In addition to spill kits located at fuel storage tanks, additional spill kits will be located at designated central storage location(s). Personnel involved with fueling, fuel transfer, and pumps and generators will be trained in the use of spill kits.

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#### 4.14 Storage, Handling and Transfer of Fuel, and Other Hazardous Material

Typical hazardous substances that may be used on site include, but are not limited to:

- petroleum, oil and lubricants;
- chlorinated and non-chlorinated solvents (e.g., cleaner-degreasers);
- flammable gases (e.g., acetylene);
- waste petroleum products (e.g., used engine oil);
- corrosives (e.g., battery acid); and/or
- glycol (e.g., antifreeze).

#### Potential Environmental Concerns

The main concern relative to hazardous substances is a potential uncontrolled release to the environment through spillage, and subsequent adverse effects on the environment, (i.e., terrestrial and aquatic habitat and species, soil and groundwater quality), and human health and safety.

#### Environmental Protection Procedures

- a) The *WHMIS Regulations* under the *Occupational Health and Safety Act* will apply to the handling and storage of hazardous materials. Relevant and current Material Safety Data Sheets (MSDS) will be readily available for the site.
- b) Necessary precautions will be taken to prevent and reduce the spillage, misplacement or loss of fuels and other hazardous materials. In the event of a reportable spill on-land or a spill, regardless of size, in the freshwater environment, the **Environmental Emergencies 24-Hour Report Line** will be contacted as noted in the contact list in Section 7.0.

A spill is defined as reportable, depending on the class and quantity of dangerous goods involved, which varies between applicable Regulations:

- Reportable spill quantities for hazardous materials are listed in the *Transportation of Dangerous Goods Act*.
- A reportable hydrocarbon spill is defined as loss of gasoline or associated products in excess of 70 litres in the *Storage and Handling of Gasoline and Associated Products Regulations*.
- A spill, regardless of size, that may enter the freshwater environment, must be reported according to the *Fisheries Act*.

- c) A copy of the Contingency Plan (located in Section 5.1) for fuel and hazardous material spills will be readily available.

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- d) Fuel storage systems will be registered and comply with the *Storage and Handling of Gasoline and Associated Products Regulations*.
- e) Only workers who are qualified and trained in handling these materials as stated in the manufacturer's instructions and government laws and regulations will handle fuel and other hazardous materials.
- f) Operators will stay present during the entire refueling operation. At no time should it be left unattended.
- g) Fuel and other hazardous materials should be stored at least 100 m from surface waterbodies (Gosse et al. 1998).
- h) Handling and fueling procedures will comply with the *Storage and Handling of Gasoline and Associated Products* and additional requirements put forth by applicable regulators in order to limit potential contamination.
- i) Fuel storage areas and non-portable transfer lines will be clearly marked or barricaded so that they are not damaged by moving vehicles. The markers will be visible under all weather conditions. Barriers will be constructed in compliance with the *Storage and Handling of Gasoline and Associated Product Regulations*.
- j) Waste oils, lubricants and other used oil will be retained in a tank or closed container and disposed of in accordance with the *Used Oil Control Regulations*. Spill trays will be used, and substances will be stored in a secured area.
- k) Fire and spill response materials will be kept nearby.
- l) Soil contaminated by small leaks of oil or grease from equipment will be disposed of according to the *Environmental Protection Act*.
- m) Storage tank systems will be inspected on a regular basis by the operator as per the *Storage and Handling of Gasoline and Associated Products Regulations*. This involves, but is not limited to, gauging or dipping, reconciliation of records and the proper maintenance of reconciliation records for the applicable timeframe noted within permits and regulations.
- n) Contracted fuel suppliers will, before transporting or positioning fuel or oil, provide NFGC with a copy of their fuel and hazardous material spills contingency plan.
- o) Transportation of hazardous and dangerous materials will be conducted in accordance with applicable regulations. Transportation documents will be retained in a retrievable filing system and stored for the duration of the undertaking.
- p) Smoking will be prohibited within 10 m of a fuel storage area.
- q) Fueling or servicing of mobile equipment will be conducted in designated areas and should not occur within 100 m of a body of water (Gosse et al. 1998).

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- r) Drum storage areas will not be located within 100 m of a water body (Gosse et al. 1998). Drums containing hydrocarbon or other hazardous materials will be transported, stored, handled and disposed of such that spillage or leakage does not occur. NFGC must approve the location of drum storage areas.
- s) Small quantities of hazardous material (e.g., drums, cans and other containers under 20 L) will be stored in a secure location protected from weather and freezing, as well as vehicle traffic.
- t) Where hazardous materials are to be stored outdoors, a designated area will be established, graded and fitted with an impermeable membrane covered with local soil and surrounded by an earth berm.
- u) Decommissioning of temporary storage tank systems will be conducted according to the *Environmental Code of Practice for Aboveground Storage Tank Systems Containing Petroleum Products*.
- v) Hazardous waste will be moved to an appropriate hazardous waste storage area (refer to Section 4.18 for disposal). These areas are constructed in compliance with applicable legislation.

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#### 4.15 Propane Use

##### Potential Environmental Concerns

There are potential risks associated with propane storage and use. It is a flammable substance and poses potential threat to human and animals. In the liquid form, propane could potentially cause frostbite on skin contact. Propane containers could potentially explode if exposed to heat or fire.

##### Environmental Protection Procedures

- a) Propane storage tanks will be installed and used as per manufacturer's specifications.
- b) Tank maintenance schedules will be set and followed.
- c) Tanks will be free of corrosion and damages.
- d) Areas surrounding propane storage tanks will be well ventilated and free of possible ignition sources, and combustible materials.

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#### 4.16 Waste Disposal

##### Potential Environmental Concerns

Waste (e.g., domestic and industrial wastes, grey water, paper, cardboard and wood), if not properly controlled and disposed of, will be unsightly and could potentially cause human safety and health concerns. It could also attract wildlife leading to the potential for human-wildlife conflicts. NFGC has developed a Waste Management Plan (WMP) that identifies the various waste streams anticipated from exploration activities and provides appropriate waste management procedures to follow. A summary of the WMP is presented below.

##### Environmental Protection Procedures

- a) Solid waste will be handled according to the provincial *Environmental Protection Act*.
- b) Solid waste materials shall be considered, prior to disposal, for reuse, resale, or recycling.
- c) Solid waste produced by site personnel will be collected and disposed of at an approved facility, with permission obtained from that facility.
- d) Waste accumulated on site prior to disposal will be confined, so that it does not pose an environmental or health hazard.
- e) Work areas will be kept clear of waste and litter to reduce the potential for attracting wildlife and reducing potential interactions with wildlife.
- f) Food waste that may attract animals will be stored in covered, wildlife-proof containers.
- g) Burning of waste is not permitted without appropriate permits.
- h) Hazardous wastes generated will be handled according to the procedures for handling fuel and hazardous materials.

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#### 4.17 Sewage Disposal

##### Potential Environmental Concerns

The release of untreated sewage is a potential concern to human health, drinking water quality, and aquatic and terrestrial habitats. Sewage disposal is also addressed in NFGC's WMP.

##### Environmental Protection Procedures

- a) The sewage will be removed from portable toilets by a licensed contractor and disposed in compliance with the NL Department of Health guidelines, the *Lands Act, Waste Management Regulations, 2003* under the *Environmental Protection Act* and the *Environmental Control Water and Sewage Regulations, 2003* under the *Environmental Protection Act*.
- b) Portable toilets or pit privies will be located a distance of at least 25 m from exploration sites in a direction away from bodies of water. Pit privies will be backfilled upon abandonment of the exploration site.

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#### 4.18 Hazardous Waste Disposal

##### Potential Environmental Concerns

The primary concern with disposing of hazardous substances is the potential for an uncontrolled release to the environment through leakage or accidental spillage, and subsequent adverse effects on terrestrial and aquatic habitat and species, soil, groundwater quality, and human health and safety. The management of hazardous waste is addressed in NFGC's WMP

##### Environmental Protection Procedures

- a) Hazardous waste will be handled according to the provincial *Environmental Protection Act*. Waste classified as "hazardous" or "special" that cannot be disposed of in regular landfill sites will be sent for disposal to a licensed hazardous waste management company.
- b) Necessary precautions will be taken to prevent and reduce the spillage, misplacement or loss of fuels and other hazardous materials. In the event of a spill on-land or in the freshwater environment, refer to the Contingency Plan (Section 5.1).
- c) A copy of NFGC's Contingency Plan will be present at hazardous material storage sites and fuel transfer locations.
- d) Hazardous waste materials will only be handled by workers who are qualified and trained in handling these materials as stipulated in government laws and regulations.
- e) Waste accumulated on site prior to disposal will be confined, so that it does not pose an environmental or health hazard.
- f) Waste material will not be disposed of on-site or in a body of water.
- g) Burning of waste is not permitted.
- h) Where hazardous waste materials are to be stored outdoors, a designated area will be established, graded and fitted with an impermeable membrane covered with local soil and surrounded by an earth berm.
- i) Waste oils, lubricants and other used oil will be retained in a tank or closed container and disposed of in accordance with the *Used Oil Control Regulations*.
- j) Soil contaminated by small leaks of oil or grease from equipment will be disposed of according to the *Environmental Protection Act*.
- k) Hazardous wastes generated, by alternative treatments will be handled according to the procedures for handling fuel and hazardous materials (Section 4.14).

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#### 4.19 Vehicle Traffic

##### Potential Environmental Concerns

Vehicular traffic can result in fugitive dust, emissions and noise. NFGC is committed to the proper operation and maintenance of its vehicles to reduce environmental impacts.

##### Environmental Protection Procedures

- a) Vehicles and equipment, including ATVs, will be restricted to designated routes within and between work, laydown, maintenance and storage areas.
- b) Vehicles and equipment will be properly maintained to meet emission standards.
- c) Travel in areas outside designated work areas will not be permitted.
- d) Vehicles and equipment will yield to wildlife.
- e) Vehicles and equipment will yield to people, if present, and reduced speeds will be maintained on roadways.
- f) Chasing and/or harassing wildlife with vehicles and equipment will not be permitted.
- g) Maintaining and refueling vehicles will be restricted to designated areas (See Section 4.14).
- h) Heavy equipment (e.g., dump trucks and front-end loaders) will only be used in work areas.
- i) Access roads will be monitored for signs of erosion and appropriate action will be taken to repair roads, when necessary.
- j) As required, the contractor will implement dust suppression measures such as watering the roads.

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#### 4.20 Dust Control

##### Potential Environmental Concerns

The environmental concerns associated with dust include potential human health effects and potential effects on aquatic ecosystems and vegetation.

##### Environmental Protection Procedures

- a) Dust from exploration activities will be controlled using water. In the event of excessive dust, water will be applied to travel and work surfaces.
- b) Waste oil will not be used for dust control, but other agents such as calcium chloride may be used with the approval of the appropriate regulatory agencies.

#### 4.21 Noise Control

##### Potential Environmental Concerns

A variety of noises associated with exploration activity can adversely impact the distribution and abundance of wildlife resources in the area. Noises associated with heavy equipment use are temporary in nature and noises associated with drilling are more long term but localized.

##### Environmental Protection Procedures

Mitigation measures will be implemented where possible to limit potential impacts from exploration noise.

- a) Adherence to permits, approvals and/or authorizations.
- b) Vehicles and generators will have exhaust systems regularly inspected and mufflers will be operating properly.

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## 5.0 CONTINGENCY PLANS

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The following contingency plans to address accidents and unplanned events have been developed and will be modified as required throughout exploration activities.

- Fuel and Hazardous Material Spills;
- Wildlife Encounters;
- Forest Fires, and
- Discovery of Historic Resources.

### 5.1 Fuel and Hazardous Material Spills

#### Potential Environmental Concerns

Fuel and hazardous materials can potentially be damaging to vegetation, soil, surface water, groundwater, wildlife, aquatic organisms, historic resources, and human health and safety.

#### Environmental Protection and Response Procedures

In case of a fuel or hazardous material spill, the following procedures will apply.

- a) The individual who discovers the leak or spill will make a reasonable attempt to immediately stop the leakage and contain the flow, if safe to do so. Spill kits are located at fuel storage tanks and at designated central storage location(s).
- b) Spill location, type of fuel or hazardous material, volume and terrain condition at the spill site will be determined and reported immediately to the Field Manager, who will report it immediately to the applicable regulatory agency.
- c) In the event of a reportable spill on-land or a spill regardless of size that may enter a waterbody frequented by fish must be reported immediately to the Environmental Emergencies 24 Hour Report Line **709-772-2083 or 800-563-9089**. (Refer to Section 4.14 for the definition of reportable spills on-land versus in freshwater environments.) The spill occurrence shall be documented on the Spill Report Form in Appendix C.

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Required information may include any or all of the following:

- i) name of reporter and phone number;
- ii) time of spill or leak;
- iii) time of detection of spill or leak;
- iv) type of product spilled or leaked;
- v) amount of product spilled or leaked;
- vi) location of spill or leak;
- vii) source of spill or leak;
- viii) type of accident - collision, rupture, overflow, other;
- ix) owner of product and phone number;
- x) if the spill or leak is still occurring;
- xi) if the spill or leaked product is contained, and if not, where it is flowing;
- xii) wind velocity and direction;
- xiii) temperature;
- xiv) proximity to waterbodies, water intakes, and facilities, and
- xv) snow cover and depth, terrain, and soil conditions.

d) The Field Manager will act as the "On-Scene-Commander" for the purposes of cleaning up a fuel or hazardous materials spill. The Field Manager will be familiar with spill clean-up procedures and mobilization procedures of the clean-up equipment and will have full authority to take necessary and appropriate action without unnecessary delay.

e) The overall responsibility of coordinating clean-up and maintaining the contingency plan current and up-to-date will be the Senior Project Manager.

f) Personnel will be trained in the procedures to follow in case of a fuel or hazardous material spill, and spill communication procedures. NFGC will update the personnel responsibilities list specific to spill response on an ongoing basis.

A complete list of spill response equipment will be available and distributed at exploration sites before the start of exploration activities.

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- g) In reaching decisions on containment and clean-up procedures, the following criteria will be applied:
  - i) limit danger to workers and the public;
  - ii) protect public water supplies;
  - iii) limit adverse impacts to waterbodies;
  - iv) limit area affected by spill, and
  - v) limit the degree of disturbance to the area and waterbodies during clean-up.
- h) The Field Manager or Senior Project Manager will act in consultation with the authorities to:
  - i) assess site conditions and environmental impacts of various cleanup procedures;
  - ii) assess potential for fuel recovery versus burning;
  - iii) deploy on-site staff to mobilize pumps and empty 215-L drums or other appropriate storage containers to the spill site;
  - iv) deploy on-site staff to build containment dykes and commence pumping contaminant into drums;
  - v) apply absorbent as necessary;
  - vi) dispose of contaminated debris, cleaning materials and absorbent by burning, if appropriate, or by placing it in an approved land-fill site, and
  - vii) take necessary precautions to avoid the incident in the future.
- i) The Field Manager will be responsible for the preparation of a written report which will be sent (as soon as possible and no later than 30 days after the spill) to NFGC's Senior Project Manager and, from there, to the applicable regulatory agencies.

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## 5.2 Wildlife Encounters

### Potential Environmental Concerns

Wildlife encounters pose a potential risk for stress or injury to both the wildlife and site personnel.

### Environmental Protection and Response Procedures

Personnel and contractors are responsible that the following procedures are followed:

- a) Hunting, trapping or fishing by exploration personnel will not be permitted on the Properties.
- b) Site and working areas will be kept clean of food scraps and garbage.
- c) Waste will be collected for disposal in appropriate containers and routinely transferred to an approved location or facility.
- c) No personnel will chase, catch, divert, follow or otherwise harass wildlife by vehicle or on foot at the exploration sites.
- d) Equipment and vehicles will yield the right-of-way to wildlife.
- e) Personnel should be aware of the potential for encounters with wildlife. Wildlife sightings will be recorded on the wildlife sighting forms.
- f) The Field Manager will be responsible for actions in response to nuisance animals (e.g., bears) in the exploration areas and will advise the Senior Project Manager for further action.
- g) Under provincial wildlife regulations, the displacement and release of an animal is the sole jurisdiction of the DECC, and is to be undertaken only under appropriate supervision.
- h) If the nest of a raptor, or other birds are encountered during exploration activities, work in the area is to be halted until the Field Manager and/or Senior Project Manager is contacted and has had the opportunity to contact the Wildlife Division and appropriate mitigation is applied.

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## 5.3 Forest Fires

### Potential Environmental Concerns

Certain activities associated with exploration work could potentially result in a fire, which could spread to the surrounding area. Such events could potentially be damaging to the biophysical environment (i.e., vegetation, wildlife, air quality, water quality), and human health and safety, and NFGC assets.

### Environmental Protection and Response Procedures

NFGC and their contractors will take precautions to limit the potential for fire when working at the exploration sites. These precautions include, but are not limited to:

- a) Disposal of flammable waste on a regular basis. There will be no open fires during fire season.
- b) NFGC or their contractor will provide sufficient firefighting equipment to suit its labour force and fire hazards. Such equipment will be in good working order, comply with, and be maintained to the manufacturer's standards.
- c) NFGC or their contractor will ensure personnel are trained in the use of firefighting equipment.
- d) In the event of a forest fire, NFGC or the contractor will take immediate steps to contain or extinguish the fire, if safe to do so.
- e) NFGC's Field Manager will appoint a supervisory staff member as "On-Scene-Commander" for fighting forest fires, if safe to do so.
- f) Fires should be reported immediately to:
  - i. the Field Manager and Senior Project Manager; and
  - ii. Forestry Branch, 24 hr Forest Fire Emergency Line at **(800)-898-4528**.
- i) The following information will be provided:
  - i. name of the reporter and phone number;
  - ii. time of detection of the fire;
  - iii. size of the fire; and
  - iv. location of the fire.

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## 5.4 Discovery of Historic Resources

### Potential Environmental Concerns

Historic resource material that is disturbed, destroyed or improperly removed from a site represents a potential cultural loss of information and history that could otherwise be handled and interpreted in an efficient and appropriate manner.

### Environmental Protection and Response Procedures

- a) If suspected archaeological material is encountered, stop work in the immediate area of the discovery until authorized personnel from NFGC, having consulted with the PAO, permit resumption of the work.
- b) Mark the site's visible boundaries. Personnel will not move or remove artifacts or associated material unless the integrity of the material is threatened.
- c) The Field Manager will report the find with the following information to the PAO and comply with the instruction provided:
  - i) nature of the find;
  - ii) precise description, map location and time of the find;
  - iii) nature of the activity resulting in the find;
  - iv) identity of the worker(s) making the find;
  - v) present location of the material, if moved, and protective measures initiated for the material and the site, and
  - vi) extenuating circumstances.

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## 6.0 EPP CONTROL REVISIONS

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This EPP will be revised as necessary to reflect site-specific environmental protection requirements and allow updates as work progresses or changes. EPP holders may initiate revisions by forwarding proposed revisions to the Field Manager and/or the Senior Project Manager. The following information will be provided on the Revision Request Form (Appendix D) for revision requests:

- section to be revised;
- nature of the revision;
- rationale for the revision (e.g., environment and/or worker safety), and
- who submitted the revision request.

Approval for revisions will be required from NFGC. When the Senior Project Manager approves a revision request, details of the revision will be distributed to EPP holders and will be documented in the Revision History Log (Appendix E). Each revision will be accompanied by:

- revision instructions;
- list of sections being superseded; and
- an updated Table of Contents indicating the status of each section in the EPP.

When EPP Holders receive a revision, they will, in a timely manner:

- read the text of the revision;
- check the control sheet to confirm that the listed pages have been received;
- remove and destroy the superseded pages from their copy of the EPP;
- insert the revised pages in the proper place in their copy of the EPP;
- page check the EPP, using the updated table of contents to confirm the EPP is complete and current;
- enter the revision number and date entered on the Revision History Log;
- incorporate the revision into the area of responsibility, as appropriate, and
- confirm that their personnel are familiar with the revisions.

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## 7.0 CONTACT LIST

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**New Found Gold Corp. Main Office**

(709) 381-9353

**New Found Gold Corp.**

Greg Matheson, P.Geo. – Chief Operating Officer  
(709) 570-1233

**New Found Gold Corp.**

Mike Regular, P.Geo.- Senior Project Manager  
(709) 486-7705

**New Found Gold Corp.**

Kevin Keats – Field Manager  
(709) 424-1077

**New Found Gold Corp.**

Stephen Keats – Occupational Health and Safety Manager  
(709) 424-6535

**Canadian Coast Guard Environmental Emergencies, 24-Hour Report Line**

St. John's (709) 772-2083  
Other Areas 1-800-563-9089

**Service NL, Occupational Health and Safety Division**

Grand Falls-Windsor Office, Tel: (709) 292-4400  
Serious Workplace Accidents (24 hrs): (709) 729-4444

**Department of Environment and Climate Change**

**Water Resources Management Division**  
Director, Tel. (709) 729-2563

**Department of Environment and Climate Change**

**Pollution Prevention Division**  
Director, Tel. (709) 729-5782

**Department of Department of Fisheries, Forestry and Agriculture**

**Wildlife Division**  
Wildlife Biologist, Tel: (709) 637-2353

**Department of Fisheries, Forestry and Agriculture**

**Crown Lands Administration Division**  
Western and Labrador Regional Lands Office, Tel: (709) 637-2390

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**Department of Fisheries, Forestry and Agriculture**  
24 hr Forest Fire Emergency Line  
Tel. (800)-898-4528

**Department of Industry, Energy and Technology,**  
Director, **Mineral Lands**  
Tel. (709) 729-6425

**Department of Tourism, Culture, Arts and Recreation**  
Provincial Archaeology Office, Tel. (709) 729-2462

**Environment and Climate Change Canada**  
Environmental Emergencies Coordinator  
Tel. (709) 772-7285

**Environment and Climate Change Canada – Canadian Wildlife Service**  
Manager, Regulatory Affairs  
Tel: (709) 772-7456 or (709) 690-3382

**Department of Fisheries and Oceans**  
Area Habitat Biologist, Central, Tel: (709) 292-5197

**Town of Gander**  
Tel: (709) 651-2930 Fax: (709) 256-5809

**Town of Appleton**  
Tel: (709) 679-2289 Fax : (709) 679-5552

**Town of Glenwood**  
[Tel: \(709\) 679-2159](tel:(709)679-2159) Fax: [\(709\) 679-5470](tel:(709)679-5470)

**RCMP**  
1-800-709-7267 (non-emergency)

**Petroleum & Environmental Services Inc.**  
10 Simms Rd, Glenwood, NL A0G 2K0  
Tel: 1-877-449-2335 (24hrs) Fax: 1-709-679-2205  
Email: [info@pesnl.ca](mailto:info@pesnl.ca)

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## 8.0 REFERENCE MATERIAL

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Canadian Council of Ministers of the Environment. 1994 and updates. Environmental Code of Practice for Aboveground Storage Tank Systems Containing Petroleum Products.

Department of Environment, Climate Change and Municipalities, Water Resources Management Division. Environmental Guidelines for Stream Crossings by All-Terrain Vehicles.

Department of Industry, Energy and Technology. Mines Branch. Estimated 1995. Environmental Guidelines for Construction and Mineral Exploration Companies.

DFRA (Department of Forest Resources and Agrifoods). 1998. Environmental Protection Guidelines for Ecologically Based Forest Resource Management (Stand Level Operations).

Gosse, M.M., A.S. Power, D.E. Hyslop, and S.L. Pierce. 1998. Guidelines for Protection of Freshwater Fish Habitat in Newfoundland and Labrador. Fisheries and Oceans, St. John's, NL.

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## 9.0 SIGNATURE PAGE

### **New Found Gold Corporation**

The undersigned certify that they have reviewed, and understand their role and responsibility regarding:

#### **QUEENSWAY GOLD PROJECT**

#### **EXPLORATION ACTIVITIES**

#### **ENVIRONMENTAL PROTECTION PLAN**

As part of their Exploration Activities Orientation.

\_\_\_\_\_  
representing -

Name (Printed) \_\_\_\_\_ Company \_\_\_\_\_

\_\_\_\_\_  
Signature of above Date \_\_\_\_\_

\_\_\_\_\_  
Name of Manager or Supervisor \_\_\_\_\_

\_\_\_\_\_  
Manager or Supervisor's Signature Date \_\_\_\_\_



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**APPENDIX A  
LIST OF ABBREVIATIONS AND ACRONYMS**

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## LIST OF ABBREVIATIONS AND ACRONYMS

ATV	–	All-terrain Vehicle
DFO	–	Department of Fisheries and Oceans
NLDECC	–	Newfoundland and Labrador Department of Environment, Climate Change
NLDIET	–	Newfoundland and Labrador Department of Industry, Energy and Technology
NLDFFA		Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture
NLDTCAR	–	Newfoundland and Labrador Department of Tourism, Culture, Arts and Recreation
EPP		Environmental Protection Plan
MSDS	–	Material Safety Data Sheet
PES		Petroleum and Environmental Services Inc.
PPD	-	Pollution Prevention Division
WHMIS		Workplace Hazardous Materials Information System
WRMD		Water Resources Management Division



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**APPENDIX B  
CONTROLLED COPY DISTRIBUTION LIST**



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**APPENDIX C  
SPILL REPORT FORM**

 <b>NEWFOUND GOLD CORP</b>	<b>NEW FOUND GOLD CORP. ENVIRONMENTAL PROTECTION PLAN Mineral Exploration Queensway Gold Project</b>	<b>Version: 1.0</b>  <b>Date: April 2021</b>
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### **NFGC Fuel and Hazardous Materials Spill Report Form**

1. Name of reporter and phone number: \_\_\_\_\_
2. Time of spill or leak: \_\_\_\_\_
3. Time of detection of spill or leak: \_\_\_\_\_
4. Type of product spilled or leaked: \_\_\_\_\_
5. Amount of product spilled or leaked: \_\_\_\_\_
6. Location of spill or leak: \_\_\_\_\_
7. Source of spill or leak: \_\_\_\_\_
8. Type of accident - collision, rupture, overflow, other: \_\_\_\_\_
9. Owner of product and phone number:  
\_\_\_\_\_
  
10. Is the spill or leak still occurring: YES   NO
11. Is the spill or leaked product contained: YES   NO  
If NO, where it is flowing and what actions are being taken for containment:  
\_\_\_\_\_  
\_\_\_\_\_
  
12. Wind velocity and direction: \_\_\_\_\_
13. Temperature: \_\_\_\_\_
14. Proximity to waterbodies, water intakes, and facilities: \_\_\_\_\_
  
15. Snow cover and depth, terrain, and soil conditions: \_\_\_\_\_
  

In the event of a reportable spill on-land or any spill regardless of size that may enter a waterbody frequented by fish must be reported immediately to:

**Environmental Emergencies 24 Hour Report Line 709-772-2083 or 800-563-9089.**



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**APPENDIX D  
REVISION REQUEST FORM**



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**Date: April 2021**

**SECTION TO BE REVISED:**

**NATURE OF REVISION:**

**RATIONALE FOR REVISION:**

(i.e., environment/worker safety, etc.)

**SUBMITTED BY:**

Please submit request to the New Found Gold Field Manager.



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**APPENDIX E  
REVISION HISTORY LOG**



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Version: 1.0

**Date:** April 2021

## REVISION HISTORY LOG



# **ENVIRONMENTAL SPILL RESPONSE PLAN**

## **SECTION 1.0 - PURPOSE AND SCOPE**

### **1.1 Purpose**

The purpose of *New Found Gold Corp (NFGC) Spill Response Plan* (the plan) is to provide a safe, timely, effective, and coordinated response by the Environmental Department of NFGC in concert with other responding locals to a significant oil spill affecting lands, wetlands, lakes, and rivers near the field operation.

### **1.2 Scope**

The *New Found Gold Corp (NFGC) Spill Response Plan* is a company-level plan that:

- Outlines the organization, procedures, and duties of the company in response to a major inland oil spill at New Found Gold Corp.
- Identifies the role of the Environmental Site Supervisor as the “key” (lead) company representative for responding to an inland oil spill in cooperation with other responding jurisdictions, management and/or industries (Petroleum Environmental Services).
- Provides the missions and duties for an Incident Management Team based on the New Found Gold Corp.

## **SECTION 2.0 – INTRODUCTION, DEFINITIONS**

### **2.1 Introduction**

The *New Found Gold Corp (NFGC) Spill Response Plan* has been developed to mitigate the potential negative environmental effects of a spill or hazardous material arising from field operations by New Found Gold Corp (NFGC). The plan outlines the roles and responsibilities of the person involved, necessary equipment, tools, and training along with contact details for outside agencies required during a spill.

Emphasis is placed on the prevention of spills however contingency planning is necessary in the event of highly unusual circumstances.

### **2.2 Definitions**

**2.2.1 A spill** is an accidental or unwanted loss of containment of materials to the environment or workplace that could harm or cause discomfort to personnel, affect the health of the environment, or threaten the physical asset of the company.

**2.2.2 Hazardous materials** that may or may not be present at a field project site include:

- a. Petroleum products: oils, fuel oil, gasoline, greases
- b. Contaminated water: drill return water, silty water resulting from precipitation.
- c. Coolants: glycols other
- d. Human waste

**2.2.3 A spill to land** shall mean any spill that spills onto soil, vegetation or other hard surface or spills into standing water (puddles etc.)

**2.2.4 A spill to water** shall mean any spills into water that are connected to local drainage.

## **SECTION 3.0 – ROLES & RESPONSIBILITIES SPILL REPORTING**

This section outlines the roles and responsibilities of the parties involved in the ongoing exploration activities.

### **3.1 Environmental Department**

NFGC's Environmental Department is responsible for reporting spills that exceed the spill reporting guidelines to the appropriate authorities and Petroleum Environmental Services. Triggers for the reporting of a spill to the Department of Environment and Climate Change (DECC) and Environment and Climate Change Canada (ECCC):

- Petroleum products spill to land greater than 70 litres or an unknown quantity.
- Petroleum products spill in water of any quantity.
- Spill of glycol or other antifreeze of any quantity.
- Spill of silt, sediment-laden water into a waterway.

### **3.2 Incident Management Team**

The Environmental Department maintains NFGC's Incident Management Team. They are not included in this plan, as membership changes frequently. Procedures for initial notification of an incident are in accordance with the policies and procedures of the program.

#### **3.2.1 Callout of NFGC's Incident Management Team**

Call-out will be undertaken in accordance with instructions provided by the Environmental Department. Team member contacts are maintained separately from this plan.

### **3.3 Site Personnel, Contractors, and Agents**

Site personnel, contractors, and agents involved in exploration activities on the NFGC's properties will:

- immediately report spills and any other concerns to the Environmental Department.
- review and become familiar with procedures outlined in the spill response plan.
- follow and implement commitments noted in the spill response plan, including regulatory conditions noted in approvals, authorizations and permits.

## **SECTION 4.0 – DOCUMENTING SPILLS**

All spills shall be documented in a spill report on sitedocs and will include:

- the product.
- volume.
- location.
- persons involved.
- possible causes.
- recommended preventative measures.
- cleanup measures taken after any spill incident.
- post-cleanup inspection.

## **SECTION 5.0 – PROTECTIVE/ PREVENTATIVE MEASURES**

### **5.1 Secondary Containments**

All locations with containers carrying fuel or other petroleum-based products will always be contained with a secondary containment structure which shall be of sufficient volume to contain 110% of the volume of liquid held in the primary container.

Drilling sites are to be prepared in such a way that berms and sumps placed on the downslope side of the drilling location are sufficient to contain the drill return waters and have sufficient retention time to allow for the settling of drill cuttings before the water

absorbs into the natural environment. In no case should drilling discharge water be allowed to travel more than 30 metres from a drill site.

All drill cuttings are contained in sumps and the drill discharge water is recycled until drilling is completed at the site. Sumps are made to settle for three to four weeks and discharge to the environment when the total solid suspension reads less than 30 ppm. The area is then reclaimed and seeded with hydroseeding and haybales.

Other locations where sedimentation into water bodies seems probable, erosion control measures such as silt fencing, and straw bales shall be used. The area will be reclaimed and seeded with hydroseeding and haybales. This could include stream crossings or other locations close to water bodies.

## **SECTION 6.0 – SPILL CLEAN-UP MATERIALS AND PROCEDURES**

### **6.1 Spill Cleanup Materials**

Locations, vehicles, and equipment that contains a hazardous product must have spill-cleanup materials readily available. This should include absorbent pads, pillows, socks, and booms as required. The size of the spill kit should be proportional to the volume of liquid being stored.

After a spill has occurred and cleanup is completed the used spill cleanup materials shall be placed into an approved holding bin at the project site and promptly removed from the site to an approved disposal location.

A complete oil spill clean-up emergency kit must always be on site when gasoline or fuel-powered equipment is being used or refueled. The kit must contain the following:

- Fire pump and 100 metres of  
hose
- Two hand-operated fuel pumps
- Six recovery containers such as  
empty 205 litre drums
- Four shovels

- Two pickaxes
- Ten metres of containment boom
- One hundred litres of loose absorbent material

#### **6.1.1 Drip Prevention**

Equipment such as drill pumps, portable pumps, and engine housing shall include a drip pan lined with absorbent oil pads and promptly removed before overflow can occur.

#### **6.1.2 Diversion Tools**

Diversion tools should be made readily available, including shovels, when available heavy equipment should also be utilized.

#### **6.1.3 Water-based containments.**

Areas such as drill pump or fire pump locations where petroleum products are to be in proximity to waterbodies require the installation of floating oil booms as a preventative measure.

### **6.2 Buffer Zones**

Drilling or excavating shall not occur within 30m of all natural water bodies, except for pumping locations no other activity is to occur within 30m of a natural water body. This buffer is expanded to 300m for work specifically occurring near Gander Lake and 100m from any tributaries running directly into Gander Lake.

### **6.3 Storage of hazardous materials**

Hazardous materials should never be stored within 30 metres of a water body or 300 metres of Gander Lake.

### **6.4 Erosion control measures**

Erosion control materials primarily as silt fencing will be made available on site.

### **6.5 Transfer/transport of hazardous materials**

Hazardous materials are always to be handled with care; the transfer of petroleum products should always occur at site-specific transfer locations and never be left

unattended during transfers. Transport of petroleum products shall be done with either CSA-approved slip tanks with volumes less than 500 litres or jerry cans with volumes less than 25 litres.

## **6.6 Records**

All areas of new disturbance, drill trails and drill pads will undergo pre and post-drilling photography via drone or ground images for record purposes. Drill pads pre- and post-inspections will be retained for the duration of the project. Periodically the company shall use satellite imagery to monitor the scale of its development and reclamation efforts.

## **SECTION 7.0 – SPILL CLEAN-UP TRAINING**

- All personnel on-site, whether contractors or employees and dealing with hazardous materials shall be trained in the basic use of spill response equipment and clean-up procedures.
- All personnel shall be required to review the site-specific environmental spill response plan.
- MSDS sheets for all hazardous materials present at the project site should be readily available.
- Personnel involved in spill cleanup should always wear protective clothing/equipment as required in the product's MSDS sheet.

## **SECTION 8.0 – SPILL CLEAN-UP PROCEDURES**

### **8.1 General Procedure**

#### **8.1.1 Discover spill and complete initial assessment.**

- Prior to initiating a response plan, identify immediate hazards and use appropriate PPE.
- Halt activities that are causing the spill. If safe to do so, STOP THE PRODUCT FLOW! I.e., close valves, elevate leaking hoses, shut off pumps, etc.
- Prior to taking further action, complete an incident assessment - identify the product, determine the volume spilled, environmental impact and safety precautions to be taken.

#### **8.1.2 Notify**

- Report spill in accordance with company and local legislative requirements.
- If the spill is beyond the crew's level of training and experience, seek assistance from a spill response specialist and Petroleum Environmental Services.

### **8.1.3 Containment and Recovery**

- Employ hand tools, heavy equipment, and spill response equipment available at hand to minimize the spread and impact of the spill until additional resources and expertise arrive if required.

## **8.1 Spills on Land**

- Determine the area/extent of the spill. Contain spills away from any water course.
- Mark the perimeter of the spill. Dig recovery ditches around the perimeter and sump(s) within the spill area. Monitor ditches and sump(s) to ensure the collection system is effective.
- Recover the product from the containment area, treat and/or dispose of it in an approved manner.

## **8.2 Spills in Water**

- Corral the spill using whatever surface water containment system possible.
- Divert and corral the spilled product to the containment system using absorbent booms or other methods.
- Continue to sweep and corral the spilled product to one corner for recovery.

## **8.3 Document, Follow-up, Disposal and Site Remediation**

- Ensure spills have been documented in a spill report and reported to agencies and/or designated persons.
- Complete clean-up and required mitigation actions. If required contact a spill response specialist for assistance.
- Complete and submit an Incident Report within 24 hrs.

## **8.4 Spill Cleanup Roles and Responsibilities**

### **8.5.1 First on Scene**

- Evaluate, and identify the source of the spill and spilled product.

- Implementation of security measures, to ensure unauthorized persons are not entering the spill location.
- Can you stop the spill safely? If so close the valve and turn off pumps or other gravity-flow hoses.
- Prevent access of spilled material to water through diversion channels, and sumps.
- Contact the Environmental site supervisor and include the location and status report as soon as possible.
- Assist spill response team members in conducting spill response cleanup.

### **8.5.2 Spill Response/ Incident Management Team**

- Stop or reduce the discharge, if safe to do so.
- Deploy spill response equipment.
- If possible, prevent access of spilled material to water.
- Continue cleanup as directed by the site project manager or until relieved.
- Restore damaged environment and property as directed.
- Collect contaminated and hazardous materials and store them in separate sealed containers.
- Prepare the materials for transport to an authorized disposal site.
- In case of large spills, collect soil/water samples for characterization by an accredited laboratory, as directed.
- Complete a spill report and assist in remediation efforts as required.

### **8.5.3 Environmental Department**

- Assess risk for potential spills and identify preventative and control measures required.
- Ensure Emergency Response Plan is readily available on site.
- Ensure Spill Response Plan is readily available on site.
- Ensure all workers are familiar with potential spill activities/sites, spill kit requirements and locations.
- Ensure workers are trained in WHMIS and spill response.
- Have appropriate Material Safety Data Sheets (MSDS) readily available for all controlled products on site.

- Conduct periodic spill preparedness and response drills.
- Complete spill kit inspections and maintain spill kits as necessary.
- Respond to all spills in accordance with the Environmental Spill Response Plan. The person responsible for a spill of hazardous material is responsible for taking appropriate actions to minimize environmental impact.
- Report all reportable spills and complete a spill report including a follow-up remediation report.

## **SECTION 9.0 – RESPONSIBILITIES**

It is the responsibility of all personnel involved in field operations to ensure that spills do not occur and that the proper protective measures are in place. As project owner New Found Gold Corp has the ultimate responsibility for the protection of the environment at its project sites from harm that may arise from operations. Owing to the fact most work conducted at the site will be done so by contractors NFGC is committed to ensuring those contractors are best in class and are directly liable for spills resulting from their negligence/ non-adherence to the Environmental Spill Response Plan. NFGC and contractors must carry insurance coverage for spills and environmental cleanup in amounts no less than \$1.0 Million.

## **SECTION 10.0 – SITE SPECIFIC SPILL RESPONSE PLAN**

### **10.1 Site Specific Spill Response Plan - Drilling East of Appleton, NL (sites A, B, C, E) and South of the TCH (site D)**

- Drilling of 2500 diamond drill holes or reverse circulation drill holes including 300 drill holes inside of the Gander Lake PPWSA
- All bulk fuel and waste storage will be outside of GLPPWS.
- Anticipated fuel use will be approximately 360L/day of colored diesel per diamond drill up to 10 drill.
- Fuel storage within the Protected Public Water Supply Area shall be limited to the amount of fuel required to drill each borehole up to a maximum of no more than two (2) new 205 litre drums, or one (1) CSA or ULC-approved slip tank having a capacity of 500 litres. All fuel drums or slip tanks must be in good condition. Refueling sites shall be located at least 30 metres from any water body or wetland. Fuel drums or slip tanks shall have metal trays, absorbent pads, or impervious liners under them to catch and contain more than 110 % of the aggregate volume of fuel.

- Anticipated water taking will be 200m<sup>3</sup>/day and shall be verified periodically by bucket testing.
- Sediment/Erosion control material installation does not appear necessary upon preliminary inspection however materials will be on site to be deployed as necessitated. Drilling pads are to be designed to allow for the containment of hazardous substances.
- A 30 metre buffer for drill pad locations will be maintained surrounding all natural water bodies and expanded to 300 metres buffer for working around Gander Lake including 100m around all tributaries running into Gander Lake.

## 10.2 Site Specific Water Quality Management - Drilling East of Appleton, NL (sites A, B, C, E) and South of the TCH (site D)

- All water, runoff or effluent from the mineral exploration activity that is pumped or flows by gravity, shall have silt, sludge, sediment, cuttings, and visible turbidity removed by means of sediment boxes, settling tanks, settling ponds, sumps dug into the ground, filtration or other suitable treatment, to less than or equal to 30 milligrams per litre of Total Suspended Solids (TSS), before being discharged to the environment. More specifically, at the last point of control, the final discharge of all water, runoff or effluent must conform to the limits specified in Schedule A of the Environmental Control Water and Sewer Regulations, 2003, <https://www.assembly.nl.ca/Legislation/sr/Regulations/rc030065.htm>. It is the responsibility of New Found Gold Corp to demonstrate that the final discharge meets the requirement of these Regulations. A minimum of one grab sample must be collected from the final discharge point for each borehole, analyzed at an accredited Laboratory, and the results provided to the Water Resources Management Division, Department of Municipal Affairs and Environment within seven (7) days of the receipt of analytical results. Sample is to be analyzed for:

- Total Dissolved Solids
- Total Suspended Solids
- Arsenic
- Barium
- Boron
- Cadmium

- Chlorine
- Chromium
- Copper
- Cyanide
- Iron
- Lead
- Mercury
- Nickel
- Nitrates
- Nitrogen (ammoniacal)
- Phosphorous
- Selenium
- Sulfides
- Silver
- Zinc”

➤ All drill cuttings are contained in sumps and the drill discharge water is recycled until drilling is completed at the site. Sumps are made to settle for three to four weeks and discharge to the environment when the total solid suspension reads 30 ppm. The area is then reclaimed and seeded with hydroseeding and haybales.

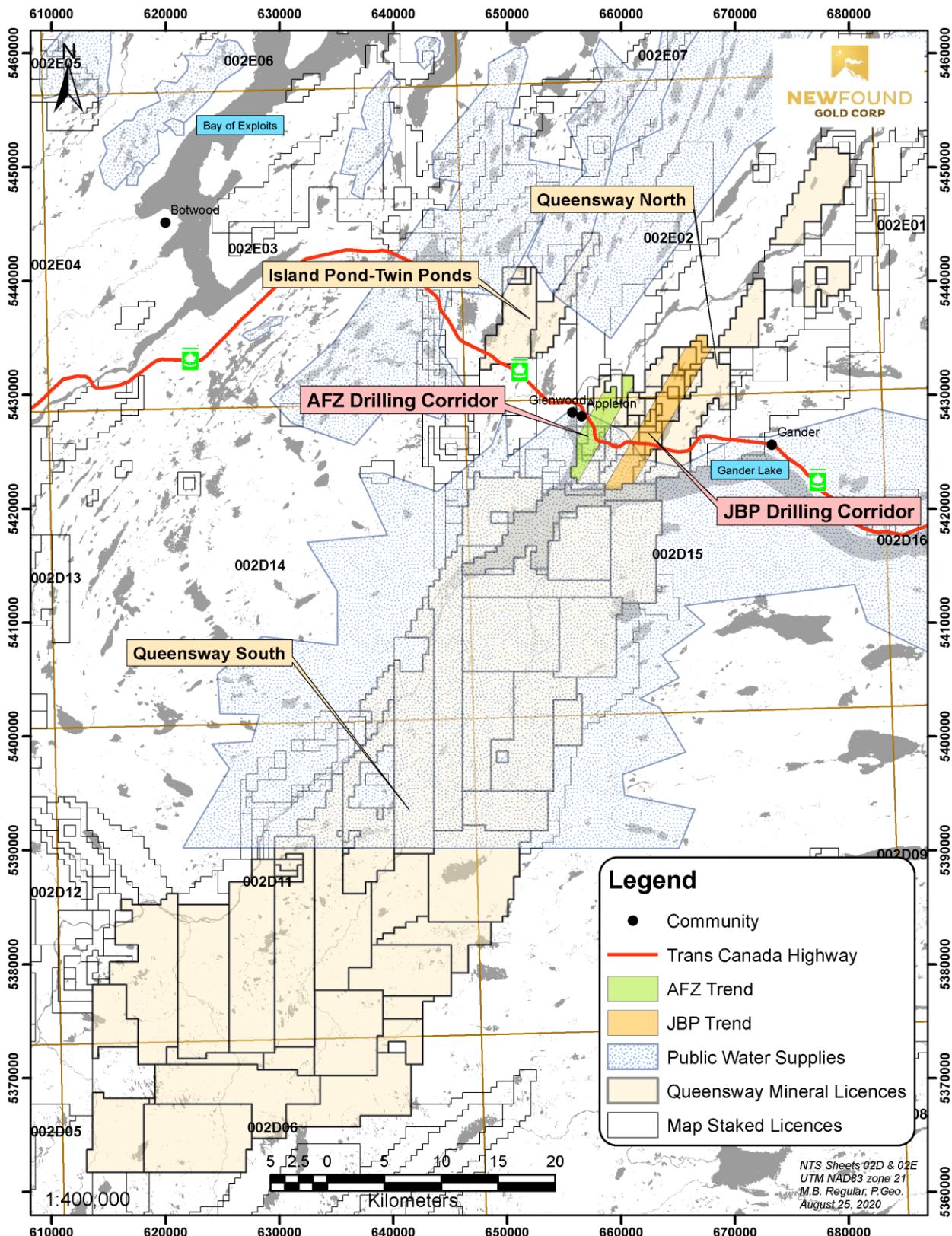
### 10.3 Site Specific Closure/Rehab Plans

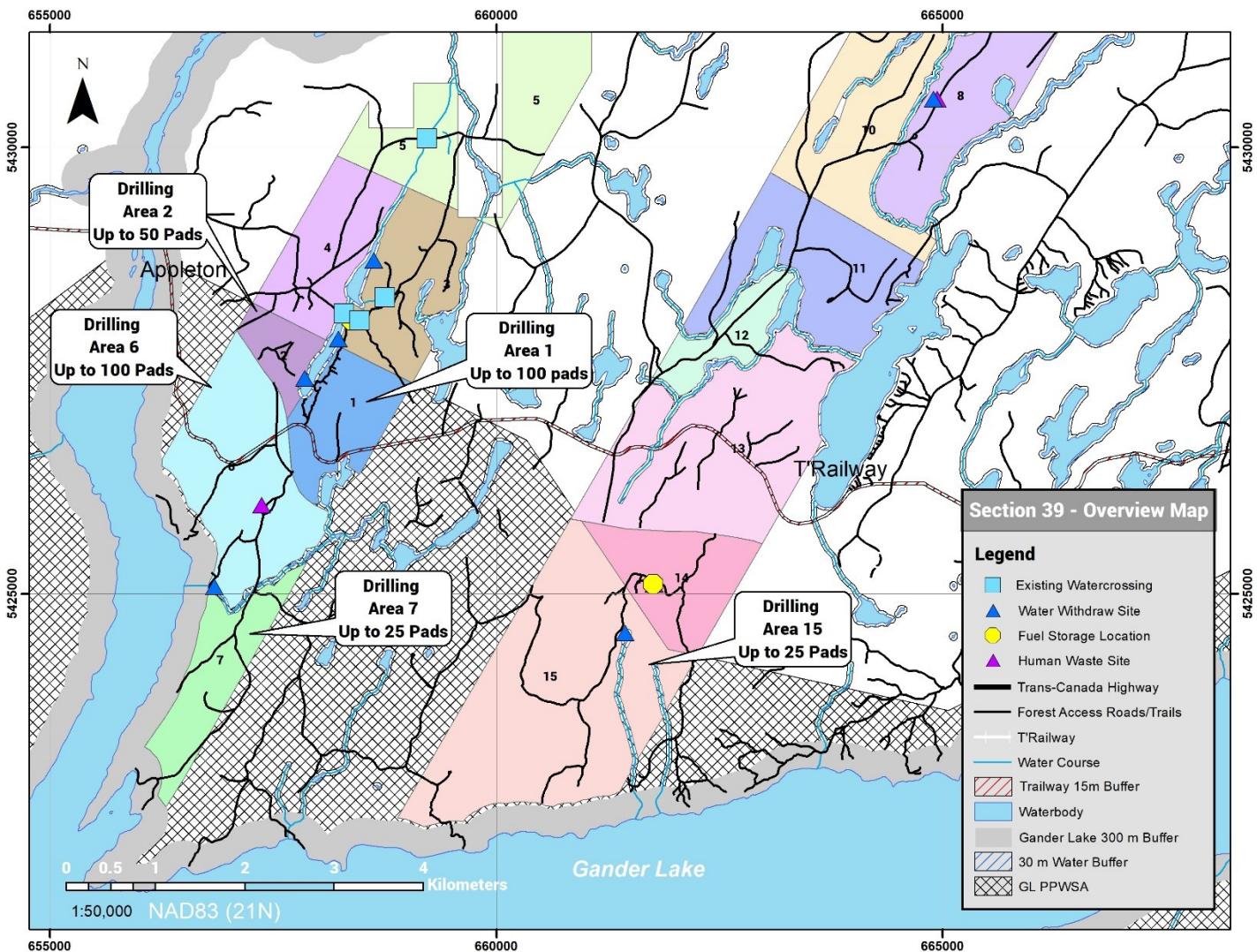
Drill pad sites are to be levelled and covered with existing vegetative materials available at the site. The rehab of the drill site will be photographed via drone or ground imagery post-drilling/post-closure. Drill hole collars will be plugged and grouted (cemented) from a depth no less than 10 metres below the bedrock interface to 10 metres above the bedrock interface such that no artesian flow can occur. Drill pad locations will be periodically seeded with an approved reclamation mixture of native seeds to encourage root development and limit erosion.

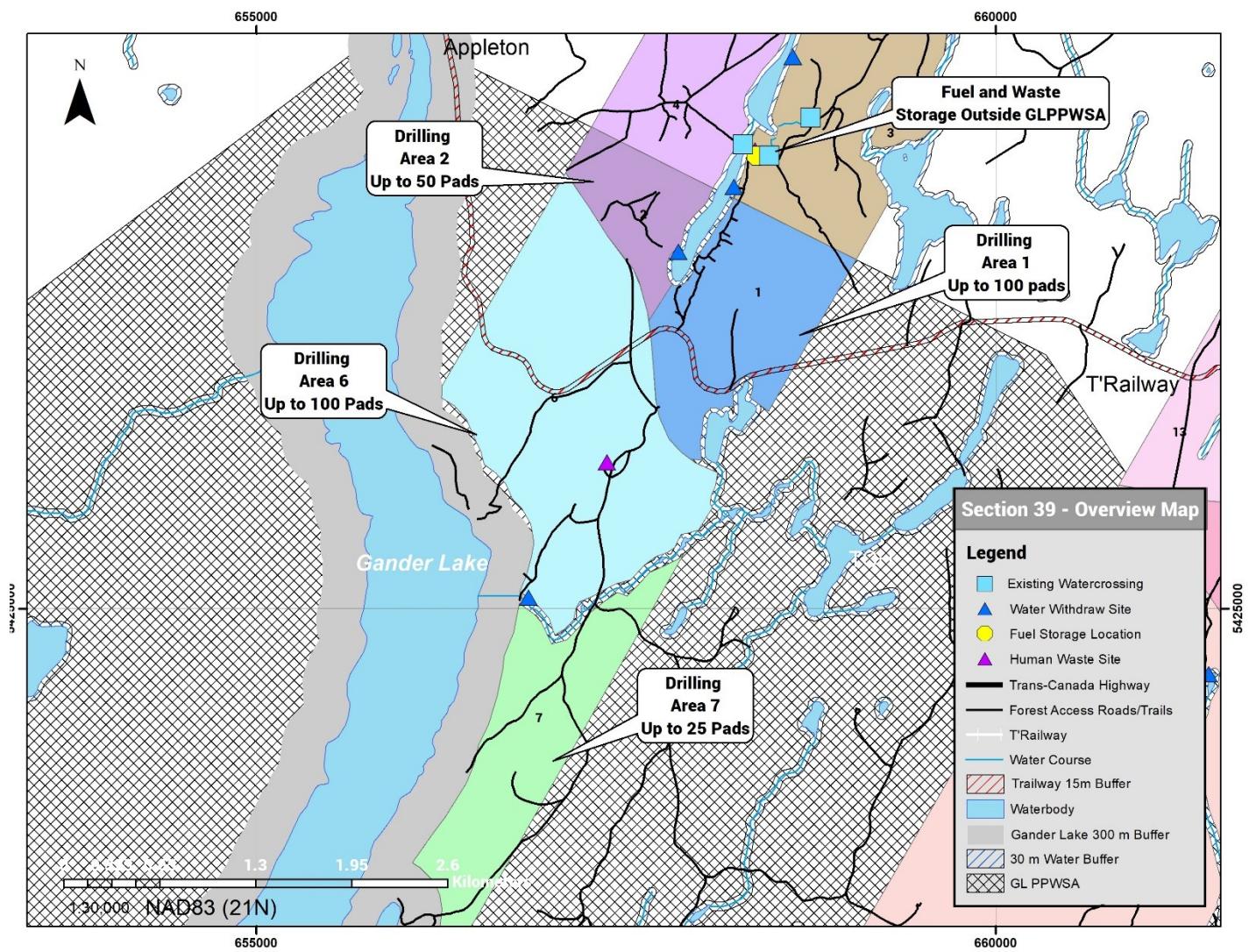
All drill cuttings are contained in sumps and the drill discharge water is recycled until drilling is completed at the site. Sumps are made to settle for three to four weeks and discharge to the environment when the total solid suspension reads 30 ppm. The area is then reclaimed and seeded with hydroseeding and haybales to reduce erosion. Silt fences are also installed at drill pads that are likely to lead to sedimentation in the nearby ponds, creeks or brooks.

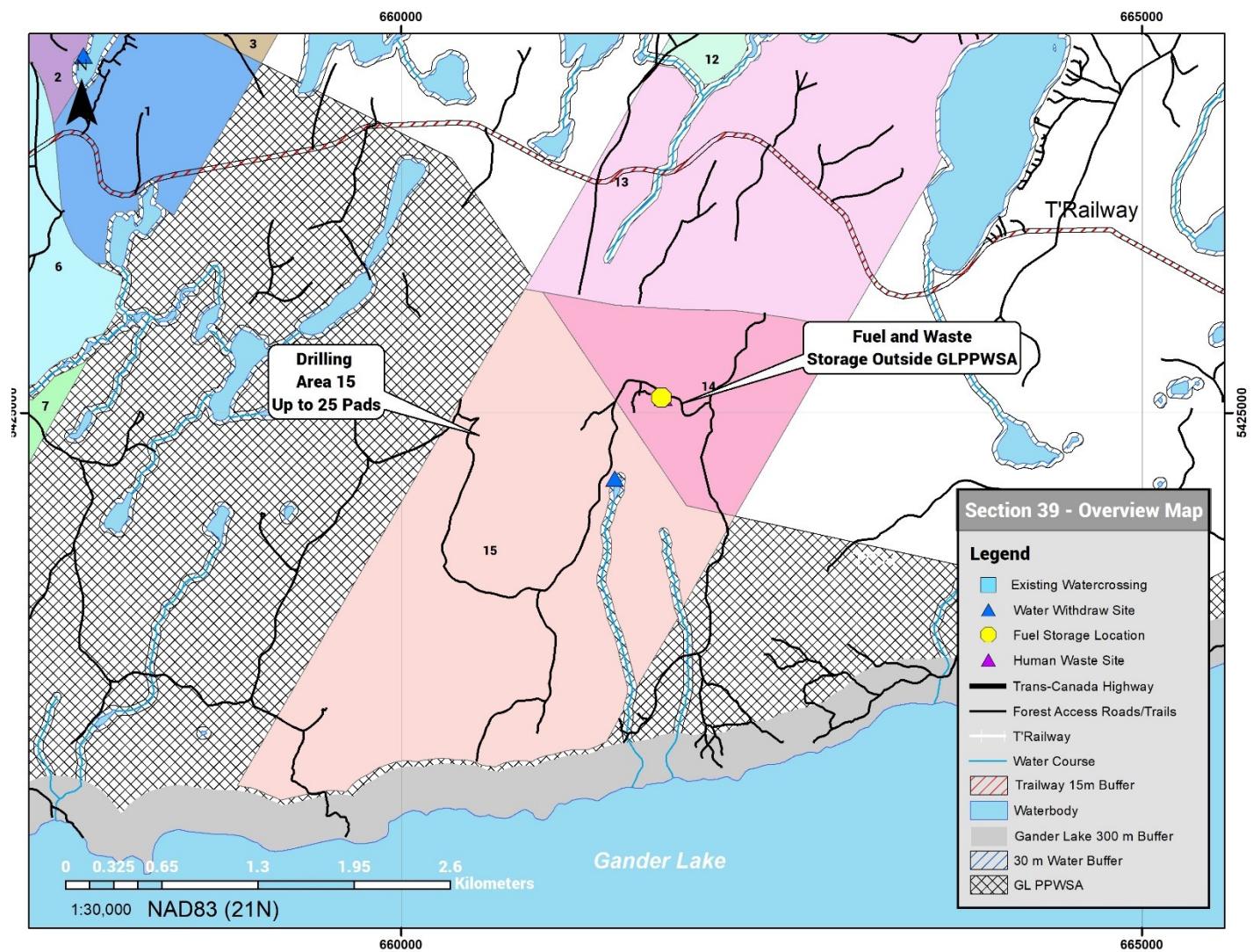
New drill trails will be scarified and allowed to revegetate naturally or as required seeded with an approved reclamation mixture. Existing roads will be repaired where use has caused degradation.

Post-drilling inspections are to include visual appearance, evidence of petroleum products, any trash left at the site and monitoring of natural drainage of the site.









**Proposed Work Locations:**

Planned Site	Easting (NAD 83)	Northing (NAD 83)
<b>Water Withdraw Point (Area 3+4) - Outside of GLPPWSA</b>	658227	5427850
<b>Water Withdraw Point (Area 2)</b>	657852	5427412
<b>Water Withdraw Point (Area 6+7)</b>	656838	5425075
<b>Water Withdraw Point (Area 15)</b>	661439	5424556
<b>Water Withdraw Point (Area 3) - Outside of GLPPWSA</b>	668627	5428731
<b>Water Withdraw Point (Area 8+9)</b>	664897	5430539
<b>Fuel and Oil Storage (Area 1+2+3+4+5) - Outside of GLPPWSA</b>	658380	5428061
<b>Fuel and Oil Storage (Area 13+14+15) - Outside of GLPPWSA</b>	661754	5425106
<b>Human Waste Site (Area 1+2+3+4+5) - Outside of GLPPWSA</b>	658369	5428098
<b>Human Waste Site (Area 6+7)</b>	657368	5425991
<b>Human Waste Site (Area 13+14+15)</b>	661768	5425103
<b>Human Waste Site (Area 8+9+10+11+12+13) - Outside of GLPPWSA</b>	664941	5430543

## **Spill Response Contact Details**

<b>NEW FOUND GOLD CORP</b>
<b>Abigail Amo, Environmental Lead</b> 300 Garrett Drive Gander, Newfoundland A1V 0H5 Cell: (709) 7639480 Email: <a href="mailto:aamo@newfoundgold.ca">aamo@newfoundgold.ca</a>
<b>Greg Matheson, COO (acting site manager)</b> 69 Yonge St. Suite 1010 Toronto, Ontario M5E 1K3 Cell: (705) 570-1233 Email: <a href="mailto:gmatheson@newfoundgold.ca">gmatheson@newfoundgold.ca</a>
<b>Kevin Keats, Site Manager</b> 300 Garrett Drive Gander, Newfoundland A1V 0H5 Cell: (709) 424-1077 Email: <a href="mailto:kkeats@newfoundgold.ca">kkeats@newfoundgold.ca</a>

## MOECC Spill Reporting (800) 563-9089

### Emergency Contact Numbers (Newfoundland and Labrador)

Provincial Contacts	
<b>DNR-Mines</b> - St.Johns, NL (Matthew Snow – Mineral Exploration Site Inspector)	TEL: (709) 670-5798
<b>DMAE</b> - St. Johns, NL (Janice McCarthy-Senior Engineer)	TEL: (709) 729-7634
<b>DMAE</b> - St. Johns, NL (Shabnam, Mostofi – Environmental Engineer)	TEL: (709) 729-2657
<b>GLWMC</b> - Gander, NL (James Blackwood – Committee Chair)	TEL: (709) 651-5915
<b>MOECC</b> - Atlantic	TEL: (800) 563-9089

Federal Contacts		
<b>MOECC</b> - Downsview, ON	TEL: (416) 739-4809	FAX: (416) 739-4776
<b>DFO</b> - Ottawa, ON	TEL: (613) 993-0999	FAX: (613) 990-1866

General Emergencies - <b>911</b>	
<b>Police (RCMP)</b> -	TEL: (709) 256-6841
<b>Ambulance</b> - Gander	TEL: (709) 651-2111
<b>Air Ambulance</b> - Gander	TEL: (709) 777-6320
<b>Forest Fire</b> - FLR Fire Management	TEL: (866) 709-3473
<b>Hospital</b> - Gander	TEL: (709) 256-2500
<b>COVID-19 HOTLINE</b>	<b>811</b>

Environmental Contractors	
<b>H. Warehams &amp; Sons</b> (Vacuum truck services)	TEL: (709) 256-4753
<b>Petroleum and Environmental Services Inc.</b> (Environmental First Responders)	TEL: 1 (877) 449-2335

<b>PBO Industrial Disposal</b> (Solid Waste Disposal)	TEL: (709) 489-9896
<b>Feldhams Construction</b> (Porta-Jon Rentals) (Vacuum truck services)	TEL: (709) 533-3322

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<b>Date Issued:</b> April, 2021			



# Waste Management Plan

## Mineral Exploration Activities Queensway North Gold Project

New Found Gold Corp.  
300 Garrett Drive  
Gander, NL, A1V 0H5

April, 2021

 <b>NEW FOUND GOLD CORP.</b> <b>WASTE MANAGEMENT PLAN</b> <b>Queensway North Gold Project</b>	<b>NEW FOUND GOLD CORP.</b> <b>WASTE MANAGEMENT PLAN</b> <b>Queensway North Gold Project</b>	<b>Version:</b> 1.0	<b>Page:</b> ii of 24
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<u>Emergency Phone Numbers</u>	
<u>Organization</u>	<u>Phone</u>
Bell Place Community Health Centre	1-709-651-6225/6241
James Paton Memorial Regional Health Centre	1-709-256-2500
Gander RCMP	1-709-256-6841
Gander Fire Department	1-709-673-4333/3394
Gander Fire Rescue	1-709-256-8887
Department of Transportation & Infrastructure – Central Region	1-709-292-4163
Emergency Measures Organization – Fire and Emergency	1-709-729-3830/729-1608
Health and Community Services - Poison Control Centre	1-709-722-1110 Toll Free 1-866-727-1110
Department of Environment, Climate Change and Municipalities (PPD))	1-709-729-5782
Occupational Health and Safety	1-800-563-5471
<b>New Found Gold - Main Office</b>	1-709-381-9353
Greg Matheson, P.Geo. – Chief Operating Officer	1-709-570-1233
Mike Regular, P.Geo. – Senior Project Manager, NL	1-709-486-7705
Kevin Keats – Field Manager	1-709-424-1077
Stephen Keats – Occupational Health and Safety Manager	1-709-424-6535
<b>Spill Kits</b>	
Hi-Point Industries	1-709-258-9274
Bishop's Falls, NL	
<b>Dumpsters</b>	
PBO Industrial Disposal	1-709-489-9896
Grand Falls-Windsor, NL	
<b>Spill Response</b>	
Petroleum & Environmental Services	1-877-449-2335
Appleton, NL	
<b>Vac Truck Services</b>	
Feltham's Construction	1-709-533-3322
Glovertown, NL	
<b>Industrial Waste Disposal</b>	
Exploits Salvage and Demolition Ltd.	1-709- 489-1170
Grand Falls-Windsor, NL	
<b>Waste Oil Disposal</b>	
Pardy's Waste Management	1-709- 368-4350
St. John's, NL	
<b>Hazardous Waste Disposal</b>	
Terrapure Industrial	1-709- 834-7350
St. John's, NL	



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## 1.0 INTRODUCTION

New Found Gold Corp. (NFGC) is a publicly traded mineral exploration company (NFG:TSX-V) exploring for gold in the central portion of the Island of Newfoundland (Figure 1). NFGC submitted an Environmental Registration document detailing their planned exploration activities specific to the Queensway North Gold Project (the Project) to the Newfoundland and Labrador (NL) Environmental Assessment Division (EAD) on October 30, 2020. On December 17, 2020, the Project (2106) was released from the EA process with a number of conditions and recommendations. A recommendation from the Pollution Prevention Division (PPD) of the Department of Environment and Climate Change (DECC) was the development of a comprehensive Waste Management Plan (WMP) for the Project.

This WMP is applicable to Queensway North Gold Project and includes the following activities:

- Up to 200,000 metres (m) of core drilling in up to 1500 drill holes in the Appleton Fault Zone, Joe Batts Pond Fault Zone.
- Trenching in selected areas where anomalous gold numbers have been indicated from both grab rock samples and till sample surveys.
- Airborne and ground based geophysical surveys over new ground or untested ground.
- Geochemical surveys combined with prospecting and mapping.
- Geophysical interpretation and spectral interpretation of lithologies from core and satellite imagery.
- Line cutting, including limited seismic, on the same property described in the original Registration document (Registration 2061) released from EA review in October 2020.

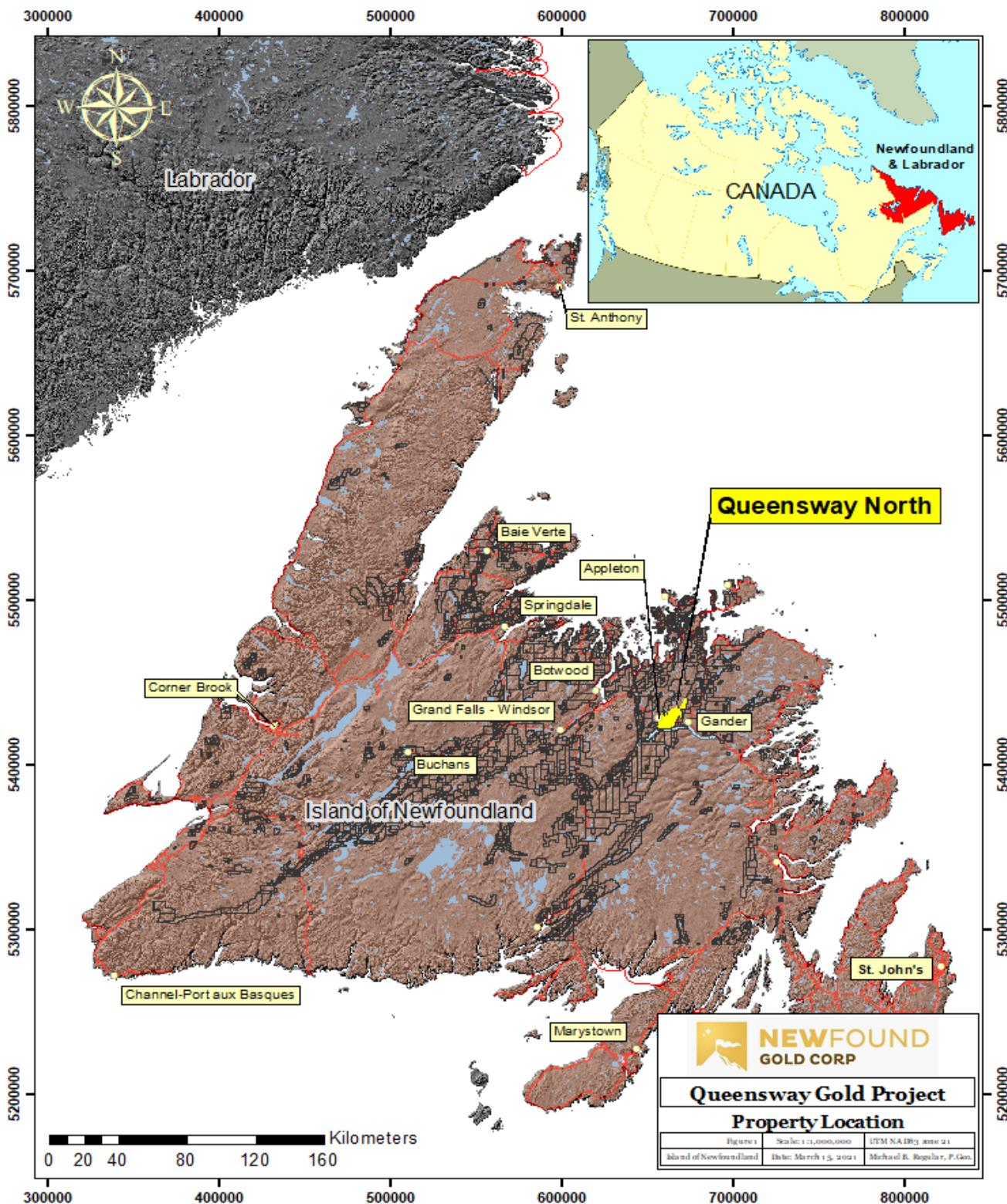
The Project will require the creation of drill pads and access trails extending from existing forest access roads and trails. Drill pads are areas temporarily cleared of brush and trees (15 m radius) to allow the operation of an exploration drill rig. Drill access trails are temporary trails (5 m) cleared of brush and trees to allow access to the drill pads. There are no remote camps associated with the Queensway North Project. During the field season NFGC contractors and personnel stay at rented outfitter lodges as required, and drill crews stay at a commercial camp at Twin Ponds, west of Appleton.. A second registration document specific to line cutting and associated exploration work in the same area will be submitted in Q2 2021.

This WMP provides information on the management of liquid and solid waste generated as a result of Project activities. All waste types are identified and a description of waste management practices from generation to treatment and/or disposal are provided. This WMP considers basic waste management principles of reducing, reusing, recycling and recovering, and appropriate disposal options for Project waste generated.

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The WMP demonstrates NFGC's commitment to environmental compliance, as well as to ensuring the health, safety and well-being of all personnel involved in the Project.

Figure 1: Project Location



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## 1.1 Project Location

The Queensway North Gold Project (Northern extents of the Queensway Project) is located approximately 15 kilometers (km) west of the Town of Gander and just east of the Town of Appleton in central Newfoundland, NL (Figure 1). The Queensway North Project consists of 631 claims as part of 36 mineral licences covering an area of 157.75 km<sup>2</sup> or 15,775 ha. The Project spans 1.0 to 12 km width, and stretches 111 km from the Baie d'Espoir Highway to Little Rocky Brook north of Jonathan's Pond Park (Figures 2 and 3).

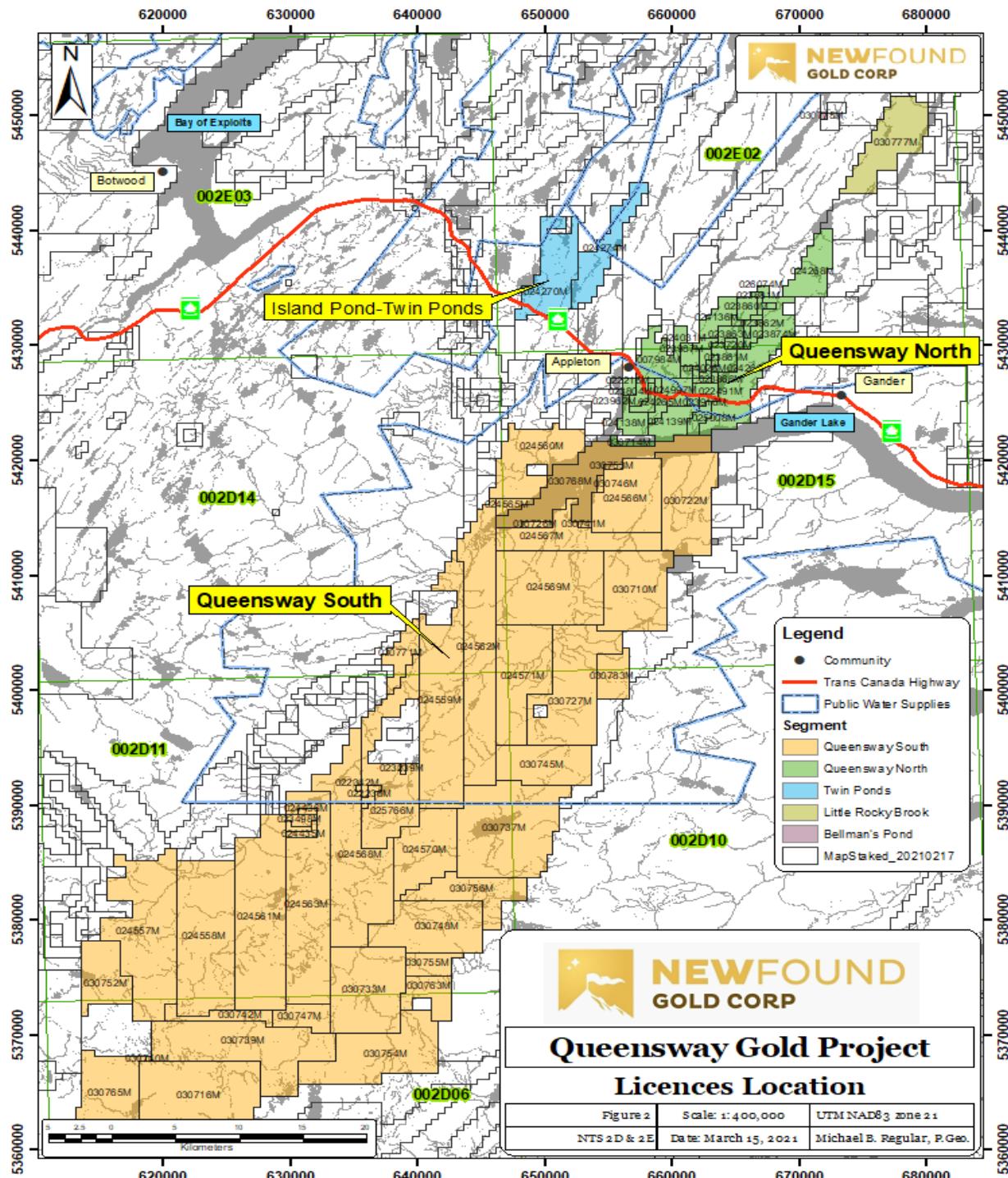
## 1.2 Objectives and Scope of the WMP

The objective of NFGC's WMP is to ensure that all wastes produced by Project activities are handled, stored and/or disposed of in a safe and responsible manner, and complies with all applicable legislation, regulations, authorizations, permits and licenses for the duration of the Project. The WMP provides a waste management system to deal with waste streams and allows for the implementation of reduction and diversion opportunities. The WMP also serves as an internal quality control document that provides clear and concise direction for company staff and contractors regarding waste management policies and procedures that must be followed.

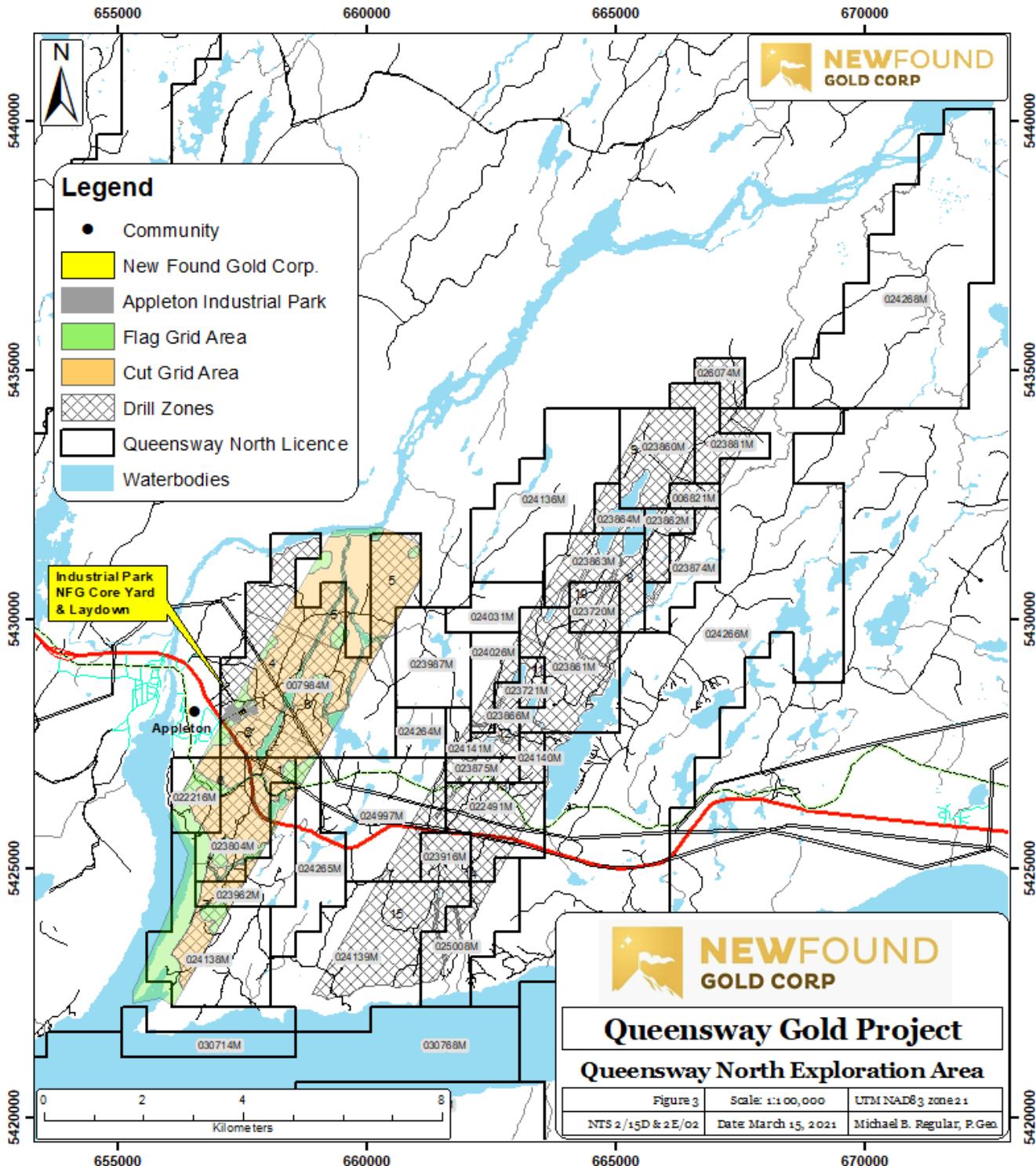
The objectives of this WMP are to:

- Ensure compliance with applicable acts, regulations, and standards;
- Promote compliance with industry guidelines and best management practices;
- Minimize adverse effects on the environment;
- Incorporate and optimize the basic principles of waste management including reduce, reuse, recycle, recovery and residual waste disposal;
- Identification and classification of potential wastes types and quantities generated;
- Provide guidelines for proper collection, segregation, storage and disposal of waste;
- Minimize the amount of waste generated;
- Reduce waste disposal costs;
- Protect the health and safety of Project personnel; and
- Ensure compliance with waste management protocols through operator and attendant training, appropriate surveillance and monitoring, and audits.

**Figure 2: Mineral Claims and Licenses – Queensway Project**



**Figure 3: Queensway North Exploration Areas**



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NFGC is committed to ensuring that collection, storage, transportation and disposal of all waste generated is conducted in a safe, efficient and environmentally compliant manner. The first essential step toward achieving these goals is the preparation of this WMP that identifies potential waste streams and establishes roles and responsibilities for all site personnel. There will be contractual obligations of each contractor to manage wastes generated at the Project site, however the principals and details provided in this WMP will be standard for all personnel.

The WMP will be reviewed on an annual basis and will be updated as necessary to accommodate changes in the Project.

NFGC is committed to minimizing the impact of its exploration activities on the environment, and to protecting the safety of nearby communities, personnel and contractors, and wildlife. The WMP will act as a directive for the proper handling and management of a variety of waste streams resulting from the Project.

The scope of the WMP is described as follows:

- Identify roles and responsibilities of Company personnel in the execution of the WMP;
- Identify all potential waste streams from Project activities;
- Identify procedures to promote reduction, reuse, and recycling of waste materials;
- Identify practices and procedures for waste handling, collection, storage, transport, and disposal; and
- Identify waste monitoring and mitigation procedures.

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## 2.0 REGULATORY FRAMEWORK

The WMP is informed by the regulatory framework for industrial waste management in NL and considers legislation, regulations and guidelines at the federal, provincial and municipal levels. The key regulations and guidelines that may apply to waste management for the Project are provided below.

### 2.1 Provincial Acts and Regulations

- *Transportation of Dangerous Goods Act and Regulations;*
- *Fire Protection Act and Regulations;*
- *Water Resources Act;*
- *Environmental Protection Act;*
- *Storage and Handling of Gasoline and Associated Products Regulations;*
- *Used Oil Control Regulations;*
- *Air Pollution Control Regulations;*
- *Water and Sewer Regulations;*
- *Occupational Health and Safety Act and Regulations;*
- *Workplace Hazardous Materials Information System (WHMIS) Regulations;* and
- *Waste Management Regulations.*

#### 2.1.1 Provincial Guidelines

- The Provincial Solid Waste Management Strategy (NL);
- Best Management Practices for storage of waste, dangerous goods/hazardous waste (WDG/HW) at business sites;
- Management of Waste Dangerous Goods/Hazardous Waste (WDG/HW) 2003-2013 for Newfoundland and Labrador;
- Environmental Standards for Construction and Demolition Waste Disposal Sites;
- Guide for the Disposal of Off the Road (OTR) Tires and Tire Material;
- NORM Waste Management; and
- Landfill Bans, Special Wastes and Diversion Programs.

### 2.2 Federal Acts and Regulations

- *Canada Environmental Protection Act;*
- *Transportation of Dangerous Goods Act and Regulations;* and
- *Canada Fisheries Act.*

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## 2.3 Definitions

For purposes of this WMP, waste includes both Solid (Municipal Solid Waste) and Special Waste. Under the NL Solid Waste Management Strategy (NLSWMS), municipal solid waste (MSW) includes garbage, refuse, rubbish, litter and other discarded materials resulting from residential, commercial, institutional and industrial activities which are commonly accepted at a municipal solid waste management facility, mixed or unmixed.

Under the NLSWMS, Special Waste includes any waste material that requires special treatment or disposal precautions, due to its nature, quantity, volume, potential to react and/ or potential to produce an adverse effect. Examples include, animal carcasses/mortalities or roadkill, asbestos containing material, fish plant waste, and process related commercial or industrial waste streams.

Hazardous waste or material is defined in NLSWMS as wastes or materials that are corrosive, reactive, flammable, ignitable, carcinogenic, teratogenic, mutagenic, infectious, oxidizing, radioactive, explosive, poisonous/toxic (acute and chronic), bioaccumulative, persistent, TCLP\* (Toxicity Characteristic Leaching Procedure USEPA 1311) leachable toxic, or any wastes which do not meet any of the above criteria but have other properties of concern which are significant enough to consider the material to be hazardous.

Hazardous waste is any waste which contains a hazardous substance in such a quantity liable to cause death, injury or impairment to living beings, pollution of water, air and soil, or unacceptable impact on the environment, if handled, treated or disposed of improperly. Includes 'waste dangerous goods' as defined under the NL *Environmental Protection Act*.

A hazardous waste transporter (licensed) is a company that holds a Certificate of Approval to transport hazardous waste in NL as issued under the *Environmental Protection Act*.

Regulated wastes include any waste material which is specifically regulated as hazardous and dangerous for transport. All waste for this project will be classified into three basic categories from which best management practices can be applied.

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### **3.0 ROLES AND RESPONSIBILITIES**

All Project personnel will have roles and responsibilities relative to appropriate waste management and the execution of the WMP. The effectiveness of the WMP depends on the commitment and actions of all personnel.

#### **3.1 Management Commitment**

NFGC is committed to the preservation and protection of the environment and commits to the implementation, maintenance and upgrading of this Plan that incorporates existing waste management strategies with new initiatives.

The management of NFGC recognizes that staff time and resources are required to implement and maintain the WMP.

#### **3.2 Field Manager**

The Field Manager will be responsible for the overall management of contractors managing Project waste and for reviewing Plan initiatives and procedures with Occupational Health and Safety (OHS) Manager. This will ensure that the Plan is carried out pursuant to all applicable regulations and requirements, and that the Plan will be effectively implemented.

#### **3.3 Occupational Health and Safety Manager**

The OHS Manager will provide guidance and expertise to the senior NFGC's management team on all aspects of waste management activities. In addition, the Field Manager will:

- Support waste management orientation and awareness training for all NFGC employees and contractors.
- Review results of routine monitoring and/or audits specific to waste handling, infrastructure, equipment and contractors as part of the continual approval process.
- Consult with regulators relative to waste management and recycling programs as required.

#### **3.4 Senior Project Manager**

The Senior Project Manager will be responsible for ensuring onsite operational compliance with the Plan at all time. In addition, the Senior Project Manager will:

- Review onsite waste management needs and contract requirements with the OHS Manager and Field Manager.
- Report any health and safety issues relative to the WMP to the OHS Manager.

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- Respond to any urgent onsite waste management issues.
- Report on any issues relating to the implementation of the WMP.
- Forward results of routine monitoring and/or audits relative to waste handling, infrastructure and equipment to the OHS Manager.
- Collect and maintain all records pertaining to waste management activities for compliance monitoring.
- Maintain all necessary documentation relative to the transportation, final disposal location and disposal process for all waste removed from Project sites to the OHS Manager.

### **3.5 Employees**

Generally, all employees will be aware of and understand the waste management requirements specific to their area or type of work. In addition, all employees:

- Are encouraged to increase their efforts and awareness in waste reduction, reuse and recycling.
- Will participate in a site waste management orientation and training session and acknowledge receipt of this information.
- Are encouraged to share feedback with management related to site waste management practices, participating in efforts for continuous improvement.

### **3.6 Contractors**

There will be several contractors, including New Valley Drilling Company Limited and Rally Drilling Services, involved in the Project. Each will have obligations to manage waste generated at the Project site. Contractors will be responsible for:

- Contractual obligations pertaining to managing and disposing of their own wastes generated at the Project site.
- Compliance with protocols outlined in this WMP.
- Ensuring waste materials are disposed of in accordance with Material Safety Data Sheets (MSDS) and waste disposal site requirements.
- Development of waste management strategies, in consultation with Newfound Gold, for the work being executed.
- Providing the necessary training to their employees for waste management requirements unique to their activities and/or work areas.

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#### 4.0 WASTE CHARACTERIZATION

An effective WMP endeavors to provide a qualitative and quantitative characterization of the waste materials being generated. This characterization establishes the baseline conditions and serves as a guide for monitoring and auditing. A material becomes waste when it can no longer be used for its original intended purpose. Waste types considered in this WMP include non-hazardous waste such as cans, filters, scrap metal, drill cutting and domestic garbage, and hazardous waste such as used oils, and solvents.

The WMP is intended to be flexible and responsive to changes in the various waste management streams, and includes provisions for reporting and monitoring procedures. These procedures will:

- Provide a means to review waste quantities generated and their segregation into specific waste streams;
- Provide appropriate infrastructure and equipment for handling waste materials;
- Establish appropriate collection frequency of waste materials; and
- Assist in assessing the feasibility of new waste reduction, diversion and disposal options.

A list of potential waste materials, sources and disposal categories based on anticipated waste streams are provided in Table 1 and Table 2 below.

**Table 1: Waste Handling, Storage and Disposal Categories – Non-Hazardous Materials**

Category	Waste Type	Source	Initial Storage Location	Management/Disposal
General	Domestic waste (all materials that cannot be recycled or reused)	All Areas	Laydown Area	Landfill
	Phones, computers, monitors, printers and related hardware	Office	Laydown Area	Recycled/reused
Sewage	Biological waste	Drill Sites & Office	Portable Toilets	Vacuumed out and disposed of in certified location
Drill and Core Cuttings	The sump is allowed to settle, and water is drained to a centralized settling pond via 2 inch hoses and pumps. The remaining cuttings are collected using Vac Truck technology on wheels or floats and transported to a holding tank. Periodically the cuttings holding tank is again vac trucked and transported to a landfill. Cuttings from sawing core.	Drilling and Core Sawing Activities	Sump adjacent to drill setup and Core Storage	Settling pond and vac truck to landfill
Beverage Containers	Aluminum cans, plastic beverage & food containers, glass bottles, drink boxes etc.	All Areas	Laydown Area	Recycled/Landfill

Category	Waste Type	Source	Initial Storage Location	Management/Disposal
Food	Personnel lunches	All Areas	Laydown Area	Landfill
Wood and Paper	Pallets	All Areas	Laydown Area	Landfill
	Wire/cable spools	All Areas	Laydown Area	Recycled
	Scrap wood	All Areas	Laydown Area	Landfill
	Cardboard and Paper	Office	Laydown Area	Recycled
	Drilling Rods	All Areas	Laydown Area	Recycled or Reused
Metals	Scrap metal, piping, saw blades, small parts and machinery	All Areas including core storage	Laydown Area	

**Table 2: Waste Handling, Storage and Disposal Categories – Hazardous Materials**

Category	Waste Type	Source	Initial Storage Location	Management/Disposal
Hazardous Materials	Aerosol cans	All Areas	Hazardous Materials Storage/Laydown Area. In appropriately labelled containers.	Licensed Contractor
	Lithium/NiCad batteries			
	Spray Paint			
Hydrocarbon Materials	Biomedical Waste <ul style="list-style-type: none"> <li>Materials such as bandages, gloves, needles, dressing etc.</li> <li>COVID19 testing swabs</li> </ul>	Office	Office – proper waste container and/or sharps container	Nurse or Licensed Contractor
	Fuel and oil filters	Mobile Equipment	Hazardous Materials Storage/Laydown Area. In appropriately labelled containers. Berms will be in place, where required.	Licensed Contractor
	Solvent/oil contaminated rags, workwear, and absorbent pads			
	Used oil			
	Grease tubes			
	Hydraulic hoses			
	Solvents and oils			
	Glycol			

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## 5.0 ORIENTATION, AWARENESS AND TRAINING

Information on the Project WMP will be provided to all new employees, contractors and consultants during standard site orientation training. Project personnel and contractors will undergo regular training and refreshers to ensure they are familiar with potential environmental issues, roles and responsibilities, mitigation requirements, communication of concerns, and emergency response procedures. Additional information and training will be provided on an individual basis, specific to the work area of the employee, contractor and/or consultant as required.

Minimum training requirements for Project personnel and contractors include:

- Identification of waste streams, and proper disposal and storage procedures for each;
- WHMIS; and
- Emergency and spill response.

A record of all personnel trained (e.g., employees, staff, contractors and consultants), dates of training, and any updates or additional training required will be maintained by the OHS Manager.

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## 6.0 OPERATIONAL PROCEDURES

### 6.1 Waste Disposal

There will be no on-site waste disposal. All waste will be collected onsite and disposed of, recycled or reused off-site.

Off-site waste includes waste materials to be recycled, reused, treated, stored, sent to an off-site landfill, or returned to distributors. All waste products to be disposed of off-site will be handled by designated and trained employees.

The nearest commercial waste storage facility to the Project is the Central Newfoundland Waste Management (CNWM) facility located at Norris Arm North, approximately 30 km west of Appleton on the Trans-Canada Highway (TCH). This facility serves all communities of the region and is a state-of-the-art waste management facility using one of the most progressive recycling and garbage programs in Canada ([www.cnwmc.com](http://www.cnwmc.com)).

Recycling bins will be stored at various locations at the Project site to collect recyclables, e.g., air filters, batteries, pop bottles, etc., before they are transported offsite to the nearest recycling depot or donated to an organization, as applicable.

Items such as clean, non-recyclable metals and other inert materials will be trucked to the designated landfill. Non-recyclable empty containers and steel drums will be drained, flushed if necessary, crushed and disposed of in the landfill. All non-recyclable scrap vehicle parts and machinery will be drained of their petroleum products prior to transporting to an offsite landfill or salvage yard. Inert office refuse, non-recyclable metal materials and other non-recyclable materials will also go to landfills.

Food waste will be placed in covered containers at the Project site and hauled to the nearest permitted landfill or solid waste disposal site as required.

Non-recyclable and non-hazardous waste will be collected in bags and brought to dumpsters or to the Norris Arm North Landfill at least once a week. This waste will be collected from drills, vehicles, office trailer and the shed at the core storage yard.

NFGC maintains four plots of land in the industrial park on Simms Road in Appleton (Figure 4). Two of these plots are fenced, have several trailers and sea cans and are used as a core storage yard. The remaining two plots will serve as a laydown area and multi-purpose plot for whatever is needed. The core logging facilities in Gander will follow the same protocols for the collection of recyclable and non-recyclable waste. The core logging facilities are located at 300 Garret Drive and 51 McCurdy Drive in Gander.

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Used oil filters will be crushed or drained, then collected by approved handling companies. Waste oil, oily rags and used absorbent materials will also be collected and stored in appropriate containers before disposal by an approved waste management company.

Drill cuttings will generally remain onsite and will be collected directly into a sump adjacent to each drill setup and outside all required buffer areas. Drill cuttings will be removed from areas associated with the PPSWSA. This procedure is in accordance with NFGC's current exploration license.

Hazardous wastes will be handled by trained personnel in accordance with provincial regulations. If any materials are not designated for a disposal site, they will be sorted and shipped to an approved company for recycling or disposal.

## 6.2 Waste Diversion and Reduction Programs

NFGC recognizes that although waste cannot be completely eliminated, the amount of waste designated for disposal can be reduced. Waste diversion is a method of reducing the amount of landfill material to remove waste volume from the waste stream. Waste diversion is based on a strategy of reducing, reusing, recycling, recovery, and eventual disposal.

Both waste diversion and waste reduction programs contribute to decreasing the volume of waste materials produced, reducing the cost of purchased materials, and increasing the return, rebate and sale of recyclable or reusable materials. NFGC management will review the WMP waste reduction and diversion practices on a regular basis. That review will, at a minimum, cover the following aspects:

- Purchasing practices;
- Packaging materials;
- Supplier rebates;
- Recycling or reuse returns and rebates;
- Regional, government and commercial waste management initiatives, operations and services; and
- Examination of potential partnerships with regional municipalities and businesses to manage waste.

Over the life of the Project, NFGC will actively strive to reduce the volume of waste generated from all waste streams. A number of waste reduction initiatives will be implemented at the start of the Project (Table 3).

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**Table 3: Waste Reduction and Diversion Options and Initiatives**

Initiative	Options and Issues
Reduce amount of food & beverage containers, e.g., glass bottles, plastic bottles, aluminum cans etc.	<ul style="list-style-type: none"> <li>Supply refillable thermos bottles for personnel</li> <li>Install large water coolers and containers</li> </ul>
Increase Project personnel participation in recycling programs	<ul style="list-style-type: none"> <li>Post signage as reminders to use recycling bins</li> <li>Provide concrete examples of recycling benefits, e.g., donations to local charities</li> </ul>
Reduce amount of plastic waste disposed in landfill	<ul style="list-style-type: none"> <li>Investigate recycling possibilities, including suppliers accepting return of plastic containers for re-use</li> <li>Consider bulk packaging possibilities</li> </ul>
Reduce amount of cardboard/paper waste disposed in landfill	<ul style="list-style-type: none"> <li>Maximize amount that can be shredded and added to recycling system</li> <li>Investigate recycling possibilities</li> </ul>
Reduce amount of paper and ink cartridges	<ul style="list-style-type: none"> <li>Implement employee awareness training aimed at reducing paper use and printing, e.g., distribute electronically, double sided printing, print only required documents, reuse one-sided paper, circulate hardcopies where possible</li> <li>Maintain copiers and printers in good repair</li> <li>Use refillable ink cartridges, if possible</li> </ul>
Metal segregation in the Laydown area	<ul style="list-style-type: none"> <li>Separate scrap metal that can likely be reused or recycled from that destined for a landfill</li> </ul>

With diversion practices in place, NFGC is confident that disposal volumes for materials destined for landfills will decrease as the Project advances. Given the nominal waste quantities estimated to be generated for the Project, NFGC has not implemented a tracking system to record volumes of waste generated. However, as the Project advances, and if new waste streams or greater volumes of waste are generated, NFGC will maintain a database/spreadsheet that records approximate volumes of waste material generated and how they were managed.

### 6.3 Waste Handling

By implementing waste reduction practices, the volume of waste material generated over the Project life will be reduced. Waste handling procedures will conform to existing regulations and policies as identified in this WMP, and will be modified to reflect other internal and external regulations and policies that come into effect over the life of the Project.

A summary of the current general waste handling procedures, including collection, storage and transportation practices are provided in Tables 1 and 2. Handling of waste material will be conducted using appropriate equipment and appropriate personal protective equipment (PPE) at all times. Note there are no plans for open burning at the Project site. Should this change, NFGC will apply for and obtain the appropriate permits.

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Handling of waste related to an employee's specific job should be conducted by the employee as required within their normal duties. Depending on the waste type and method of storage, proper training and orientation may be required to ensure that the procedures as outlined in this WMP are followed.

### 6.3.1 Special Waste Handling

Special wastes are defined as wastes that must receive special handling to ensure that the material does not cause contamination, fire or affect the health of personnel. Special wastes may include hydrocarbons, sewage, bio-medical waste, hazardous or any other waste that, when not handled properly, could induce additional risk to personnel or property.

Special waste handling procedures are as follows:

- Special wastes will be handled by employees trained in all aspects of handling, transportation and storage of the material(s), or by a licensed waste disposal contractor.
- Inventory of special waste at the Project site will be completed on a monthly basis.
- All special wastes transported off-site will be in accordance with applicable transport laws, to a facility permitted in NL to receive them, by a carrier permitted in NL to receive and transport special wastes according to the TDG Regulations.
- A movement control document (manifest) will be completed to document each shipment of special waste, as per TDG Regulations.
- Solid waste to be recycled or treated should be separately binned and/or stored in temporary containers until final storage. These wastes include, but are not limited to:
  - Aerosol cans;
  - Lithium and NiCad batteries; and
  - Plastic drums, e.g., totes and bags etc., containing contaminant residues.
- Liquid and liquid contaminated wastes to be recycled or treated will be drummed or put in approved containers ensuring no mixing of materials. These wastes include, but are not limited to:
  - Fuel and oil filters;
  - Solvent or oil contaminated rags, workwear, and absorbent pads;
  - Spray Paint;
  - Grease tubes;
  - Hydraulic hoses;
  - Solvents and oils; and
  - Glycol.



- For drum storage of waste, the following practices will be followed. Drummed waste will be stored in a properly dyked and protected storage area. In addition, adequate spill kits will be located in each area. The Field Manager will be responsible for ensuring that there are proper interim storage areas for these materials. The drums must be clearly labelled indicating their contents, and procedures followed to ensure the materials do not mix. The following handling and storage procedures are required:
  - Full Drums
    - Drums must have proper labelling and have MSDS labels where applicable.
    - Drums must be stored on pallets and in designated areas with proper ventilation to protect from damage.
    - Prior to moving, verify that drums are tightly closed to prevent spills.
    - For multiple drums, ensure drums are secured on pallet before moving.
    - For single drums, use proper slings or secure drum to cart before moving.
  - In-use Drums
    - Drums must have proper labelling and MSDS labels where applicable.
    - Drums must be stored in designated areas with proper ventilation to protect from damage.
    - Prior to moving, verify that drums are tightly closed to prevent spills.
    - When decanting, ensure the installed decanting nozzle does not leak. Use a drip pan when decanting to prevent spills and keep clean-up material nearby. Use only properly labelled decanting containers and do not mix products.
- Bio-medical waste removal from the Project site will be handled by the on-site nurse or contractors trained and certified in the TDG Regulations.
- Appropriate equipment and appropriate PPE will be used at all times when handling special wastes.
- Hazardous products will be transported from site via a licensed transporter to a licensed disposal facility.

### **6.3.2 Waste Transportation**

Specific procedures apply to the movement of waste materials and will be conducted using appropriate equipment and appropriate PPE at all times.

Transportation of waste may include:

- Movement of waste from a work area to the appropriate disposal or temporary storage area.
- Movement of waste from a temporary disposal or storage area to a bulk storage area or off-site.
- Movement of waste from a bulk storage area or laydown area to off-site.

The movement of common or routine waste from a work area to the appropriate disposal or storage area should be completed by a designated employee. The employee should be aware of the type of waste and the proper handling and transportation procedures specific to that type of waste.

The movement of waste from a temporary disposal or storage area to a bulk storage area or off-site storage should be completed by trained waste handling personnel, unless additional employees or contractors are designated to do that.

### **6.3.3 Waste Storage**

Waste storage refers to the storage of waste on on-site temporary pallets, in bins, in laydown areas and in bulk storage areas. The following procedures relative to waste storage should be followed:

- All waste should be stored at the designated location in, or in approved containers, pallets or laydown areas and be in a dyke/berm, if required.
- Storage areas and containers are to be clearly marked and located at approved locations around the site based on the waste generated in each area.
- Waste placed at laydown areas or stored in containers will be collected at appropriate intervals to avoid spillage, overflow or congestion.
- Bulk storage areas will be maintained to ensure safety, will maximize available space and will provide access for waste haulers to all adjacent areas.
- Storage areas will be inspected and assessed to confirm adequate space, storage procedures, access, etc. as required or at a minimum, annually.
- The hydrocarbon and hazardous waste containment area will be properly maintained and inspected to ensure full access, proper storage procedures and early leak or spill detection.
- Used oil storage containers must be inspected and maintained on a regular basis.

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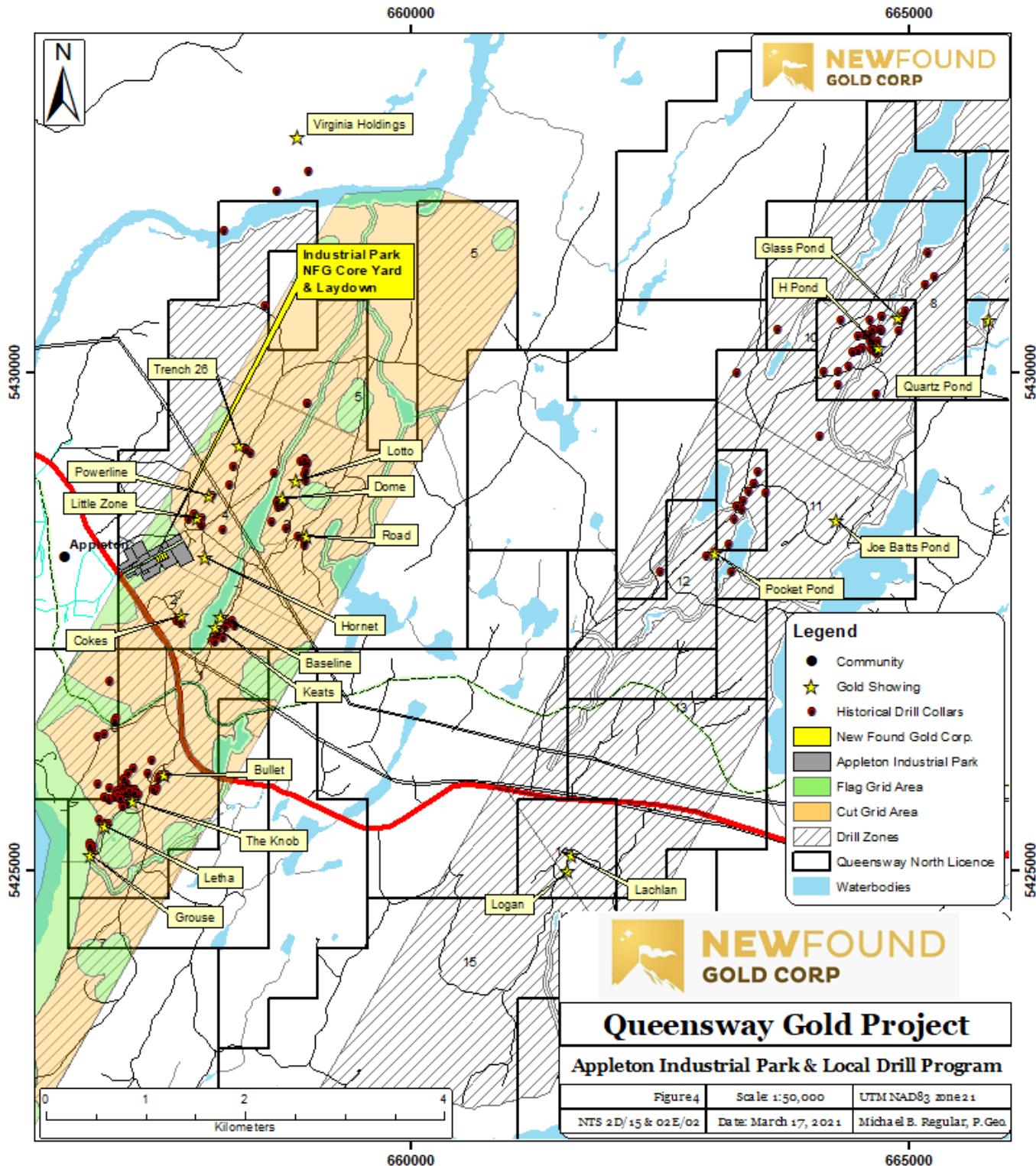
#### **6.3.4 Infrastructure and Equipment Maintenance**

Waste management infrastructure and equipment includes infrastructure and equipment required for the handling, transportation, storage or removal of wastes from various locations at the Project site. The planned layout for a laydown area for temporary waste storage is shown on Figure 4. Note the location may change as the Project advances. In this area, old equipment, scrap metal and wood, etc. will be stored temporarily while awaiting offsite transport for recycling or disposal. A designated storage area within the laydown area will be available for the temporary storage of hazardous waste in acceptable leak proof containers.

All waste management infrastructure and equipment will be maintained to ensure the health and safety of employees and to avoid contamination or degradation of waste during storage or transportation.

NFGC will use Project equipment, e.g., excavators, pickup trucks, dozers, telehandler, to aid in the management of waste materials. Inspection and maintenance of vehicles involved will be routinely carried out as the Project advances. Inspections generally include the following:

- an assessment of the condition of equipment or infrastructure. Any required repairs will be noted and completed, and
- the location of the equipment or infrastructure.

**Figure 4: Planned Location of Laydown Area for Waste Material Storage**


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## 7.0 MONITORING, REPORTING AND AUDITS

Annual review of the WMP will be completed and will identify problems or aspects of the WMP that can be improved on, and appropriate action to address.

### 7.1 Reporting of Problems or Concerns

All NFGC employees are responsible for, and are encouraged to report problems or concerns related to the contents of this WMP.

Issues pertaining to training, waste handling, transportation, storage, infrastructure and equipment should be reported to the Field Manager. Issues will be reviewed and, where appropriate, forwarded to the Senior Project Manager, to be addressed accordingly. A record will be kept of issues identified.

### 7.2 Record Keeping

Records related to the WMP will be kept by the Field Manager and copies will be provided to the Senior Management Team.

Records may include documents and information related to:

- orientation and waste management training;
- waste characterization;
- waste management legislation, regulations and guidelines;
- waste management contractors;
- off-site waste disposal;
- inspections of waste storage facilities; and
- any other aspects or issues related to Project waste management.

All records, including inventory and tracking of hazardous materials transported to site will be maintained and made available for inspection by designated regulatory personnel.

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### 7.3 Routine Monitoring

Routine monitoring of waste management activities will be conducted to ensure that procedures outlined in the WMP are being followed. Routine monitoring may consist of informal or formal checks on personnel, equipment and contractors, and a review of records related to waste management activities.

Monitoring may include, but will not be limited to:

- verifying location and condition of on-site waste and recycling collection bins;
- verifying condition and organization of waste laydown and storage areas;
- verifying waste collection, transportation and handling operations for NFGC employees and waste management contractors;
- verifying waste volumes from the Project site; and
- any other aspects or issues related to the waste management system.

### 7.4 Annual Monitoring, Reporting and Plan Revision

This WMP will be reviewed annually, or as necessary to ensure that all components of the WMP are current and operating properly. The review of the WMP will be conducted by the Field Manager, OHS Managers and the Senior Project Manager.

The annual review will confirm that the WMP:

- conforms with existing, new, and/or upcoming changes in legislation, regulations and guidelines;
- follows existing and potential waste diversion and reduction programs;
- accounts for any new waste streams at the Project site; and
- has functional operational procedures, equipment and infrastructure.

Monitoring of some components of the waste management system may be required prior to, or as a result of the annual review process. If monitoring is required as a result of the review, an additional formal WMP review may be required that may also result in changes.

Revisions to the WMP may only be completed with the approval of the Senior Project Manager. Personnel affected by any revisions or changes will be notified by the Field Manager and their training updated if necessary.

March 10, 2021

Greg Matheson, P.Geo., COO  
New Found Gold Corp.  
P.O. Box 310  
Gander, NL A1V 1W8

Dear Greg Matheson:

I am writing in regards to the Women's Employment Plan that was submitted on January 11, 2021, as a condition of the environmental assessment of the proposed high grade Queensway gold project. The Office for the Status of Women has reviewed this plan and is pleased to see a strong senior-level commitment to gender diversity within New Found Gold Corp (NFGC).

Specifically, the Plan outlines accountabilities for the HR team to meet in order to foster the participation of women, gender diverse individuals, and underrepresented groups in the workforce. Additionally, NFGC acknowledges the barriers faced by women and gender diverse individuals when seeking employment in the natural resources industry and committed to employment number targets in the WEP to help these populations participate in the industry. These are all key elements of a strong Women's Employment Plan.

Women's Employment Plans are designed to improve and increase the participation of women in employment in various industries. These Plans support our Government's commitment to reduce the gender wage gap by increasing women's access to a wider range of employment, particularly in trades and technical occupations. The Provincial Government has made a number of commitments to building a diverse workforce. Indeed, as a part of the Way Forward on Government Infrastructure Women's Employment Plans are now required on infrastructure projects, such as these. We thank you for supporting this commitment with your Plan.

I would like to take this opportunity to congratulate you on your commitment to advancing the economic status of women in the province through this Plan. I am pleased that you have been working with the Office for the Status of Women and will continue this work on a quarterly basis.

Approval is given for your Women's Employment Plan and we look forward to working with you as we strive collectively to increase supports for women, and all individuals in skilled trades and construction industries in Newfoundland and Labrador through inclusive best practices.

Sincerely,



(for) **HON. LISA DEMPSTER, MHA**  
District of Cartwright – L'Anse au Clair  
Minister

Cc: Karen Clyke, P.Geo, New Found Gold Corp.  
Mike Regular, P. Geo, New Found Gold Corp.  
Linda Ross, Deputy Minister, Office for the Status of Women



**NEWFOUND  
GOLD CORP**

**Queensway Gold Project  
Women's Employment Plan**

**P.O. Box 310**

**Gander, NL, A1V 1W8**

**January 2021**

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## **1.0 Introduction**

The Government of Newfoundland and Labrador requires that proponents of large resource development projects, including large mineral exploration programs, develop and implement a Women’s Employment Plan as a requirement of the release from the environmental registration process. Women’s Employment Plans outline proactive policies, practices, and lines of accountability with the aim to help create inclusive work environments free from harassment and discrimination. Outside of actual resource developments, government intervenes in the Environmental Registration and Assessment process to require proponents of mid-size projects with moderate employment and duration of work to develop Women’s Employment Plans (WEPs). In projects requiring contractors, sub-contractors, and unions, it is crucial that shared responsibilities and clear lines of communication are established to ensure adherence to the company’s WEP.

### **1.1 The Queensway Project**

New Found Gold Corporation (NFG) is a publicly traded mineral exploration company (TSX-V: NFG) and is advancing its 100% owned high-grade Queensway gold project, located along the Trans-Canada highway 15 km west of Gander, Newfoundland. A 100,000 m drill campaign is underway, focused on a 5 km trend of the Appleton fault, and will soon expand to test additional targets along +100 km of prospective strike on the 1,500 km<sup>2</sup> Queensway property. The company website is available for additional information.

<https://newfoundgold.ca/>

The company operates out of the Town of Gander and currently owns facilities in Gander and the Town of Appleton. Its exploration activities are focused in an area north of the Trans Canada Highway between Appleton and Gander, as well as a large land package south of Gander Lake. Mineral exploration activities are considered “High Risk” and are results driven. Companies like NFG hire young skilled labour to take advantage of the latest technologies and to realize exploration results in a timely manner.

### **1.2 Queensway Project Timeframes**

New Found Gold expects that its mineral exploration programs could continue for the next 12 to 15 years to adequately define any mineable gold resources. In the shorter term it expects to complete a 100,000 metre drill program that could take 2 to 3 years, with plans to double that amount should results and markets dictate.

### **1.3 Queensway Project Workforce Estimates**

The Queensway Gold Project will include an initial 2750 person months of employment for core drilling, core logging/technical/cutting as well as planned geophysical/Geochemical surveys and traditional prospecting and trenching. Diamond core drilling would be contracted as would any Geophysical Surveys with the remainder of exploration activities conducted by NFGC staff and related crews. A working list of contracted positions and possible staff is attached as Table 1.

Component	Contractor Crew	Minimum Positions	Current Female Positions	Percentage Female
Road Upgrades	Excavator Operator	1	0	0
Road Upgrades	Dump Truck Operators	2	0	0
Trench Digging	Excavator Operator	1	0	0
Drill Pad Mulching	Excavator Mulcher	1	0	0
Core Drilling	Drillers	12	0	0
Core Drilling	Helpers	12	0	0
Core Drilling	Foreman/Runners	2	0	0
Satellite Imagery	Specialists	1	1	100
Airborne Geophysics	Crew	4	1	25
Geophysical Interpretation	Geophysicist	1	1	100
Component	NFG Personnel			
Core Logging	Geologists (Jr)	6	4	67
Core Geoteching	Geotechs	6	1	17
Core Cutting/Sampling	Cutters	6	1	17
Till/Soil Sampling	Prospectors	6	0	0
Rock Sampling/ Prospecting	Prospectors & 4 to 6 Geologists	4	1	25
Channel Sampling	Labourers	2	0	0
Geology/Interpretation	Geologists (Sr)	2	1	50
Reports/Permitting	Technical Report Writers	2	0	0
GIS	Specialist	1	0	0
Office Administration	Admin	1	1	100
Field Managers	Managers	2	1	50
Database Managers	Managers	2	2	100
	<b>TOTAL</b>	77	15	19

Table 1. New Found Gold Corp’s Employment Targets for the Queensway Project.

#### 1.4 Employment Diversity Commitments and Practices

A request for an Environmental Registration from Environment, Climate Change, and Municipalities was made September 18, 2020, the first for a Mineral Exploration Program in Newfoundland and Labrador and is based on Section 28 & 52(2) of the Regulations. With the release of the exploration program form further environmental review on December 17, 2020, it was requested that a WEP be developed and submitted to the Office for the Status of Women for approval.

The WEP will apply to NFG and its primary contractors for all contracts over \$250,000 and encompass both direct and indirect effects of drilling and mineral exploration activities at the Queensway Project. Government is particularly interested in resource-based industries’ approaches to women’s employment including recruitment, career development and advancement, and participation in technical roles.

Throughout this Women’s Employment Plan a series of strategies and specific initiatives will be developed to provide a focused and measurable set of actions aimed at achieving the Company’s overall target for participation by women in all operations. These initiatives build on the following accountabilities that have been given to the Company’s Human Resource Management Team:

- A. Executive staff will be accountable in implementing women’s employment initiatives.
- B. Conduct regular reviews of the women’s employment initiatives with the executive and team members.
- C. Monitor women’s employment by classification and occupational grouping if required.
- D. Conduct training on gender-based analysis for key managers.

- E. Promote the use of gender sensitive language in all external and internal communications.
- F. Collect and use gender disaggregated information to guide initiatives aimed at the advancement of women’s employment initiatives in non-traditional occupations.
- G. Work with both government and private agencies and organizations to make women aware of employment opportunities.

All employees of the Company and contractors hired to support engineering, construction and project management activities related to the exploration program have a role to play in implementing the Company’s Human Resources policies and programs, including those aimed at increasing the overall level of participation by women in non-traditional occupations.

Within the operations team all employees are expected to support these objectives by actively discouraging gender insensitive behavior and language; treating all individuals with respect; and co-operating with managers by participating in activities designed to increase awareness of gender sensitivity. In addition to the responsibilities of all employees, managers will be held accountable to ensure that all staff within their team are aware of the women’s employment objectives and all training activities associated with the objectives; and dealing with issues related to gender sensitivity as appropriate.

## **2.0 Recruitment and Employment**

New Found Gold values are in line with provincial, national and industry codes of business conduct and mineral exploration, which focuses on economic prosperity, social well-being, environmental stewardship, and corporate governance. The exploration company is continually developing specific policies, strategies and standards that apply to its business activities but does take extensive guidance from those that have been developed by mineral exploration associations including the Prospectors and Developers Association of Canada (PDAC), the Professional Engineers and Geoscientists of Newfoundland and Labrador (PEGNL), the governments of Newfoundland and Labrador, the Federal Government, and a host of related businesses and partners. Like occupational Health and Safety, the goal is to provide a safe and healthy work environment for all its employees.

Typical recruitment and employment will occur following a review of resumes collected after publishing job positions via websites such as indeed.com and through local media. Resumes are kept on file and reviewed regularly once a position to be filled is identified. Interviews are conducted of potential hires and a decision is made once a suitable candidate is identified. At the start of each employment a new hire is subjected to an orientation and if needed training.

### **2.1 Women’s Employment Plan**

New Found Gold is aware that women have been traditionally underrepresented in mineral exploration, and that when they are given the right training, opportunities, and support they can make a significant contribution to the exploration program. Nonetheless, companies need to be cognizant of the barriers

that women face in natural resource industries and to make provisions that increase awareness of women’s capabilities and accommodate their needs. NFG’s efforts have resulted in a high percentage of Women employees overall and the advancement of women in management and non-traditional areas of work is ongoing.

NFG will make every effort to reach and maintain a minimum Women employment target at the Queensway Project, and work with contractors to achieve this result (Table 2). With current numbers and anticipated requirements moving forward these numbers are expected to be well maintained and even exceeded.

Female Employment	Objective
Trades and Labour	5%
Project Support	5%
Professional and Technical	10%
Project Management	5%
<b>Total Employment</b>	<b>5-10%</b>

*Table 2. New Found Gold Corp’s Women’s Employment Targets for the Queensway Project.*

Women employees have been encouraged to join associations related to their fields of training and where it is advantageous join professional associations. All crew members are required to participate in company sponsored First Aid, Safety, and other training as they become available.

## 2.2 Contractor Responsibilities

Diversity is important to NFG and primary contractors will be required to adhere to the conditions outlined in the Women’s Employment Plan, where ever they can. It must be understood however that some contracts are not typically targeted by women workers and as such no employment numbers can reasonably be suggested. This would include positions at drill rigs where women’s employment is typically zero.

## 3.0 Communication

To support NFG’s women’s employment objectives and initiatives, as outlined throughout this plan, The Company will develop and utilize the following tools as part of its communications strategy.

- A. Conduct visits with local municipalities and Development Corporations to outline the proposed exploration programs and promote employment opportunities within mineral exploration.
- B. Promote the achievements of the company’s women employees on the webpage and through media. Enlist our women technical staff to speak at conferences and other venues to promote our exploration activities.
- C. Assist our women employees in working with local women’s associations and related professional associations.
- D. Promote and reinforce NFG’s women’s employment in media interviews and presentations.

- E. Reach out to our staff and women’s organizations regularly to see how our initiatives can be improved.
- F. Sponsor programs that are designed to promote women’s employment, training, and achievements.

## **4.0 Reporting, Monitoring and Review**

During the initial stages of the exploration program, plans around women’s employment will be developed as needed and a project management reporting system will be utilized whereby all companies hired to support the Queensway Project will report regularly to the Company. The Company will then compile this information and conduct reviews to recognize where change is required, and actions needed. These initial reports provide data on employment on all facets of the project, including a breakdown by gender and job category. The Company will continue to use this project management reporting system to report on the objectives of this plan, including those initiatives aimed specifically at supporting the employment of women. The Company will continue its periodic consultation with the Office for the Status of Women who can provide some guidance when required.

The Company has numerous commitments that it is expected to deliver on over the life of the project. To ensure that the Company can monitor its performance on meeting these commitments regular notes on progress will be compiled by key staff people for review.

The Company will also review the women’s employment objectives annually and revise them as needed. This review process will incorporate input from senior management, human resources staff, employee advisory committees, and, where appropriate, external stakeholders. The Company will conduct an annual meeting with stakeholders to review progress on the Women’s Employment Plan, obtain feedback from such stakeholders and review best practices around the advancement of women in underrepresented occupations.

To summarize, the Company will implement the following initiatives to monitor its women’s employment objectives:

- A. Designate several staff members with collecting and compiling information and notes on women’s employment and related meetings.
- B. Conduct regular and annual reviews of the company’s women’s employment initiatives.
- C. Annually review the status of all strategies identified in the Women’s Employment Plan.

# TRAINING REPORT – LAND BASE SPILL RESPONSE TRAINING

## NEW FOUND GOLD CORP. – GANDER, NEWFOUNDLAND LABRADOR

TRAINING DATES | 22-23 August 2023



# NEWFOUND GOLD CORP

August 2023



Environmental  
Emergencies



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# 1 INTRODUCTION

The Land Base Spill Response Training course took place over two days, from Tuesday, August 22<sup>nd</sup> to Wednesday, August 23<sup>rd</sup>, 2023. The training was held at the main office of New Found Gold Corp. (NFGC) in Gander and at the core yard in Appleton, NL. The objectives of the training sessions were to ensure that NFGC personnel understood the contents of their Emergency Spill Response Plan, including their own roles and responsibilities, and to gain basic knowledge of the different types of land-based response tactics to deploy on-site in the event of a spill. This training was provided by Triox Environmental Emergencies (TRIOX).

# 2 PARTICIPANTS

**Table 1 : Participants**

Name	Organization
Wally Skiffington	Guntew
Peter Tarrant	Guntew
Nick Whitehorne	New Found Gold Corp
Greg Gillingham	New Found Gold Corp
Kevin Keats	New Found Gold Corp
Jason Richardson	Rally Drilling
Hilary Keats	New Found Gold Corp
Abigail Amo	New Found Gold Corp
Ben Gillingham	New Found Gold Corp
Nick Hosek	New Found Gold Corp

### 3 TRAINING AGENDA

Table 2: Day 1, August 22<sup>nd</sup>

<i>Times</i>	<i>Subject</i>	<i>Description</i>
9:00	<b>Welcoming remarks</b>	<ul style="list-style-type: none"> <li>• Housekeeping</li> <li>• Introductions</li> <li>• Participants Feedback</li> </ul>
9:15	<b>Introduction</b>	<ul style="list-style-type: none"> <li>• Course objectives</li> <li>• Review Policies &amp; Plans</li> <li>• Hazardous products</li> <li>• Risk locations</li> <li>• Spill movement &amp; migration</li> <li>• Legislation</li> </ul>
9:45	<b>Roles and Responsibilities</b>	<ul style="list-style-type: none"> <li>• Roles &amp; responsibilities</li> <li>• Activation</li> <li>• Response goals</li> <li>• Cleanup resources</li> <li>• Public Relation</li> <li>• Reporting</li> </ul>
10:30	<b>Coffee Break</b>	
10:45	<b>Spill Assessment &amp; Response Techniques</b>	<ul style="list-style-type: none"> <li>• Oil properties</li> <li>• Oil Fate &amp; Behaviour</li> <li>• Effects of winter conditions on oil behaviour and weathering</li> <li>• Hazards</li> <li>• Land, water &amp; winter tactics overview</li> <li>• Personnel Safety &amp; PPE</li> <li>• Response strategies</li> <li>• Decontamination</li> <li>• Waste management</li> </ul>
12:30	<b>Lunch</b>	
13:30	<b>Tabletop Exercise</b>	
16:30	<b>Closing remarks</b>	<ul style="list-style-type: none"> <li>• Questions, Comment</li> </ul>
17:00	<b>End of Day</b>	

Table 3: Day 2, August 23<sup>rd</sup>

Times	Subject	Description
9:00	Welcoming remarks	<ul style="list-style-type: none"> <li>• Housekeeping</li> <li>• Agenda</li> <li>• Instructions</li> </ul>
9:15	Job Safety Analysis	<ul style="list-style-type: none"> <li>• Hazards analysis</li> <li>• Mitigation procedures</li> </ul>
9:30	Field Exercise	<ul style="list-style-type: none"> <li>• Underflow Dam Tactic</li> <li>• Inverted Weir</li> <li>• Sewer Drain</li> </ul>
12:30	Lunch	
13:30	Field Exercise	<ul style="list-style-type: none"> <li>• Absorbent</li> <li>• Culvert Bloc Tactic</li> <li>• Filter fence</li> </ul>
16:30	Closing remarks	<ul style="list-style-type: none"> <li>• Questions, Comment</li> </ul>
17:00	End of Day	

## 4 RECOMMENDATIONS

Based on observations from TRIOX, certain recommendations were made during the visit that identify potential areas for improvement:

- Additional material to build the tactics should be purchased to increase the response capacity of NFGC.
- Personal protection equipment such as rubber gloves and chemical suits should be purchased and included in the spill kits to protect the workers in the event of a spill.
- It is recommended to invest in a dedicated storage container where all the spill response materials and personal protective equipment (PPE) can be kept together. This will ensure that everything is easily accessible and known by all workers on site.
- Recommend adding the Emergency Response Guidebook to all the spill kits and making them readily available to all NFGC personnel (1800-327-6868 or at [www.jjkeller.com](http://www.jjkeller.com)).
- Recommend developing a first responder checklist to guide the first responder with the actions to take in the event of a spill.

## 5 CONCLUSION

Triox Environmental Emergencies extends its sincerest appreciation to New Found Gold Corp. for the opportunity to conduct a highly successful training session.

The training session was designed to equip NFGC employees with essential skills and knowledge to excel in their respective roles. The collaboration between our two organizations was marked by professionalism, enthusiasm, and a shared commitment to fostering growth and development.

During the interactive training session, participants engaged in dynamic discussions, practical exercises, and simulations that aimed to enhance their expertise in Land Base spill response. Our team delivered comprehensive content that catered specifically to the unique needs and objectives of NFGC.

We would like to express our heartfelt gratitude for entrusting us with this training opportunity. It was a pleasure working with such an engaged and motivated group of individuals. We are confident that the knowledge gained during this session will have a positive impact on the spill response effectiveness and contribute to the overall success of the company.

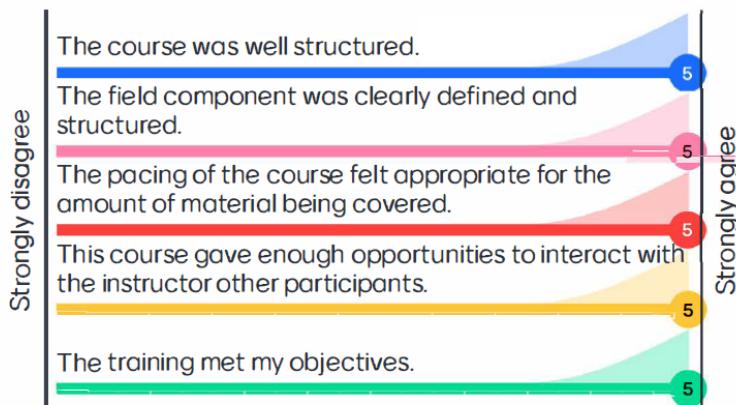


Dave Champagne

Triox Environmental Emergencies

## 6 COURSE FEEDBACK

### Evaluate the Course Structure



#### One thing that could be improved for next time?

8 Responses

Awesome thanks	Nothing	Nothing
I believe it met my objectives	Nothing	Everything went well and all my questions were answered
Great course	Everything was good. Thank you	

## One thing that was good about the course

10 Responses

Very hands on and interactive!	Everything	Hard on part was good
All good	Hands on with our own site and we covered real life scenarios with problems we face.	Informal
Instructor engagement. Demonstrations were amazing.	The course covered the spill plan and procedures for cleaning spill. It was great to know there's a spill dictionary for checking spills and how to proceed for site safety	
Nothing needs to change. Dave was well informed and taught the course excellent.		It was great

## 7 PHOTOS



Figure 1 - Culvert Blocking



Figure 2 – Inverted Weir



Figure 3 - Underflow Dam