

August 16, 2017

Project No. 1669326-4000

NIMOS

Lachmonstraat 100
Paramaribo
Suriname

COMMENTS FROM NIMOS'S REVIEW OF THE DRAFT SCOPING REPORT AND TERMS OF REFERENCE OF THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT STUDY OF THE SABAJO EXPANSION OF THE MERIAN GOLD MINE

Dear Sir or Madam

On June 20, 2017 Newmont received the comments from NIMOS's review of the Draft Scoping Report and Terms of Reference of the Environmental and Social Impact Assessment Study of the Sabajo Expansion of the Merian Gold Mine. These comments have been addressed in the attached revised Scoping Document as set out in the following table. The responses from Newmont and Golder Associates are provided in bold Text.

Sincerely,

GOLDER ASSOCIATES LTD.



Gregory Jones
Environmental Assessment Specialist

GJ/crm

CC: Cynthia Parnow
Matt King



Page	Subject	Comment
<p>General:</p> <ul style="list-style-type: none"> • For the layout of the document it is advisable that each new chapter should begin on a new page. Corrected • Please include only the relevant stakeholders, legislation and conventions etc. for this project. Corrected; relevance of legislation has been described in Table 3-1; relevant stakeholder communities identified in Table 7-1. • Also discuss the relevance of each stakeholder, legislation and convention and how you will make sure to apply the legislation and conventions in this project. Corrected on page 12-29 of the document • Please also include a closure and rehabilitation section in this document Corrected on page 11 of the document • Please be consistent in: <ul style="list-style-type: none"> - The use of the official name of the conventions. - The use of the correct publication references and the most recent amendments of the legislation. - The use of the official name and the correct translation of the name of the acts in the document. For example: ‘Government Decree on Mining Installations S.B. 1989 no.38’ should be ‘Besluit Mijnbouw – installaties S.B. 1989 No.38 (State Decision on Mining Installations S.B. 1989 No.38). - The use of the official citation method for Surinamese legislation: (e.g. [Name of Act], [original publication reference], if there is an amendment [z.l.g. bij [publication reference]]. The official publication reference for Surinamese legislation is: S.B. or G.B. [year of publication], [no. of publication]. For example: ‘Grondwet van de Republiek Suriname S.B. 1987 no.116 z.l.g bij S.B. 1992 no.38 (The Constitution of the Republic of Suriname S.B. 1987 no. 116 as amended by S.B. 1992 no. 38)’. Apply this notation for all acts in the document. Corrected on pages 12- 29 of the document 		

Page	Subject	Comment	Response
1.0 Introduction			
1	This document is provided to the National Institute of Environment and Development (NIMOS)	It should be the National Institute of Environment and Development in Suriname	Corrected Page 1
3	Table 1-1: ESIA Core Team <ul style="list-style-type: none"> • <u>Kitie</u> Algoe 	It should be Kirtie.	Corrected Page 3
6	2.1 Project Location and Access <ul style="list-style-type: none"> • The area has also been accessed by mainly foreign logging companies. 	Were these logging companies working in the context of the current Sabajo project or were they working privately?	The logging trucks are working privately Corrected on Page 7
7	2.3 Sabajo Mine Site Project Components <ul style="list-style-type: none"> • The largest pit is expected to be approximately 270 meters below ground surface (<u>m bgs</u>) with a surface area of approximately 55 hectares (ha) of which approximately 36 ha is already disturbed by SSM. Ore will be stockpiled at the ore storage area and transported to Merian via the <u>transportation corridor using 100-150 ton trucks.</u> 	What will be the frequency of the transportation on daily basis and how many trucks will be deployed to transport the ore?	This is still being determined as part of the economic assessment. This information will be included in the ESIA and the impacts will be developed based on a traffic range (see page 8)
7	2.3 Sabajo Mine Site Project Components <ul style="list-style-type: none"> • <u>Based on preliminary geochemical analyses</u>, it is anticipated that the waste rock will be inert and not generate acid drainage. 	Were these preliminary geochemical analyses conducted in the Sabajo area?	Yes the tests were conducted in the Sabajo area (see page 8)
7	2.4 Sabajo-Merian Haul Road <ul style="list-style-type: none"> • The three routes under consideration are shown in Figure 2-3. 	The reference to figure 2-2 and figure 2-3 is switched.	Corrected

Page	Subject	Comment	Response
2.0 Project Description			
3.0 Legal and Regulatory Framework and Corporate Standards			
11	3.2 Legal Framework	<ul style="list-style-type: none"> • ‘The Hindrance Act (Hinderwet, 1930, 1944, and 1972)’ should be ‘Hinderwet 1930 G.B. 1930 no. 64 z.l.g. bij SB. 2001 no. 63 (Nuisance act G.B. 1930 no. 64 as amended by SB. 2001 no. 63)’ • ‘The Nature Conservation Act (Natuurbeschermingswet, 1954)’ should be ‘Natuurbeschermingswet 1954, G.B. 1954 no. 26 z.l.g. bij S.B. 1992 no. 80 (Nature Conservation Act 1954, G.B. 1954 no. 26 as amended by S.B. 1992 no. 80)’ • ‘The Forest Management Act (Wet Bosbeheer 1992)’ should be ‘Wet Bosbeheer S.B. 1992 no. 80 (The Forest Management Act S.B. 1992 no. 80)’ • ‘The Timber Act of 1947’ should be ‘Houtwet 1947 G.B. 1947 no.42 (Timber Act 1947 G.B. 1947 no.42)’ 	Corrected Pages 12-29
12	NIMOS published the draft Guidelines for Environmental Assessment (2009) (including social aspects) in Suriname and project developers are expected to comply with the spirit of the guidelines.	The Guidelines are not Draft. They are Final.	Noted, Corrected Page 14

Page	Subject	Comment	Response
13-21		<ul style="list-style-type: none"> • Table 3-1: Legal Framework(a) for National Environmental and Social Management in Suriname: <ul style="list-style-type: none"> - All Legislation mentioned in this table should be reviewed and corrected on the following aspects: official name and translation of the name, publication references and the most recent amendments, official citation method and the relevance for the project. - ‘Law on Territorial Sea and the Contiguous Economic Zone (1978 S.B.1978 No. 26)’ is mentioned. The official name is: ‘Wet van 14 april 1978 houdende uitbreiding van de territoriale zee van de Republiek Suriname en de instelling van de daaraan grenzende economische zone S.B. 1978 no. 26 (Law Containing the Extension of the Territorial Sea of the Republic of Suriname and the Establishment of a Contiguous Economic Zone S.B.1978 no.26), it has been withdrawn by the act ‘Wet Maritieme zones S.B. 2017 no. 41 (Maritime zones act S.B. 2017 no. 41). This should be corrected in the document. 	Corrected pages 15-26
22	3.3 Regulatory Framework In Suriname	<ul style="list-style-type: none"> • In alinea 3 the current position of NIMOS is not fully described. Please correct this in the document. • The Ministry of Labor Technological Development and Environment’ is mentioned. The name and responsibilities of this Ministry have been revised by State Decree of 2015 (S.B. 2015 no. 41). Please correct this in the document where necessary. 	Corrected Page 24

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24	3.4 International Standards and Guidelines	<ul style="list-style-type: none"> Why are the IFC Environmental Performance Standards and EHS Guidelines not included in table 3.4? 	<p>Table 3.4 has been deleted. In the Merian Mineral Agreement, it states that Newmont will comply with the IFC EHS and mining guidelines for Merian. The Sabajo Project will also be in compliance with these guidance documents. With respect to the IFC Performance Standards, Newmont has developed its own internal standards that are based on the same principles and comparable to the IFC standards. These standards may be found on our website at: http://www.newmont.com/about-us/governance-and-ethics/policies-and-standards/default.aspx</p>
4.0 Environmental and Social Impact Assessment Purpose and Process			
30	4.2.1: In accordance with NIMOS guidelines for screening projects, any non-metallic mining project that will affect greater than 20 hectares of land is a Category A project for which a comprehensive environmental assessment (ESIA, in this case) is mandatory.	<ul style="list-style-type: none"> This is a gold mining project which is a metallic mining project. It is considered a Category A project because the future Right of Exploitation Area is expected to be above 10.000 ha 	Corrected Page 29
5.0 Preliminary list of issues			
34	Cumulative impacts from other projects (e.g. effects of the Project combined with logging and Small scale mining)	<ul style="list-style-type: none"> Also take into consideration that the planned haul road can have as a negative impact that the small scale gold miners can have easier access to the area 	Corrected Page 33
34	Historic Sabajo baseline studies, which includes data collected on surface water and groundwater water quality reports and climate	<ul style="list-style-type: none"> Who had done this study and in which year is it conducted? 	Corrected Page 33
7.0 ESIA Scope of Work			
42	7.2.1 Framework for Social Data Collection <ul style="list-style-type: none"> Layer 3: Demographic (L3) Methods/instruments: Surveys/questionnaires broad-based/statistical sampling household-level surveys 	<ul style="list-style-type: none"> Will each household in the AOI be surveyed? 	Clarification is provided on Page 47

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44	7.2.1.1 Examples Layer 1: Physical <ul style="list-style-type: none"> Where in the AOI are SSM activities are taking place? 	<ul style="list-style-type: none"> Typo. 	Corrected Page 44
50	7.3.1 Environmental Specialist Study 1: Groundwater Study <ul style="list-style-type: none"> Groundwater quality samples will be collected quarterly and analyzed by a laboratory for a comprehensive parameter suite including major ions, metals, and nutrients. 	<ul style="list-style-type: none"> How many samples will be taken quarterly? Is this laboratory already identified? 	<p>Approximately 5 groundwater samples will be collected quarterly dependent on accessibility. Due to road conditions, it will not always be possible to collect samples from all of the installed groundwater wells. Figure 2.2 shows the locations of the wells that are in the current groundwater monitoring program.</p> <p>The laboratory has been identified and is environmentally certified; edit on page 51.</p>
52	7.3.4 Environmental Specialist Study 4: Air Quality and Climate <ul style="list-style-type: none"> Data will be collected during the long dry season (September and October), which should provide a reasonable estimate of worst case conditions. 	<ul style="list-style-type: none"> Why will data be collected only during the long dry season and not the rainy season? 	Data will be collected in both the wet and the dry season, although the dry season will be indicative of the most conservative baseline conditions with respect to dust generation and the associated impact assessment that will be modeled.
53	7.3.6 Environmental Specialist Study 5: Flora Studies <ul style="list-style-type: none"> A more detailed description of the methodology to be used for the flora studies is included in Appendix C. 	<ul style="list-style-type: none"> Typo. Please correct this. The same is also applicable for section 7.37 and section 7.3.8.1 	Corrected on pages 53 and 54
57	<i>7.4.3.1 Criteria to Evaluate Consequence</i>	<ul style="list-style-type: none"> Please define the criteria for duration, geographic extent, magnitude and consequence 	Criteria for consequence ratings are as defined in Table 7-2. Other criteria are defined as described on page 58.