



## 9.0 COMMITMENT REGISTRY

Treasury has made a series of the key commitments as identified in the EIS report in accordance to the Federal EIS guidelines (Table 9.0.1). Reference numbers have been attached to commitments as they appear in the report. Regulatory and legislative requirements have been identified where applicable.

Additional commitments may be identified within the EA process, and through engagement with Federal, Provincial governments, Aboriginal communities, and public stakeholders. Commitments currently identified include:

- Additional studies to be carried out;
- Monitoring;
- Aboriginal and Public consultation; and
- Implementation of Health and Safety policies and Environmental Procedures.

**Table 9.0.1 Treasury Commitments for the Project**

Commitment	Timing
Treasury will continue to document all comments, issues, or concerns raised by stakeholder groups. All input Treasury receives will be duly considered and acted upon according to the nature of the input received.	Pre-development → Post-closure
Treasury will follow CEEA protocols in distributing the EIS document for review, including posting for Notice of Public Information Events for Project updates to stakeholder groups.	Pre-development → Post-closure as required
Treasury will maintain a local hiring policy, including First Nation communities. The application of this policy is dependent upon the skills and workforce being available locally.	Pre-development → Post-closure
Treasury will maintain, where applicable, a local purchasing policy to purchase goods and services from local suppliers. This policy has the expectation that goods and services will be purchased locally assuming price, delivery and service is competitive with outside suppliers.	Pre-development → Post-closure
Treasury will maintain an active safety program aimed at protecting worker safety ensured by meeting applicable occupational health and safety legislation standards, as well as utilizing other best practices. Employee involvement will be a cornerstone of the safety plans, policies and programs.	Pre-development → Post-closure
All workers and visitors will receive an orientation and safety training prior to conducting work on site. This will include a health and safety overview.	Pre-development → Post-closure



**Table 9.0.1 Treasury Commitments for the Project**

<b>Commitment</b>	<b>Timing</b>
All health and safety policies and procedures will be reviewed annually.	Pre-development → Post-closure
Emergency response procedures will be established. All incidents will be reported as per the applicable standards set with the health and safety policies and procedures.	Pre-development → Post-closure
All vehicles will maintain an emergency kit including communication equipment, first aid kit, and a fire extinguisher where appropriate.	Pre-development → Post-closure
All chemical used at the site will have a Material Safety Data Sheet (MSDS) for safe use, relevant regulatory and safety requirements in place and PPE available for use at all times.	Pre-development → Post-closure
All buildings will meet fire protection requirements and codes. Fire drills will occur on a regularly scheduled basis. All new workers, contractors and visitors will receive a safety orientation which will include a fire response training	Pre-development → Post-closure
Treasury will continue to engage with Aboriginal communities and groups through the life of the project.	Pre-development → Post-closure
Ditching and drainage will be designed to collect and manage runoff from site, and will be established around stockpiles. All collection ponds will be integrated with the site water management plan.	Construction → Post-closure
All chemicals on site will be stored according to government regulations and industry best practices. Spill protection systems will be designed according to industry best practices.	Construction → Post-closure
All chemical spills within the processing plant, or chemical storage areas will be controlled through provision of secondary containment as appropriate. Spills of potentially hazardous materials during transport, or from on-site material storage and handling facilities will be managed. Measure will be taken to prevent and clean up any hydrocarbon spills (and other spills) at source to ensure such materials do not enter the surrounding natural environment where practical.	Pre-development → Post-closure
In the event of a spill, it will be reported according to Ministry of Environment and Climate Change (MOECC) protocols.	Pre-development → Post-closure



**Table 9.0.1 Treasury Commitments for the Project**

Commitment	Timing
<p>Best management practices for dust control will be implemented. A plan will be prepared to identify all potential sources of dusts, outline mitigation methods to employ, and detail all records and inspections required by regulatory officials. Treasury will monitor air emissions through implementation of current industry standards to meet regulatory requirements (Ontario Reg. 419/05, AAQC, MOECC).</p>	<p>Construction → Post-closure</p>
<p>Treasury will design the operation to meet noise emission regulatory requirements (NPC-103, MOECC)</p>	<p>Construction → Post-closure</p>
<p>Treasury will consult local stakeholders throughout Project life to ensure the Company is aware of general or specific concerns the public may have. A formal public complaint logging and feedback system will be implemented when plant construction commences. This system will be in place for the life of the mine.</p>	<p>Pre-development → Post-closure</p>
<p>Dangerous wildlife awareness will be part of the site's safety program. Safety training will be provided to workers to raise awareness and to assist in protecting them from injury. Food waste will be managed in a manner that limits contact/attraction of potentially dangerous wildlife.</p>	<p>Construction → Post-closure</p>
<p>Road-killed animals or any other carcasses found on-site will be removed in a timely and legal manner to limit the attraction of wildlife.</p>	<p>Construction → Post-closure</p>
<p>Tailings Storage Facility (TSF) will be constructed to meet all regulatory requirements and industry best practices standards as described within the Provincial <i>Lake and Rivers Improvement Act</i>. TSF will be designed and constructed to withstand the probable maximum flood and maximum credible earthquake. A remedial action plan will be developed as part of the emergency management plan, and environmental management plan with appropriate government agencies, in the event of a dam breach.</p>	<p>Construction → Operations</p>
<p>Groundwater monitoring wells will be installed across Project site (as described in Section 13 and Appendix M).</p>	<p>Construction → Post-closure</p>
<p>Environmental monitoring will be conducted in accordance with standard practice and regulatory requirements, including any site –specific environmental approvals (<i>Water Resources Act (Section 34, Section 53)</i>, PWQG, ODWS, NPC-103, and NPC-119).</p>	<p>Construction → Post-closure</p>



**Table 9.0.1 Treasury Commitments for the Project**

Commitment	Timing
A blasting schedule and plan will be developed to notify the public when blasting will occur and to describe all blasting activities on site. This plan will be developed through consultation with local stakeholders and regulatory officials.	Operations
All personnel who handle explosive will be checked to ensure they have the required certified training. All unauthorized or non-essential personnel will be restricted from access to blasting sites, and storage facilities.	Operations
Operational procedures for all unit operations and jobs will be implemented to ensure worker safety and prevent operational upsets and equipment failure due to improper use, Accountability systems will be in place to deal with procedural violations. All operational procedures will be reviewed annually.	Construction → Post-closure
All operational and maintenance procedures will be reviewed annually and revised if required to reflect changes that may have occurred.	Construction → Post-closure
A “progressive or change management” system will be implemented to ensure that any material changes to operations, maintenance or engineering go through a formal review process to ensure that the possibility of injury, environmental incidents, equipment damage and production interruptions are minimized to the greatest extent possible.	Construction → Post-closure
<p>A list of environmental management plan commitments made during the environmental assessment process will be maintained indicating:</p> <ul style="list-style-type: none"> <li>- The nature of the commitment;</li> <li>- To whom (e.g., public, agency) the commitment was made, if specific;</li> <li>- Whether the commitment is addressed or linked to a regulatory instrument such as regulation or environmental approval;</li> <li>- Any applicable timeline associated if any;</li> <li>- Status of the commitment; and</li> <li>- Additional actions required to fulfill the commitment.</li> </ul>	Construction → Post-closure
Environmental aspects and potential impacts of the project will be managed within an environmental management plan (EMP) which integrates environmental performance with overall project management.	Construction → Post-closure



**Table 9.0.1 Treasury Commitments for the Project**

<b>Commitment</b>	<b>Timing</b>
Implementation and maintenance of the EMP will be driven by Treasury commitment to environmental compliance and regulatory needs. Workers will be educated on Treasury's commitment to environmental excellence and environmental policies.	Construction → Post-closure
EMP will be reviewed annually using an precautionary and progressive approach considering changing circumstances which could affect the suitability of monitoring and effectiveness of the goals of the EMP.	Construction → Post-closure



**Table 9.0.1 Treasury Commitments for the Project**

Commitment	Timing																																																																											
<p>All water discharged to the environment will meet the listed parameters for PWQO. Where there is no PWQO for a parameter, the commitment will be to meet the CCME value. For mercury, the commitment will be to meet background concentrations. Detailed parameters will be determined through engagement with appropriate Provincial and Federal regulatory bodies.</p>	<p>Operations → Post-closure</p>																																																																											
<table border="1"> <thead> <tr> <th data-bbox="201 569 407 646">Analyte</th> <th data-bbox="407 569 597 646">Effluent (mg/L)</th> <th data-bbox="597 569 813 646">Source</th> </tr> </thead> <tbody> <tr><td>Aluminum</td><td>0.075000</td><td>PWQO<sup>1</sup></td></tr> <tr><td>Antimony</td><td>0.020000</td><td>PWQO</td></tr> <tr><td>Arsenic</td><td>0.100000</td><td>PWQO</td></tr> <tr><td>Beryllium</td><td>0.011000</td><td>PWQO</td></tr> <tr><td>Boron (total)</td><td>0.200000</td><td>PWQO</td></tr> <tr><td>Cadmium</td><td>0.000200</td><td>PWQO</td></tr> <tr><td>Chloride</td><td>120.000000</td><td>CCME<sup>2</sup></td></tr> <tr><td>Chromium</td><td>0.100000</td><td>PWQO</td></tr> <tr><td>Cobalt</td><td>0.000600</td><td>PWQO</td></tr> <tr><td>Copper</td><td>0.005000</td><td>PWQO</td></tr> <tr><td>Cyanide</td><td>0.005000</td><td>PWQO</td></tr> <tr><td>Iron</td><td>0.300000</td><td>PWQO</td></tr> <tr><td>Lead</td><td>0.005000</td><td>PWQO</td></tr> <tr><td>Mercury</td><td>0.000020</td><td>Background<sup>3</sup></td></tr> <tr><td>Molybdenum</td><td>0.010000</td><td>PWQO</td></tr> <tr><td>Nickel</td><td>0.025000</td><td>PWQO</td></tr> <tr><td>Nitrate</td><td>13.000000</td><td>CCME</td></tr> <tr><td>Phosphorus</td><td>0.030000</td><td>PWQO</td></tr> <tr><td>Selenium</td><td>0.100000</td><td>PWQO</td></tr> <tr><td>Silver</td><td>0.000100</td><td>PWQO</td></tr> <tr><td>Thallium</td><td>0.000300</td><td>PWQO</td></tr> <tr><td>Uranium</td><td>0.005000</td><td>PWQO</td></tr> <tr><td>Vanadium</td><td>0.007000</td><td>PWQO</td></tr> <tr><td>Zinc</td><td>0.030000</td><td>PWQO</td></tr> </tbody> </table>		Analyte	Effluent (mg/L)	Source	Aluminum	0.075000	PWQO <sup>1</sup>	Antimony	0.020000	PWQO	Arsenic	0.100000	PWQO	Beryllium	0.011000	PWQO	Boron (total)	0.200000	PWQO	Cadmium	0.000200	PWQO	Chloride	120.000000	CCME <sup>2</sup>	Chromium	0.100000	PWQO	Cobalt	0.000600	PWQO	Copper	0.005000	PWQO	Cyanide	0.005000	PWQO	Iron	0.300000	PWQO	Lead	0.005000	PWQO	Mercury	0.000020	Background <sup>3</sup>	Molybdenum	0.010000	PWQO	Nickel	0.025000	PWQO	Nitrate	13.000000	CCME	Phosphorus	0.030000	PWQO	Selenium	0.100000	PWQO	Silver	0.000100	PWQO	Thallium	0.000300	PWQO	Uranium	0.005000	PWQO	Vanadium	0.007000	PWQO	Zinc	0.030000	PWQO
Analyte		Effluent (mg/L)	Source																																																																									
Aluminum		0.075000	PWQO <sup>1</sup>																																																																									
Antimony		0.020000	PWQO																																																																									
Arsenic		0.100000	PWQO																																																																									
Beryllium		0.011000	PWQO																																																																									
Boron (total)		0.200000	PWQO																																																																									
Cadmium		0.000200	PWQO																																																																									
Chloride		120.000000	CCME <sup>2</sup>																																																																									
Chromium		0.100000	PWQO																																																																									
Cobalt		0.000600	PWQO																																																																									
Copper		0.005000	PWQO																																																																									
Cyanide		0.005000	PWQO																																																																									
Iron		0.300000	PWQO																																																																									
Lead		0.005000	PWQO																																																																									
Mercury		0.000020	Background <sup>3</sup>																																																																									
Molybdenum		0.010000	PWQO																																																																									
Nickel		0.025000	PWQO																																																																									
Nitrate		13.000000	CCME																																																																									
Phosphorus		0.030000	PWQO																																																																									
Selenium		0.100000	PWQO																																																																									
Silver		0.000100	PWQO																																																																									
Thallium		0.000300	PWQO																																																																									
Uranium		0.005000	PWQO																																																																									
Vanadium		0.007000	PWQO																																																																									
Zinc		0.030000	PWQO																																																																									
<p><sup>1</sup> Provincial Water Quality Objectives</p>																																																																												
<p><sup>2</sup> CCME: Water Quality Guidelines for the Protection of Aquatic Life</p>																																																																												
<p><sup>3</sup> Blackwater Creek</p>																																																																												



**Table 9.0.1 Treasury Commitments for the Project**

Commitment	Timing
All final effluent and air discharge points will have control structures to immediately cease discharge if and when necessary.	Operations and maintenance
All effluent and air discharge points will be sampled and results reported to the appropriate authorities in accordance with environmental permit requirements.	Operations and maintenance
Progressive reclamation of mine waste rock area will be undertaken, where practical, once maximum height has been reached.	Closure → Post-closure
The site will be reclaimed and the land restored to a naturalized state per the mine closure plan approved by the Ministry of Northern Development and Mines	Closure → Post-closure