

Management Plan

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Accidents and Malfunctions Indigenous
Communication Plan

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REVISION LOG

Version	Date Issued	Revision Notes*	Page(s)
1.0	August 21, 2024	The Communications Plan has been removed from the Appendix of the AMPRP and is now a separate document.	All
		Company name change to Calibre Mining Corporation (Calibre) and Project name change to Valentine Gold Mine	Throughout the document
		Company logo change to Calibre Valentine Gold Mine	All Pages
		Consolidation of information under a new section heading Notification Process (Section 4.0)	3 - 11

Notes:

* Revisions in the document are denoted by a vertical line to the right of the change (e.g., paragraph).

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Abbreviations

AMPRP	Accidents and Malfunctions Prevention and Response Plan
Calibre	Calibre Mining Corporation
CLO	Community Liaison Officer
EA	Environmental Assessment
ECCC	Environment and Climate Change Canada
EIS	Environmental Impact Statement
EPP	Environmental Protection Plan
IAAC	Impact Assessment Agency of Canada
IG	Indigenous group
L	Litres
Marathon	Marathon Gold Corporation
MFN	Miawpukek First Nation
MM	Mine Manager
NL	Newfoundland and Labrador
NLDECC	Newfoundland and Labrador Department of Environment and Climate Change
Plan	Accidents and Malfunctions Indigenous Communication Plan
Qalipu	Qalipu Mi'kmaq First Nation
VGM	Valentine Gold Mine

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1.0 INTRODUCTION

Marathon Gold Corporation (Marathon), submitted an Environmental Impact Statement (EIS; Marathon Gold 2020) for the Valentine Gold Project (the Project) to the Impact Assessment Agency of Canada (IAAC) and the Environmental Assessment (EA) Division of the Newfoundland and Labrador Department of Environment and Climate Change (NLDECC) in 2020. The Project was released from the provincial and federal EA processes, with conditions, on March 17, 2022, and August 24, 2022, respectively. Marathon subsequently proposed a change to the Project, with the addition of the Berry Pit Expansion (the Project Expansion), which includes development of a third open pit (Berry pit) on the site and other associated infrastructure changes. On August 13, 2023, Marathon submitted the Berry Pit Expansion Environmental Registration / Environmental Assessment (Valentine Gold Project) Update (Marathon 2023) to NLDECC and IAAC to satisfy requirements under the provincial and federal Environmental Assessment Regulations and proposed changes to the Designated Project. Following regulatory review and a 30-day public comment period, the provincial Minister of Environment and Climate Change released the Project Expansion from the EA process, subject to conditions of release, on October 27, 2023. Final approval from IAAC for the Berry Pit Expansion was received on July 29, 2024.

It should be noted that on January 24, 2024, Calibre Mining Corporation (Calibre) and Marathon Gold Corporation (Marathon) completed the transaction in which Calibre acquired Marathon and the Valentine Gold Project. Calibre’s Valentine Gold Mine is the reference used through the remainder of the document.

This communication plan was initially Appendix A of the Accidents and Malfunctions Prevention and Response Plan (AMPRP). However, due to the importance of communications with Indigenous groups (IGs), it Calibre’s VGM team decided to make the Indigenous Communication Plan a separate document.

This is a living document that will be reviewed, updated and improved upon throughout the life of the Project.

1.1 PURPOSE

The purpose of the Accidents and Malfunctions Indigenous Communication Plan (Plan) is to ensure timely and transparent communication of accidents and malfunctions to IGs. The Plan has been developed, through engagement with Miawpukek First Nation (MFN) and Qalipu Mi’kmaq First Nation (Qalipu), and details the procedures that Calibre’s Valentine Gold Mine (VGM) will employ to notify MFN and Qalipu upon the occurrence of accidents and malfunctions associated with the Project.

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2.0 REGULATORY SETTING

In accordance with the *Canadian Environmental Assessment Act, 2012* (Section 54), the Minister of Environment issued a Decision Statement and Conditions under subsection 65(1) of the *Impact Assessment Act*. The Plan has been developed by Calibre’s VGM team to meet Conditions 10.5.3 and 10.6 which provide as follows

“Condition 10.5.3: *notify, as soon as possible and pursuant to the communication plan referred to in condition 10.6, Indigenous groups of the accident or malfunction*

Condition 10.6: *The Proponent shall develop, in consultation with Indigenous groups, a communication plan for Designated Project accidents and malfunctions. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:*

- 10.6.1** *the types of accidents and malfunctions requiring the Proponent to notify the Indigenous groups;*
- 10.6.2** *the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunity for the Indigenous groups to assist in the response to the accident or malfunction; and*
- 10.6.3** *the names and contact information of the Proponent and Indigenous group representatives for the purposes of notifying pursuant to condition 10.6.2 and communicating about accidents and malfunctions.”*

3.0 ACCIDENTS AND MALFUNCTIONS TRIGGERING A DUTY OF NOTIFICATION

Accidents and malfunctions are classified as “High”, “Medium” or “Low”. IGs will be notified upon the occurrence of an accident or malfunction presented in the AMPRP, which have been included in Table 3-1.

If a specific accident or malfunction occurs which is not listed but has a similar environmental consequence, IGs (MFN, Qalipu) will be notified in accordance with the notification process (Table 4-1).

Table 3-1 Accidents and Malfunctions Consequence Summary

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Accident or Malfunction	Consequence	Issues of Concern
TMF Malfunction	High	<ul style="list-style-type: none"> • Damage to terrestrial/aquatic habitat and life • Damage to downstream human environment • Human fatality
Vehicle Accident	High	<ul style="list-style-type: none"> • Damage to terrestrial/aquatic habitat and life if a spill occurs • Human fatality
Fuel and Hazardous Materials Spill	Medium	<ul style="list-style-type: none"> • Damage to terrestrial/aquatic habitat and life • Damage to downstream human environment
Fire/Explosion	Medium - High	<ul style="list-style-type: none"> • Damage to terrestrial/aquatic habitat and life if near surface water • Loss of terrestrial habitat if fire is uncontrolled • Potential lost-time injury • Human fatality (high consequence)
Stockpile Slope Failure	Low	<ul style="list-style-type: none"> • Damage to terrestrial/aquatic habitat and life
Unplanned Release of Contact Water	Medium	<ul style="list-style-type: none"> • Damage to aquatic habitat and life • Damage to downstream human environment
Consequence categories are defined as follows: <ol style="list-style-type: none"> 1. High consequence may cause long-term environmental impacts, human fatalities, and/or >\$100k in financial damage/loss. 2. Medium consequence may cause medium-term environmental impacts, lost-time injuries, and/or <\$100k in financial damage/loss. 3. Low consequence may cause short-term environmental impacts, first aid/medical treatment, and/or <\$50k in financial damage/loss. 		

4.0 NOTIFICATION PROCESS AND ENGAGEMENT

Notification information, timelines, and methods are based upon the consequence rating of the accident or malfunction as presented in Table 3-1 .

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4.1 Notification Information

Information provided in the initial notification to IGs will include the following:

- a. Date and location of the accident or malfunction;
- b. Summary description of the event;
- c. Information on the accident or malfunction, including the type and quantity of substance(s) released, the location and duration of the release(s) and potential environmental impacts;
- d. Remedial actions taken in response and those planned to be undertaken and a schedule of implementation of remedial actions;
- e. Resources required and resources available;
- f. Any health advisories for IGs; and
- g. Details of subsequent monitoring related to the accident or malfunction.

Monitoring will be determined through engagement with IGs (including any environmental stewardship committee or similar body established under an agreement with the Indigenous group) and will comply with any regulatory requirements applicable to the specific accident or malfunction. Reporting will be consistent with relevant regulatory requirements and the terms of any agreement concluded between Calibre and an Indigenous group.

4.2 Notification Procedure

Notification timelines and methods (e.g., email, call) will be determined by the consequence rating of the accident or malfunction as set out in Table 3-1 and conducted in accordance with the notification procedures set out in Table 4-1.

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Table 4-1 Accidents and Malfunctions Notification Summary

Consequence Level	Timing of Notification	Notifier	Person(s) Notified	Notification Method
Minimal / Localized¹	Within 30 days	Manager of Stakeholder and Indigenous Relations	Environmental Stewardship Committee ²	Include incident in any periodic report to IGs as required by agreement.
Low	Within 48 hours	Environmental Coordinator or Environmental Superintendent	On-site Indigenous Environmental Technicians	In person communication when technician is on site. Email when technician is off site.



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Consequence Level	Timing of Notification	Notifier	Person(s) Notified	Notification Method
		Environmental Coordinator or Environmental Superintendent	Chief/ Director of Natural Resources (MFN) Chief/ Band Manager/ Director of Environment and Natural Resources (Qalipu)	Initial report by e-mail
		Manager of Stakeholder and Indigenous Relations	Environmental Stewardship Committee ²	Include incident in any periodic report to IGs as required by agreement
		Environmental Coordinator or Environmental Superintendent	Chief/ Director of Natural Resources/CLO (MFN) Chief/ Band Manager/ Director of Environment and Natural Resources (Qalipu)	Copy of any compliance reporting to federal or provincial regulator to be provided concurrently to IGs



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Consequence Level	Timing of Notification	Notifier	Person(s) Notified	Notification Method
		Manager of Stakeholder and Indigenous Relations	Chief/ Director of Natural Resources/CLO (MFN) Chief/ Band Manager/ Director of Environment and Natural Resources (Qalipu)	Include in Annual Report under federal EA Condition 2.10
Medium	Within 24 hours	Environmental Coordinator or Environmental Superintendent	On-site Indigenous Environmental Technicians	In person communication when technician is on site. Email when technician is off site.
		Environmental Coordinator or Environmental Superintendent	Chief/ Director of Natural Resources/CLO (MFN) Chief/ Band Manager/ Director of Environment and Natural Resources (Qalipu)	Phone call or text message Email with read receipt within 24 hours of phone call



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Consequence Level	Timing of Notification	Notifier	Person(s) Notified	Notification Method
		Manager of Stakeholder and Indigenous Relations	Environmental Stewardship Committee	Include incident in any periodic report to IGs as required by agreement
		Environmental Coordinator or Environmental Superintendent	Chief/ Director of Natural Resources/CLO (MFN) Chief/ Band Manager/ Director of Environment and Natural Resources (Qalipu)	Copy of any compliance reporting to federal or provincial regulator to be provided concurrently to IGs
		Manager of Stakeholder and Indigenous Relations	Chief/ Director of Natural Resources/CLO (MFN) Chief/ Band Manager/ Director of Environment and Natural Resources (Qalipu)	Include in Annual Report under federal EA Condition 2.10
High	Immediately	Environmental Coordinator or Environmental Superintendent	On-site Indigenous Environmental Technicians	In person communication when technician is on site. Email when technician is off site.



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Consequence Level	Timing of Notification	Notifier	Person(s) Notified	Notification Method
		Environmental Coordinator or Environmental Superintendent	Chief/ Director of Natural Resources/CLO (MFN) Chief/ Band Manager/ Director of Environment and Natural Resources (Qalipu)	Phone calls Follow-up e-mail with read receipt within 6 hours of phone call
		Environmental Coordinator or Environmental Superintendent	Chief/ Director of Natural Resources (MFN) Chief/ Band Manager/Director of Natural Resources (Qalipu)	Incident specific progress updates as appropriate based on the incident.
		Manager of Stakeholder and Indigenous Relations	Environmental Stewardship Committee	Include incident in any periodic report to IGs as required by agreement



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Consequence Level	Timing of Notification	Notifier	Person(s) Notified	Notification Method
		Environmental Coordinator or Environmental Superintendent	Chief/ Director of Natural Resources (MFN) Chief/ Band Manager/Director of Natural Resources (Qalipu)	Copy of any compliance reporting to federal or provincial regulator to be provided concurrently to IGs
		Manager of Stakeholder and Indigenous Relations	Chief/ Director of Natural Resources (MFN) Chief/ Band Manager/Director of Natural Resources (Qalipu)	Include in Annual Report under federal EA Condition 2.10

¹ Includes fuel spills below the provincial reporting threshold of 70 L.

² If established pursuant to agreement between Calibre and Indigenous groups.

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4.3 Contact Information and Management

Emergency contact information for the IGs for purposes of notification is included in Table 4-2 below.

Note: While this list will be regularly reviewed and updated to ensure accuracy and completeness, the IGs are responsible for notifying Calibre of contact changes to ensure timely notification of the appropriate people, in the event of an accident or malfunction.

Table 4-2 Emergency Contact Information for Notification Purposes

Entity	Contact List	Contact Information
MFN	General Number	709-882-2470
	Chief	General Number Brad Benoit: bbenoit@mfn.gov.ca
	Director of Natural Resources	709-882-3002 Ross Hinks: rhinks@mfn.gov.ca
	Community Liaison Officer (CLO)	General Number Danielle Bungay: dbungay@mfn.gov.ca
Qalipu	General Number (Corner Brook Office)	709-634-0996
Qalipu	Chief	709-634-6895 Jennifer Brake: j.brake@qalipu.ca
	Band Manager	709-634-5111 Charles Pender: cpender@qalipu.ca
	Director of Environment and Natural Resources	709-634-0998 Ian Sullivan: isullivan@qalipu.ca

4.4 Reporting and Engagement

Calibre's VGM team will continue to engage with each Indigenous group following notification of the accident or malfunction, including providing the IG group appointed contact with information on adverse environmental effects and mitigation measures.

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Within 30 days after the occurrence of the accident or malfunction, Calibre will report to each Indigenous group on any adverse environmental effects of the accident or malfunction and describe the measures taken by Calibre to mitigate the adverse environmental effects.

Calibre will provide each group the opportunity to comment upon the described mitigation measures and include the views and advice of each group in the 30- day and 90-day reports to IACC (as per Federal EA Conditions 10.5.4.3 and 10.5.5.3).

5.0 OPPORTUNITIES TO ASSIST WITH ACCIDENT OR MALFUNCTION RESPONSE

As part of notification, Calibre will provide an opportunity to each Indigenous group to offer their experience, resources and capabilities to provide emergency response services and assist in response to an accident or malfunction.


6.0 REFERENCES

Marathon (Marathon Gold Corporation). 2020. Valentine Gold Project Environmental Impact Statement. September 2020.

Marathon (Marathon Gold Corporation). 2023. Valentine Gold Project the Berry Pit Expansion Environmental Registration / Environmental Assessment (Valentine Gold Project) Update. August 2023.

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APPENDIX A SPILL REPORTING INFORMATION FORM

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Spill Reporting Information Form

**TO BE COMPLETED BY THE AREA SUPERVISOR FOLLOWING IMMEDIATE VERBAL
NOTIFICATION TO THE ENVIRONMENT DEPARTMENT**

DATE ISSUED	REVISION NOTES
Date of spill:	Time of spill:
Date reported (verbal):	Time reported (verbal):
Reported by (include title):	Company:
Supervisor:	Phone number:
Description of source spill:	
Equipment ID # (if applicable):	
Type of substance spilled:	
Quantity of substance spilled:	
Location of spill site:	
Description of spill location and surroundings:	
Distance to nearest infrastructure:	
Distance to nearest stream, waterbodies, sensitive areas:	
Please provide a sketch of the spill site including surrounding infrastructure, waterbodies, sensitive areas, roads, tree lines, etc., including approximate distances from the spill site to each, and use arrows to depict slopes and direction of flow.	
<div></div>	
Description of the cause and any impacts of the spill:	

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Section 2: Containment and Clean-up (describe immediate actions taken to contain and clean-up the spill and any actions remaining)		
Actions taken to contain and clean-up the spill (including storage and/or disposal of contaminated materials including soil and absorbents):		
Remaining clean-up requirements (if applicable):		
Responsible person:		Completion date:
Vehicle spill kit or site spill drum used. Yes / No (note: spill kits/drums must be replaced or restocked, even if only partially used)		
Location or Equipment ID # of spill kit/drum used:		
Section 3: Supporting Documentation (please ensure that all applicable supporting documentation is attached)		
<input type="checkbox"/> Pictures <input type="checkbox"/> Employee Statements <input type="checkbox"/> Pre-use Inspection <input type="checkbox"/> Maintenance Records <input type="checkbox"/> Other (_____)		
Section 4: Signatures (including the employee that observed/reported the spill, his/her Supervisor, and the Calibre Environment reviewer)		
Print	Signature	Date
Employee:		
Supervisor:		
Environment:		

- Notes:
- 1) The Calibre Incident and Investigation Report Form must also be filled out for root cause analysis and to outline corrective actions.
 - 2) Please refer to Section 6.0 of the Environmental Protection Plan (EPP) for guidance in spill response and in filling out this form. Please contact the Calibre Environment Department if you have any questions or concerns.