



EAGLE GOLD PROJECT

SPILL RESPONSE PLAN

Version 2013-01

SEPTEMBER 2013

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1 INTRODUCTION

StrataGold Corporation (SGC), a directly held-wholly owned subsidiary of Victoria Gold Corp., has proposed to construct, operate, close and reclaim a gold mine in central Yukon. The Eagle Gold Project ('the Project') is located 85 km from Mayo Yukon using existing highway and access roads. The Project will involve open pit mining at a production rate of approximately 10 million tonnes per year (Mt/y) ore, an average strip ratio (amount of waste: amount of ore) of 1.45:1.0 and gold extraction using a three stage crushing process, heap leaching, and a carbon adsorption, desorption, and recovery system over a 10 year mine life.

The purpose of this Spill Contingency Plan (the Plan) is to enable timely and effective responses to any spill throughout the life of the Project. The Plan provides measures to prevent spills from occurring, and response measures to be implemented in the event of a spill. This plan was developed in accordance with the spill contingency plan guidelines for QML applications (Quartz Mining License Application Guide, February 2012), and the applicable Yukon Water Board guideline for spill contingency planning.

1.1 COMPANY POLICIES

SGC is committed to exploring for, building, operating and closing mines in an environmentally, socially and financially responsible manner. SGC will endeavor to protect the environment in which it operates by providing a safe, responsible and efficient operating atmosphere through the development, and implementation of corporate policies as well as development and operational plans.

Corporate policies relevant to the Spill Response Plan are provided in Appendix A and include:

- Accident and Incident Reporting Policy
- Environmental Policy Statement
- Heritage Resources Protection Policy
- Occupational Health and Safety Policy Statement
- Site and Project General Rules
- Vehicle Travel and Communication (Eagle Project) Policy

This plan has been developed in accordance with the Terms and Conditions of Recommendation, Proponent Commitments and Proponent Mitigations specified in the Final Screening Report and Recommendation (Yukon Environmental and Socio-economic Assessment Board Project Assessment 2010-0267) for the Eagle Gold Project.

The Plan will serve as a guidance document for spill prevention and response for the Dublin Gulch Property. Once the Chief of Energy, Mines and Resources approves this Plan, it will supersede previous documents submitted for the acquisition of the Class 4 Mining Lands Approval LQ00303 issued pursuant to the *Quartz Mining Act* and *Quartz Mining Land Use Regulations* and the Type B Water Use License QZ11-013 issued pursuant to the *Waters Act* and *Waters Regulation*.

Table 1.2-1 summaries the requirements pertaining to spill prevention and response outlined in the Final Screening Report and Recommendation and other licenses and permits issued to date.

Table 1.2-1: Assessment, Licence and Permit Requirements for Spill Prevention and Response

Document, License or Permit	Section Number	Requirement
Final Screening Report and Recommendation: Terms and Condition of Recommendation	11	As proposed, the Proponent shall ensure a certified cyanide transporter is used and appropriate driver training, radio contact capabilities, vehicle maintenance, and emergency clean-up kits will be on trucks carrying NaCN. Furthermore, the Proponent shall ensure that emergency clean-up kits include equipment to contain NaCN as well and material to protect from, and respond to, cyanide toxicity in spill responders.
Final Screening Report and Recommendation: Terms and Condition of Recommendation	23	<p>The proponent shall ensure that the following communication elements are in the ERP:</p> <ul style="list-style-type: none"> a) Notification to management, regulatory agencies, outside response providers and medical facilities of the cyanide emergency. b) Notification to potentially affected communities of the cyanide related incident and any necessary response measures. c) Communication protocols with the media.
Final Screening Report and Recommendation: Proponent Commitments	97	<p>SGC will implement the following to maximize road and transport safety:</p> <ul style="list-style-type: none"> a) Ensure trucking/hauling contractors have appropriate driver training, radio contact capabilities, vehicle maintenance requirements, and spill response capabilities b) Ensure all hazardous materials are transported and handled in accordance with the Transport of Dangerous Goods Act and Regulations
Final Screening Report and Recommendation: Proponent Commitments	98	<p>SGC commits to the following spill prevention and response measures:</p> <ul style="list-style-type: none"> a) If there is any doubt regarding the size of a spill, material involved, and whether it is reportable, SGC will err on the side of caution and report the spill. b) Caches of spill response materials will be placed along the access road as required by the Spill Contingency Plan, including the Haggart Creek Crossing. c) Project staff will have appropriate emergency response and spill contingency training and knowledge. Equipment, materials, and procedures will be maintained to limit the consequences of releases to the environment through prompt containment and clean-up. d) Fuels, hydrogen peroxide, and other hazardous liquids will be transferred from tanker trucks to storage tanks by enclosed lines, hoses, and pumps equipped with pressure transducers and volume counters to ensure tanks cannot be overfilled. e) No lubrication, refuelling or maintenance of equipment will occur within 30 m of wetlands or watercourses. f) All fuelling and lubrication of construction equipment will be carried out in a manner that minimizes the possibility of spills. All containers, hoses, and nozzles will be free of leaks and all fuel nozzles equipped with functional automatic shut-offs. g) Where stationary equipment cannot be relocated more than 30 m from a watercourse, it will be situated in a designated area that has been bermed and lined with an impermeable barrier with a holding capacity equal to 125% of the largest tank within the berm. h) Equipment operators will be appropriately trained in spill response procedures and carry spill kits capable of handling spills on land and water.

Document, License or Permit	Section Number	Requirement
Final Screening Report and Recommendation: Proponent Commitments	110	SGC is committed to developing and implementing Environmental Management Plans with the following components: a) Spill Contingency Plan
Final Screening Report and Recommendation: Proponent Commitments	112	...The ERP will include the following commitments: a) Resource inventories of personnel, equipment, first aid kits, spill kits, and clean-up materials will be maintained on-site and updated regularly. These inventories will also contain information on external resources available off-site (e.g., RCMP, fire department, other mining establishments in the vicinity). b) All staff on site will receive basic training, including environmental awareness, general emergency response, spill contingency measures, and communication procedures. Truck drivers transporting hazardous materials will also receive additional training on spill response, hazardous material handling, and emergency driving techniques. All security personnel will be trained in first aid.
Final Screening Report and Recommendation: Proponent Mitigations	26	Prevent and respond to all potential spills.
Final Screening Report and Recommendation: Proponent Mitigations	59	Fuel, hazardous material and explosives will be managed according to industry standards including; storage in appropriate containers; containment areas sized to hold the larger of 110% of the largest tank or 10% of the total maximum volume of all tanks in the facility; and storage of explosives in separate buildings away from the rest of the mine activities.
Class 4 Mining Lands Approval LQ00303	6	All spills must be reported immediately to the 24-Hour Yukon Spill Reporting Line (867) 667-7244 and to the Mining Inspections Division (867) 456-3882.
Class 4 Mining Lands Approval LQ00303	37	A spill contingency plan for petroleum products and other hazardous waste must be prepared and posted in the camp and at all fuel handling locations used in carrying out the exploration program. The spill plan shall include reporting to EMR-CSI Mining Inspections and the Chief to ensure compliance with spill reporting requirements.
Class 4 Mining Lands Approval LQ00303	38	All spill clean-up equipment and material must be maintained in a state of readiness sufficient at all times to contain and clean-up any hazardous material spills.
Class 4 Mining Lands Approval LQ00303	39	If a spill occurs, the spill contingency plan must be immediately implemented and notice given to the 24-hour Yukon Spill Report Line. As soon as practicable, an inspector must be contacted. Whatever remedial action is required to clean-up the spill and reclaim the affected land and water must be taken.
Class 4 Mining Lands Approval LQ00303	40	Routine maintenance areas where heavy equipment is serviced or repaired should be inspected regularly for minor spills and stored waste hydrocarbons.
Class 4 Mining Lands Approval LQ00303	41	Any contaminated soils should be excavated and contained for eventual land farm treatment at an approved facility.
Type B Water Use Licence QZ11-013	5	Where a spill or unauthorised discharge occurs, that is of a reportable quantity under the Yukon <i>Spill regulations</i> , the Licensee shall immediately contact the 24-hour Yukon Spill Report number, (867) 667-7244 and implement the Spill Contingency Plan. A detailed written report of any such event including, but not limited to , dates, quantities, parameters, causes and other relevant details and explanations, shall be submitted to the Board not later than 10 days after the occurrence.

Eagle Gold Project
Spill Response Plan

Section 1: Introduction

Document, License or Permit	Section Number	Requirement
Type B Water Use Licence QZ11-013	6	The Licensee shall apply the relevant procedures in the Spill Contingency Plan. The Licensee shall review the Spill Contingency Plan annually and shall provide a summary of that review including any revisions to the plan, as a component of the annual report.
Type B Water Use Licence QZ11-013	7	The Licensee shall maintain a log book of all spill or unauthorized discharge occurrences, including spills that are less than the reportable quantities under the Yukon <i>Spill Regulations</i> . The log book shall be made available at the request of an Inspector. The log book shall include, but not necessarily be limited to the: <ol style="list-style-type: none"> a) date and time of the spill; b) substance spilt or discharged; c) approximate amount spilt or discharged; d) location of the spill; e) distance between the spill or discharge and the nearest Watercourse; and f) remedial measure taken to contain and clean-up the spill area or to cease the unauthorized discharge.
Type B Water Use Licence QZ11-013	9	All personnel shall be trained in procedures to be followed and the equipment to be used in the containment of a spill.
Type B Water Use Licence QZ11-013	11	The Spill Contingency Plan shall be posted on site for the duration of the works.
Type B Water Use Licence QZ11-013	13	Fuel, lubricants, hydraulic fluids, coolants and similar substances shall be stored and/or transferred a minimum of 30 metres from the Natural Boundary of any Watercourse, in such a way that said substances are not deposited in or allowed to be deposited in waters.

2 SPILL DEFINITION AND CATEGORIES

2.1 SPILL DEFINITION

A spill is defined under Section 132 of the *Yukon Environment Act* (“the Act”) as a “release of a substance into the natural environment; from or out of a structure, vehicle or other container; and that is abnormal in quantity or quality in light of all the circumstances of the release; or in excess of an amount specified in the regulations”. For the purposes of the *Act*, a “substance” means a hazardous substance, pesticide, contaminant or special waste.

2.2 REPORTABLE SPILLS

Schedule A of the *Yukon Spills Regulations* defines reportable spill quantities in reference to hazardous material classes defined under the *Transportation of Dangerous Goods Regulations*. The release into the environment of a hazardous material above the reportable quantities or any release into a watercourse is a reportable spill under the *Yukon Spills Regulations* and SGC is required immediately notify the 24-hour Yukon Spill Report line at:

867-667-7244

Spill Reporting Forms will be completed for all spills (Appendix B). Reporting thresholds for all substances including hazardous materials, pesticide, contaminant or special waste used or stored at the Project are provided in Appendix C. A list of emergency contact numbers is provided in Appendix D. Material Safety Data Sheets for all hazardous substances used for the Project at risk of spills are provided by the Solid Waste and Hazardous Materials Management Plan.

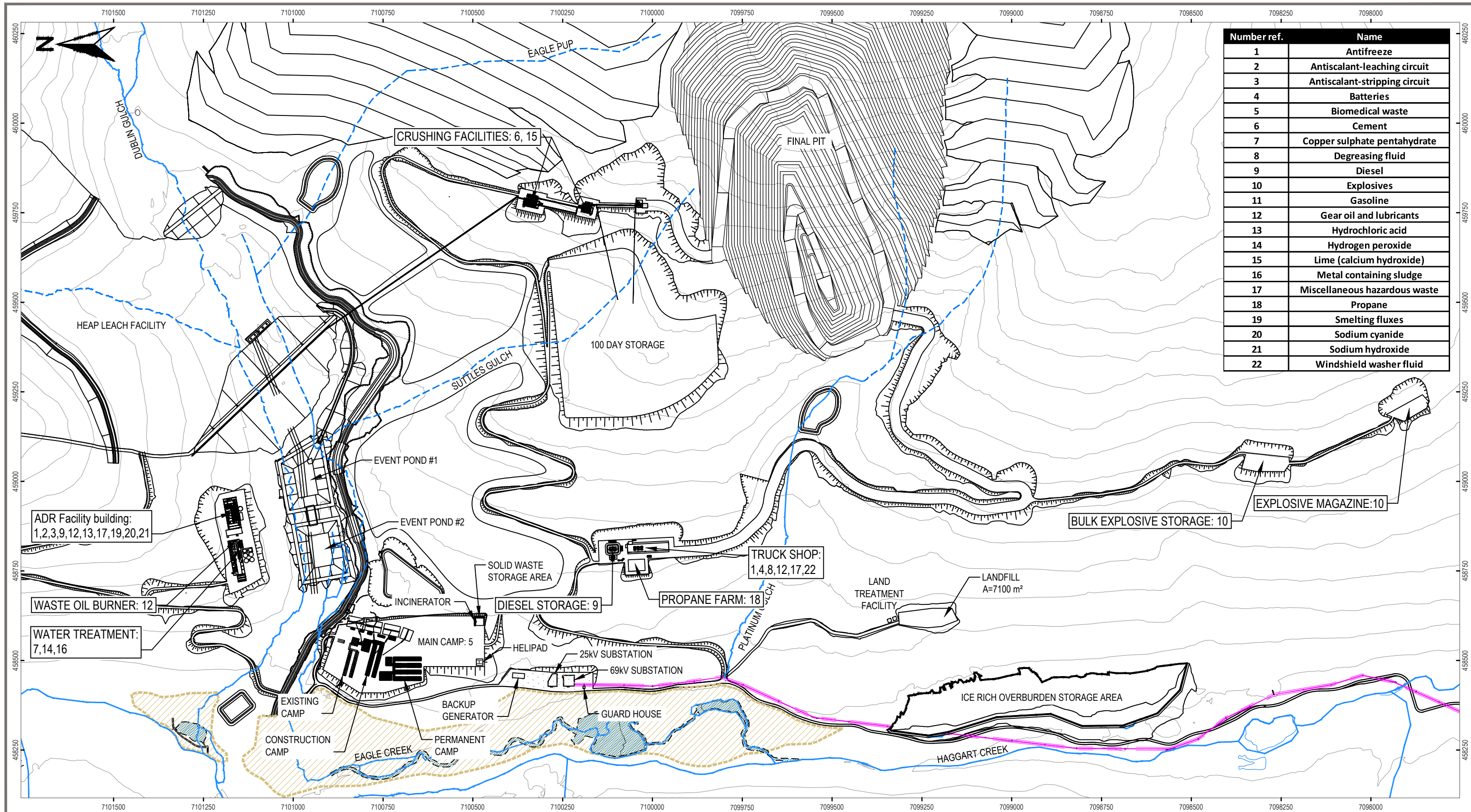
2.3 NON-REPORTABLE SPILLS

Spilled materials which are below the reporting thresholds are not required to be reported externally, however, the SGC Environmental Department will maintain a record of all spills. In these cases, spills will be handled according to the Spill Response Procedure described in Section 3 of this Plan. After any non-reportable spill is controlled and cleaned up, the Environmental Department will complete the spill records, and replenish spill cleanup supplies used for the response.

2.4 STORAGE LOCATIONS AND USE OF HAZARDOUS MATERIALS

Hazardous materials used on site and storage locations are described by the Solid Waste and Hazardous Materials Management Plan and shown on Figure 2.4-1.

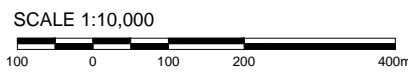
SGC will ensure that spill kits are available at sites where hazardous materials are stored and used. SGC will ensure that spill kits are compatible with the type and volume of material stored and used (spill kits can be specifically equipped for hydrocarbon spills or for miscellaneous hazardous materials). An inventory of spill kits will be maintained and monthly inspections will be carried out on spill kits.



Number ref.	Name
1	Antifreeze
2	Antiscalant-leaching circuit
3	Antiscalant-stripping circuit
4	Batteries
5	Biomedical waste
6	Cement
7	Copper sulphate pentahydrate
8	Degreasing fluid
9	Diesel
10	Explosives
11	Gasoline
12	Gear oil and lubricants
13	Hydrochloric acid
14	Hydrogen peroxide
15	Lime (calcium hydroxide)
16	Metal containing sludge
17	Miscellaneous hazardous waste
18	Propane
19	Smelting fluxes
20	Sodium cyanide
21	Sodium hydroxide
22	Windshield washer fluid

LEGEND

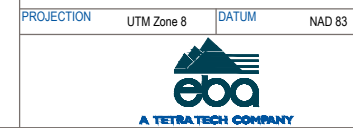
- Site Infrastructure & Facilities
- Haggart Creek Access Road
- Watercourses
- - - Watercourses (to be diverted or infilled)
- ▨ Fish Habitat Compensation Area
- Transmission Line



NOTES

- All elevations are in meters.
- Contour data received from Underhill (February 2011) UTM NAD 83.
- 25 m Contour intervals Shown.

STATUS
NOT FOR CONSTRUCTION



**EAGLE GOLD PROJECT
YUKON TERRITORY**

**Overall Site Plan and Location of
Storage Areas for Hazardous Materials**

PROJECTION	UTM Zone 8	DATUM	NAD 83
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FILE NO.	DWN	OKD	REV
V23201707	SF	TG	0
OFFICE	DATE		
EBA-VANC	April 19, 2013		

Figure 2.4-1

3 SPILL RESPONSE PROCEDURE

The immediate priority in the event of a spill is to ensure the safety of any personnel in the immediate vicinity and to minimize the potential impact to the environment due to a sustained release of hazardous material. The implementation of spill containment measures and site cleanup and remediation will only be undertaken when safety is assured and the source of the release has been controlled.

Before responding to any spill, it is important to first STOP and THINK:

- Identify hazards
- Assess Risks
- Control Risks

The priority sequence for spill response is as follows:

1. ENSURE SAFETY

- Identify the spilled material (if not possible, assume dangerous)
- Use Personal Protective Equipment
- Ensure the safety of nearby personnel
- Remove all ignition sources – no smoking

2. FIRST AID

- Call for assistance if necessary
- Attend to the injured
- Begin first aid immediately as required by following the guidelines from Material Safety Data Sheets for the substance released

3. STOP THE FLOW (IF POSSIBLE)

- Close valves, shut off pumps and plug holes or leaks (if safe to do so)

4. NOTIFY YOUR SUPERVISOR AND/OR SPILL RESPONSE TEAM

- Provide basic information of spill – What, Who, Where, When and How
- Activate Spill Response Team

5. SECURE THE AREA

- Limit access to the spill area and prevent unauthorized entry

6. CONTAIN THE RELEASE

- Block off and protect drains, culverts, and other drainage structures which are not designated for spill management

- Use dykes, berms, trenches, ditches or sorbent material from spill kits to control the spilled substances

7. CLEAN-UP

- Under the direction of the Spill Response Team, begin clean-up activities

8. REPORT THE SPILL

- The Environmental Manager, or designate, will report the spill to the appropriate agencies.

9. CONDUCT INCIDENT INVESTIGATION

- Undertake appropriate corrective and preventative action and document all activities on the Spill Report Form

3.1 SPILL RESPONSE EQUIPMENT

Spill kits will be available at all hazardous materials storage sites and transfer areas as shown in Figure 2.4-1. Spill kits will also be available in hazardous material transporters, heavy equipment and light trucks. Spill kits will contain booms, sorbent materials, shovels and personal protective equipment, and fire extinguishers will be located in close proximity to assist in responding to a possible spill incident involving flammable materials. Spill kits will also contain a kit inventory sheet to assist with monthly inspections and the replenishment of spent supplies and equipment. The SGC Environmental Department will be responsible for monthly spill kit inspections, the replenishment of spent supplies and equipment, and ensuring that the site is equipped with a spare fully stocked 50 Gallon Spill response kit. The spare 50 Gallon Spill response kit will be deployed to other locations in the event of a spill requiring additional equipment or as a replacement until spent, location specific, kits can be replenished.

If there is a risk of spills on open water, surface booms will be available for deployment.

All spill kits will include a the 2012 Emergency Response Guidebook which has been developed jointly by Transport Canada (TC), the U.S. Department of Transportation (DOT), the Secretariat of Transport and Communications of Mexico (SCT) and with the collaboration of CIQUIME (Centro de Información Química para Emergencias) of Argentina, for use by fire fighters, police, and other emergency services personnel who may be the first to arrive at the scene of a transportation incident involving dangerous goods.

The Emergency Response Guidebook is a guide to aid first responders in quickly identifying the specific or generic hazards of the material(s) involved in the incident, and protecting themselves and the general public during the initial response phase of the incident.

Table 4.1-1 provides an inventory of Spill Response Equipment, which will be strategically located around the Project Site:

Table 3.1-1: Inventory of Spill Response Equipment Planned for the Eagle Gold Project

Location	Type of Equipment
ADR Facility – Reagent Storage area	2X100 Gallon Spill response carts containing: <ul style="list-style-type: none"> ▪ Booms, sorbent pads, socks, dikes, pillows ▪ Hazmat Chemical Absorbent Pulp ▪ Disposal bags and Ties

Section 3 Spill Response Procedure

Location	Type of Equipment
	<ul style="list-style-type: none"> ▪ Neoprene Drain Cover ▪ Spill Response Plan ▪ Emergency Response Guidebook ▪ Chemical-resistant gloves ▪ Goggles <p>This location will also be equipped with the following:</p> <ul style="list-style-type: none"> ▪ Self-contained breathing apparatus ▪ Totally-Encapsulating Chemical Protective (TECP) suits ▪ Escape air packs (10 minute)
<p>ADR Facility – At each reagent handling area</p>	<p>2X50 Gallon Spill kits containing:</p> <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Hazmat Chemical Absorbent Pulp ▪ Neoprene Drain Cover ▪ Chemical-resistant Gloves ▪ Goggles ▪ Spill Response Plan ▪ Emergency Response Guidebook <p>This location will also be equipped with the following:</p> <ul style="list-style-type: none"> ▪ Self-contained breathing apparatus ▪ Totally-Encapsulating Chemical Protective (TECP) suits ▪ Escape air packs (10 minute)
<p>Mine water treatment plant</p>	<p>1X100 Gallon Spill response carts containing:</p> <ul style="list-style-type: none"> ▪ Booms, sorbent pads, socks, dikes, pillows ▪ Hazmat Chemical Absorbent Pulp ▪ Disposal bags and Ties ▪ Chemical-resistant Gloves ▪ Goggles ▪ Neoprene Drain Cover ▪ Spill Response Plan ▪ Emergency Response Guidebook <p>This location will also be equipped with the following:</p> <ul style="list-style-type: none"> ▪ Respirators ▪ Totally-Encapsulating Chemical Protective (TECP) suits ▪ Escape air packs (10 minute)
<p>Truck shop</p>	<p>2 X 50 Gallon Spill kits containing:</p> <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Neoprene Drain Cover ▪ Chemical-resistant Gloves ▪ Goggles ▪ Shovels ▪ Spill Response Plan

Section 3: Spill Response Procedure

Location	Type of Equipment
	<ul style="list-style-type: none"> ▪ Emergency Response Guidebook <p>This location will also be equipped with the following:</p> <ul style="list-style-type: none"> ▪ Respirators
Crushing and screening plant	<p>1 X 50 Gallon Spill kits containing:</p> <ul style="list-style-type: none"> ▪ Booms, Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Neoprene Drain Cover ▪ Chemical-resistant Gloves ▪ Goggles ▪ Shovels ▪ Spill Response Plan ▪ Emergency Response Guidebook <p>This location will also be equipped with the following: Respirators</p>
Fuel storage facility	<p>1 X 50 Gallon Spill kits containing:</p> <ul style="list-style-type: none"> ▪ Booms, Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Neoprene Drain Cover ▪ Chemical-resistant Gloves ▪ Goggles ▪ Shovels ▪ Spill Response Plan ▪ Emergency Response Guidebook <p>This location will also be equipped with the following: Respirators</p>
Explosives storage facility	<p>1 X 50 Gallon Spill kits containing:</p> <ul style="list-style-type: none"> ▪ Booms, Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Neoprene Drain Cover ▪ Chemical-resistant Gloves ▪ Goggles ▪ Shovels ▪ Spill Response Plan ▪ Emergency Response Guidebook <p>This location will also be equipped with the following: Respirators</p>
Camp	<p>1 X 50 Gallon Spill kits containing:</p> <ul style="list-style-type: none"> ▪ Booms, Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Neoprene Drain Cover

Section 3 Spill Response Procedure

Location	Type of Equipment
	<ul style="list-style-type: none"> ▪ Chemical-resistant Gloves ▪ Goggles ▪ Shovels ▪ Spill Response Plan ▪ Emergency Response Guidebook <p>This location will also be equipped with the following:</p> <ul style="list-style-type: none"> ▪ Respirators
Solid Waste Storage Area	<p>1 X 50 Gallon Spill kits containing:</p> <ul style="list-style-type: none"> ▪ Booms, Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Neoprene Drain Cover ▪ Chemical-resistant Gloves ▪ Goggles ▪ Shovels ▪ Spill Response Plan ▪ Emergency Response Guidebook <p>This location will also be equipped with the following:</p> <ul style="list-style-type: none"> ▪ Respirators
Substation	<p>1 X 50 Gallon Spill kits containing:</p> <ul style="list-style-type: none"> ▪ Booms, Sorbent Pads, Socks, Pillows ▪ Disposal Bags and Ties ▪ Granular Absorbent ▪ Neoprene Drain Cover ▪ Chemical-resistant Gloves ▪ Goggles ▪ Shovels ▪ Spill Response Plan ▪ Emergency Response Guidebook <p>This location will also be equipped with the following:</p> <ul style="list-style-type: none"> ▪ Respirators
<p>Inside mine vehicles: Fuel carts Utility vehicles Explosive transport vehicles Emergency response vehicles</p>	<p>Vehicle spill kits containing:</p> <ul style="list-style-type: none"> ▪ Sorbent Pads, Socks and Pillows ▪ Disposable Bags and Ties ▪ Granular Absorbent ▪ Neoprene Drain Cover ▪ Chemical-resistant Gloves ▪ Goggles ▪ Shovels ▪ Spill Response Plan ▪ Emergency Response Guidebook

An inventory of spill kits will be maintained and monthly inspections will be carried out to ensure that they are suitably stocked. Onsite Environmental Coordinator and Technicians will ensure that used spill kits are re-

stocked immediately after a spill has occurred. All spill kits will have Material Safety Data Sheets for the substances used on the Project.

3.2 DUTIES AND RESPONSIBILITIES

To ensure human safety and limit potential environmental effects resulting from a spill, all site personnel will have specific responsibilities when responding to a spill. The responsibilities for spill response are summarized in Table 3.2-1.

Table 3.2-1: Position and Responsibilities of Personnel Involved in Spill Response

Position	Responsibilities
All Personnel (First Observer)	<ul style="list-style-type: none"> ▪ Assess the initial severity of the spill and safety concerns ▪ Identify the source of the spill ▪ Ensure the safety of nearby personnel ▪ Begin first aid immediately as required ▪ Report all spills to Supervisor and Environmental Coordinator as soon as possible ▪ Determine the size of the spill and, if safe to do so, stop or contain it ▪ Remove all ignition sources if safe to do so ▪ Participate in spill response as a member of cleanup crew under the direction of the Spill Response Team
Supervisors	<ul style="list-style-type: none"> ▪ Contact the Mine Manager ▪ Report to the site of the spill ▪ Gather information on the spill (substance, location, approximate area/quantity, in water, etc.) ▪ Participate in spill response as a member of cleanup crew under the direction of the Spill Response Team
Emergency Response/Spill Response Team	<ul style="list-style-type: none"> ▪ Report to the site of the spill ▪ Assume primary role for first aid (Emergency Response Team) ▪ Stop or contain the spill ▪ Remove all ignition sources ▪ Take appropriate response measures – deploy booms, absorbents, and other equipment and materials as required ▪ Continue cleanup as directed by Mine Manager or Environmental Coordinator
General Manager	<ul style="list-style-type: none"> ▪ Coordinate initial and ongoing response efforts ▪ Ensure source of spill has stopped and contain spill ▪ Record spill information ▪ Ensure coordination of equipment and personnel as needed ▪ Oversee the cleanup operation until it is satisfactorily completed ▪ Decide with the Environmental Coordinator if mobilization of additional equipment, resources or personnel is warranted
Environmental Manager /Coordinator	<ul style="list-style-type: none"> ▪ Report the spill to the Yukon 24-Hour Spill Report Line and Energy Mines and Resources - Client Services and Inspections ▪ Ensure timely response and cleanup of spill site and impacted areas ▪ With the Mine Manager, decide if additional equipment, resources or personnel is required for containment and remedial activities ▪ Notify senior management

Position	Responsibilities
	<ul style="list-style-type: none"> Oversee completion and distribution of Spill Report Ensure investigation identifies measures to prevent similar spills
Chief Operating Officer / VP Environment and Community Affairs	<ul style="list-style-type: none"> Communicate with the media for large spills when required. Ensure that all press releases are accurate and in accordance with company policy Make financial decisions on major expenses during large spill response Oversee preventative measures to ensure risk of a similar incident is mitigated

3.3 CONTAINMENT AND CLEANUP PROCEDURES

Containment methods for substances spilled vary depending on size of the spill, location (inside buildings or outside), terrain and soil type, proximity to watercourses, climatic conditions and the availability of equipment and personnel.

Various practical methods of containment and recovery have been proven and effective for use in northern climates on land, snow ice or in open water. These methods are summarized in Table 3.3-1.

Table 3.3-1: Spill Containment Procedures

Spill location	Response Actions	Containment Methods	Limitations	Required resources
Snow and Ice	<ul style="list-style-type: none"> Stop spill source Eliminate ignition sources Block entry to waterways with snow dyke or other barrier Trench or ditch to intercept or contain spill Compact snow around spill to increase retention Contain or collect contaminated snow 	Snow or Ice dykes	<ul style="list-style-type: none"> Best suited for flat areas in winter Requires sufficient snow or ice 	<ul style="list-style-type: none"> Shovels Heavy equipment
		Snow or Ice trench	<ul style="list-style-type: none"> Requires sufficient snow or ice Only applicable when ice is >1m thick Generally requires mechanical equipment for construction on ice 	<ul style="list-style-type: none"> Shovels Heavy equipment Ice chain saws
		Sorbent berm	<ul style="list-style-type: none"> Requires sufficient, readily available sorbent material Impractical for larger spills 	<ul style="list-style-type: none"> Sorbents
Land	<ul style="list-style-type: none"> Stop spill source Eliminate ignition sources Block entry to waterways with sand or gravel dyke Trench or ditch to intercept or contain spill Deploy sorbents Recover liquids with pumps or vacuum equipment 	Sand or gravel dykes	<ul style="list-style-type: none"> Best suited for flat areas Requires sufficient, easily excavated material if hand tools are being used 	<ul style="list-style-type: none"> Shovels Heavy equipment Sandbags or liner material if available Pump out equipment
		Land trench	<ul style="list-style-type: none"> Can be difficult to excavated if soil is frozen Not conducive to areas with shallow bedrock 	<ul style="list-style-type: none"> Shovels Heavy equipment Pump out equipment
		Sorbent berm	<ul style="list-style-type: none"> Requires sufficient, readily available sorbent material Impractical for larger spills 	<ul style="list-style-type: none"> Sorbents

Section 3: Spill Response Procedure

Spill location	Response Actions	Containment Methods	Limitations	Required resources
Open Water	<ul style="list-style-type: none"> ▪ Stop spill source ▪ Eliminate ignition sources ▪ Deploy sorbent booms or containment booms to control spread of substance 	Sorbent boom	<ul style="list-style-type: none"> ▪ Requires sufficient, readily available sorbent material ▪ No suitable for fast moving watercourses 	<ul style="list-style-type: none"> ▪ Sorbents
		Containment boom	<ul style="list-style-type: none"> ▪ Requires sufficient, readily available sorbent material 	<ul style="list-style-type: none"> ▪ Sorbents

An effective way of controlling spills on land is through the construction of trenches or berms using sand and gravel. Small spills may be contained manually using shovels. More substantial spills may require the use of mining machinery to dig trenches or place berm material.

Since snow has absorbent and containment properties, snow can be very effective for containing spills. Liquid spills typically become immobile within the snow pack and can be easily removed for transport for recovery or disposal. Snow will be used to its advantage in the construction of snow dykes, and whenever possible, the snow pack will be left in place to avoid contaminating the underlying substrate. For spills on ice, the methods of containment are similar to those used on land.

Spills occurring on open water (e.g. water retention ponds) will spread very rapidly, and therefore, initial preventative measures such as those described in Section 7.0 will be taken to minimize the potential for spills to enter open water. In the event of a petroleum product spills on open water, booms will be deployed immediately to limit the spread of the product and to facilitate recovery, by absorbents or by pumping.

3.4 OFF-SITE RESOURCES

With the exception of medical aid incidents, external resources will be authorized only by the Site Manager or designate, or those with higher level of responsibility. Key municipal, territorial and federal services and contact numbers are provided in Table 3.4-1.

Table 3.4-1: Municipal, Territorial and Federal Services and Contact Numbers

Name	Office	Location
Canutec – Emergency Response for TDG spill	613-996-6666 or *666 on a cellular phone	Ottawa
Mayo Nursing Station	867-996-4444	Mayo
Mayo Fire & Rescue	867-996-2222	Mayo (Volunteer Responders)
Mayo RCMP	Emergency: 867-996-5555 Admin: 867-996-2677	Mayo
Whitehorse Regional Hospital - Emergency and Admissions	867-393-8700	Whitehorse
Yukon Coroner	867-667-5317	Whitehorse

Name	Office	Location
Environment Yukon Conservation Officer – Kevin Johnstone	867-996-2202	Mayo
Environment Yukon Conservation Officer Services Branch	867-667-8005	Whitehorse
Environment Yukon Fish and Wildlife Branch	867-667-5715	Whitehorse
Fisheries and Oceans Canada	867-393-6722	Whitehorse
Yukon Energy Corporation	867-996-2387	Mayo
Yukon Energy Corporation	1-800-676-2843	After hours Whitehorse
Yukon Workers' Compensation Health and Safety Board, Chief Mines Safety Officer, Occupational Health & Safety Branch - Bruce Milligan	867-332-2669 (cell)	Whitehorse
Yukon Workers' Compensation Health and Safety Board 24-Hour Emergency Line for Reporting Serious Workplace Incidents and Injuries	867-667-5450	Whitehorse

3.5 FIRE SUPPRESSION

The Fire Response Procedure in the Emergency Response Plan must be implemented in the event of a fire.

Fire suppression equipment will be located at all hazardous materials storage, transfer and dispensing areas. If a spill of a flammable substance occurs and is ignited, firefighting efforts may be required prior to spill containment and cleanup. Personnel will be made aware of substance specific dangers prior to conducting fire suppression activities.

Any individual discovering a fire is responsible for attempting to control it and notifying his or her supervisor. (Note: Any attempt to control the fire should be made without exposing oneself to risk or injury).

An individual should never enter a smoke-filled environment without self-contained breathing apparatus and appropriate protective clothing. If a fire is not immediately extinguished and poses an active threat to human health or the environment, then a 'Mayday' call that describes the size and location of the fire must be activated. Immediately notify the Mine Manager in such an event.

In the event that Mine Manager deems that site wide evacuation is necessary, all personnel must gather at the main Administration Office so that transport from the site can be arranged, and all mine personnel can be accounted for.

The Mine Manager or designate must:

- Take and remain in charge of firefighting activities until the fire is extinguished

- Ensure all personnel not involved are evacuated to a safe zone and instructed to be on standby for deployment on firefighting duties
- Identify all fire extinguishers used in the firefighting effort and ensure they are serviced, tested, re-charged, and returned for re-use.

3.6 CONTAMINATED SOIL

If cleanup material contains hazardous materials, it will be disposed of in accordance with the MSDS directions for the applicable material. Caution will be taken with reactive chemicals to make sure disposal of the material does not create additional danger through potential reaction with other materials.

Hazardous materials that cannot be re-used or recycled will be handled in accordance with SGC's Solid Waste and Hazardous Materials Management Plan.

A land treatment facility will be constructed for the progressive treatment and remediation of hydrocarbon contaminated soils as and when required. The land treatment facility will be located adjacent to the landfill area and will consist of two cells that are 10 m by 10 m each. If soil permeability in the facility is greater than 10^{-5} cm/s, a geo-membrane liner will be installed and covered with fine grained gravel or soil to temporarily store and land farm contaminated soil. The area will be leveled and sloped such that run-off from the area can be contained and treated prior to release to the receiving environment.

Hydrocarbon contaminated soils will be stored within the land treatment facility and remediated by regular tilling (aeration) and standard northern bioremediation practices. Runoff from the facility will be collected in a sump and treated via an oil water separator in the sump prior to discharge to ground. The construction of dual cells will allow the treatment of contaminants in cell 1 while soils are added to cell 2, remediation occur treatment in summer months only. Contaminated soils will be tested for hydrocarbons prior to treatment and will be tested for F1/F2/F3/F4 (one test per 50 cubic meters). Application of fertilizer and water 1kg fertilizer per ton and 100 liters of water per ton - water content may vary depending on moisture content of the contaminated soils. Aeration of hydrocarbon soils mix and introduce oxygen to reaction - aeration will occur every two weeks - testing of contaminated soils every 4 weeks. Once the material has been remediated to meet *Yukon Contaminated Sites Regulations Numerical Soil Standards for Industrial Land Use*, SGC will obtain approval from Environment Yukon to remove the material from the treatment facility for re-application as required around the Project site.

4 INTERNAL AND EXTERNAL REPORTING

Any spill for which reporting is required, as described in Section 2.2, will be reported to the 24-hour Yukon Spill Report Line. The reporting sequence below will be followed to allow for an efficient and effective response, completion of an accurate spill report, and timely notification of SGC management, government agencies, and First Nations.

- The First Observer (the person who discovers the spill) will identify the source and report to his/her direct supervisor.
- The supervisor will gather spill information and provide to the General Manager.
- The General Manager will record the information regarding the spill and forward it to the Environmental Manager or Environmental Coordinator.
- The Environmental Manager or Environmental Coordinator will report the spill to SGC senior management and the 24-hour Spill Report Line and the Department of Energy, Mines and Resources - Client Services and Inspections, as well as overseeing the completion and distribution of spill-related information.

5 TRAINING REQUIREMENTS

All personnel on site involved with the handling, use, storage and transportation of hazardous substances will be trained in the procedures for responding to and reporting of spills. Training topics will include:

- Workplace Hazardous Materials Information System (WHMIS) – renewed every 3 years and mandatory for all new hires
- Transportation of Dangerous Goods
- Hazmat training will be delivered to Emergency Response Team members

The following spill related topics will be covered during site orientation for all personnel:-

- Responsibilities of personnel
- Causes of spills and preventative measures
- Control, containment and cleanup methods for various spill locations
- Emergency contact information and location
- Storage and disposal of materials used on site
- Reporting requirement and procedure
- Overview of Spill Response Plan
- PPE requirements for handling potential spill materials

6 BEST MANAGEMENT PRACTICES

SGC will incorporate best management practices (BMP's) into all work procedures and plans. BMPs relating to spills are outlined below.

6.1 HEALTH AND SAFETY

SGC will implement a system of workplace inspections to ensure that procedures put in place to prevent incidents and accidents relating to hazardous materials are followed. This system will identify levels of hazard, which will trigger immediate work stoppages, and levels of hazards, which will trigger notification of management. This system will ensure that work does not continue with inadequate provisions for health and safety and those personnel are empowered to act to address unsafe or potentially unsafe scenarios.

Specifically in relation to hazardous materials, the following will be provided:

- Engineering controls and engineered hazardous material handling mechanisms to ensure that manual handling and ergonomic issues do not exacerbate the risk associated with working with hazardous materials.
- Monitoring systems for detection of hazardous solution and gaseous leaks.
- Personal protective equipment designed for use in handling the various types of hazardous materials.
- Communication systems with emergency response capabilities.
- MSDS sheets for all hazardous materials will be readily available anywhere these products are stored or used.
- A copy of the MSDS will be accessible in the site offices.
- Emergency contact information will be posted and kept current.

6.2 SPILL PREVENTION

All personnel that will use or handle hazardous materials will receive Workplace Hazardous Materials Information System (WHMIS) training and will be trained in proper handling, spill response, and PPE use specific to their job tasks.

No lubrication, refueling or maintenance of equipment is permitted to occur within 30 m of watercourses or wetlands. All fuelling and lubrication of equipment will be conducted in a manner that minimizes the possibility of spills with containers, hoses and nozzles kept free of leaks and all fuel nozzles equipped with functional automatic shutoffs.

Sodium cyanide will be mixed with water in a well-ventilated area and maintained at a high pH to prevent the evolution of hydrogen cyanide gas.

The following mitigation measures will be implemented to minimize the potential for transportation incidents that could result in a hazardous substance spill:

- SGC will work with the Department of Highways and Public Works to ensure the access road is properly maintained.
- Speed limits will be strictly enforced for all Project vehicles.
- SGC will ensure trucking and hauling contractors have appropriate driver training, radio contact capabilities, properly maintained vehicles, and spill response capabilities.
- SGC will ensure all hazardous materials are transported and handled in accordance with the *Transportation of Dangerous Goods Act*.
- Signage will be posted along the access road to the Project to ensure non-Project traffic is aware of radio protocols.
- Wildlife migration corridors and crossings along the access road will be identified and signage provided in high risk areas.
- Wildlife crossing and escape points will be plowed in the access road snow banks.
- SGC will have on-site personnel with emergency first aid training to provide primary care in the event of an accident, and will implement the appropriate components of the Emergency Response Plan for the Project.

6.3 SPILL RESPONSE

All site personnel will be familiar with SGC's Spill Response Plan, and their duties and responsibilities. Storage sites will be well labeled, and MSDS sheets are accessible in storage areas. This Spill Response Plan will be kept current, and made available to all personnel. SGC will ensure that suitable commercially available spill kits are used for spill response and that personnel are trained in using the spill response equipment.

6.4 STORAGE OF HAZARDOUS MATERIALS

The Solid Waste and Hazardous Materials Management Plan, describes the method of storage of hazardous materials for the Project. SGC will ensure that all hazardous materials are stored with secondary containment structures, either in the form of concrete foundations with curbed sides or double walling of the primary container. Hazardous material storage areas will be well labeled and access to the storage areas will be restricted.

Spill response equipment will be available at hazardous materials storage locations and will be inventoried, maintained and inspected monthly. Signage will be clearly visible in storage, dispensing and transfer areas. Fire extinguishers and/or fire suppression systems will be located at all hazardous material storage locations. Fuel and lubrication materials will be stored a minimum of 30 m from natural watercourses.

6.5 FUEL TRANSFER PROCEDURES

All personnel responsible for transfer, storage, transportation or handling of fuel will be trained in safe work practices for fuel and lubricants.

Caches of spill response materials will be placed along the South McQuesten Road and the Haggart Creek Road, including at the Haggart Creek crossing. Project personnel will have appropriate emergency response

and spill contingency training and knowledge; equipment, materials and procedures will be maintained to limit consequences of releases of fuel or oil to the terrestrial or aquatic environment through prompt containment and clean-up.

6.5.1 Spill Protection and Prevention

Spill prevention will be undertaken through ensuring that accepted standard operating procedures are employed for the safe and secure transfer of hazardous materials from product transporters and within the Project site. Hazardous materials will be stored in areas that have containment structures such as concrete foundations with curbed sides. Hazardous material handling will be undertaken within the concrete foundations. Equipment handling hazardous materials will be inspected prior to every shift; any inadequacies will be reported to maintenance personnel and repaired prior to continuation with work.

Spills will be responded to using the methods described in this Plan, according to what type of surface they occur on, as described in Section 3.3. Routine inspections and maintenance will be conducted at hazardous material storage and transfer areas. Storage areas will be kept clean through good housekeeping practices.

6.5.2 Dispensing

Storage containers will be stored properly, and will not be over filled. Operating procedures will be established to minimize the potential for fuel spills during dispensing. All personnel handling fuel will be trained on these procedures.

6.6 ROUTINE MONITORING

Monitoring and maintenance is essential in the prevention of spills, and the effective handling of potential spills.

6.6.1 Maintenance

Maintenance procedures will be posted in applicable service areas. Maintenance personnel will be trained and familiar with the procedures. Regular checks will be performed on storage and dispensing equipment to identify any potential problems. If the regular checks identify issues, repairs are to be made prior to continued use of the piece of equipment. Spill response equipment will be kept stocked and maintained, and maintenance logs will be kept.

6.6.2 Perimeter Assessment

The following outlines items that will be identified during inspection:

- Signs of leakage from storage containers, loss of material, cracks, holes etc.
- Signs of inadequacy of secondary containment structures
- Unexpected solution or gaseous emissions will be thoroughly investigated to determine the source and nature of the emissions.
- Discoloration, oily discharges or any unusual odours.

6.6.3 Hazardous Material Storage and Transfer Areas



The following outlines items that will be identified during inspection:

- Spills or stains on the ground.
- Losses of material from storage containers.
- Cracks or damage to storage containers.
- Emergency shut off systems in place, functioning and clearly marked.
- Spill kits are available, adequate and accessible.
- Procedures posted for reference, MSDS sheets are available

APPENDIX A

Corporate Policies

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		POLICY	
		INCIDENT AND ACCIDENT REPORTING	
Department:	Mine Support Services	Document No.:	VGC-MSS-HSC-OP-0009
Section:	Health, Safety and Compliance	Effective Date:	March 1, 2013
Revision:		Replaces:	
Approved:	John McConnell – President & CEO 		

PURPOSE

The purpose of this policy is to outline reporting and investigating requirements for accidents, incidents (near miss), work related injuries, and occupational illnesses.

SCOPE

This policy applies to all employees, contractors, sub-contractors, guests and visitors at any site, office or project of Victoria Gold Corp. (VIT).

RESPONSIBILITIES

1. The Manager, Health, Safety & Compliance is responsible for:
 - maintaining this policy and ensuring all employees are aware and understand the requirements of this policy;
 - working with the Site Manager (or designate) and the appropriate Department Heads and Contractors to ensure that incidents (near miss), accidents, occupational illnesses, work related injuries, are properly investigated, analyzed and reported;
 - where appropriate, including the Joint Occupational Health and Safety Committee in investigations or measures to prevent future occurrences;
 - analyzing and determining the root cause of each occurrence to ensure that lessons are learned, and that the appropriate mitigation actions are approved and implemented to prevent the reoccurrence of a similar incident or accident; and
 - analyzing data to determine trends and issues.

2. The Site Manager is responsible for:
 - responding to all on site incidents (near miss), accidents, work related injuries, and occupational illnesses;
 - notifying the appropriate personnel and recording response of any incident (near miss), accident, occupational illness, and work related injury.

3. Supervisors and Departments Heads are responsible for:
 - ensuring that all incidents (near miss), accidents, occupational illnesses, and work related injuries, are reported and investigated within established timelines.

3. The Joint Occupational Safety and Health Committee is responsible for:
 - ensuring that reports are reviewed and recommending additional corrective and/or

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INCIDENT AND ACCIDENT REPORTING

Department:	Mine Support Services	Document No.:	VGC-MSS-HSC-OP-0006
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- preventative measures where appropriate; and
- participating in investigations as required.

4. Employees and Contractors are responsible for;

- reporting all incidents (near miss), accidents, occupational illnesses, or work related injuries.

POLICY

VIT is committed to the protection of its employees from injury, and to providing a safe and healthy work environment. Although all incidents (near miss), accidents, occupational illnesses, and work place injuries are preventable, occasionally preventative measures will fail and an event will occur. When this happens, they must be reported immediately to your supervisor or, if not available, to the nearest or next-in-line Supervisor or Manager. Investigations will be completed to determine the root cause and develop corrective actions to mitigate all risks to the degree possible.

Hazard Identification

When an individual recognizes a hazard they should not perform any work until the hazard has been appropriately mitigated. Should the hazard be significant, it should be reported immediately to the supervisor.

Some hazardous conditions may be eliminated permanently or guarded temporarily by personnel in the work area. Elimination of hazards by engineering controls (redesign, barriers and guarding) or administrative controls (safe procedures and practices) is by far the best solution.

Depending on the nature and severity of the hazard, an Incident/Accident Investigation Report may be required. This will be determined by the Site Manager in conjunction with the Manager, Health, Safety and Compliance.

Incidents/Accidents

Serious accidents, incidents (near miss), and work related injuries must be dealt with immediately by the relevant supervisor and Site Manager. Notification must be provided to the Manager, Health Safety & Compliance as soon as reasonably possible. The Manager, Health, Safety & Compliance will ensure that it is communicated to Senior Managers and that formal reporting to relevant authorities as per applicable Territorial Legislation is completed within specified timelines.

Once the immediate concern is dealt with, the Supervisor or Manager will ensure the Accident/Incident Investigation Report (Appendix A) is completed and submitted to the Manager, Health Safety & Compliance or his designate within 24 hours.

Upon receipt of the initial report, the Manager Safety, Health & Compliance will complete a risk-rating and determine if an in-depth investigation is required and notify accordingly. This investigation will be coordinated by the Manger Health, Safety & Compliance in conjunction with the Site Manager and appropriate supervisor and/or department head. The detailed investigation should be completed within 72 hours.

For less severe incidents/accidents, and work related injuries the situation must be dealt with immediately as above, and the Accident/Incident Investigation initiated.

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INCIDENT AND ACCIDENT REPORTING

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Upon receipt of the initial report, the Manager Safety, Health & Compliance will complete a risk-rating and determine if an in-depth investigation is required and notify accordingly. This investigation will be coordinated by the Manger Health, Safety & Compliance in conjunction with the Site Manager and appropriate supervisor and/or department head. The detailed investigation should be completed within 72 hours.

Notwithstanding the above the Manager, Health, Safety & Compliance or Vice President may require an investigation be completed on any incident regardless of the risk rating where other potentially more serious outcomes could result.

DEFINITIONS

Accident: An unplanned, undesired event that interrupts the completion of an activity, and that may include injury or property damage.

First Aid Injury: An injury that requires first aid but not medical attention.

Hazard: A source or situation with a potential for harm to people or the environment, damage to property, loss of process or a combination of these

Incident: An unplanned, undesired event that did not cause injury or damage this time but had the potential.

Risk Rating: A measure of the probability of occurrence and severity of the effects.

Medical Aid Injury: A medical injury that does not result in days lost but does require the services of a medical practitioner.

Occupational Illness: An illness resulting from exposure to conditions in the work environment.

Property Damage: When significant damage to equipment or material occurs.

Root Causes: May also be referred to as basic or underlying causes; these are the reasons why the substandard methods and/or substandard conditions occurred and the factors that, when identified, permit meaningful management control. There are root reasons for the occurrence of each substandard method and substandard condition. To prevent the accident from recurring, it is important to determine the root causes. Management controls these root causes.

REFERENCE

Workers Compensation Act, RSY 2008, c12

Occupational Health & Safety Act, RSY 2002, c159

FORMS


Accident/Incident Investigation Report

REVISION HISTORY

Noted below is the revision history of this document.

Revision	Date	Comments

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	ADMINISTRATION POLICY AND PROCEDURE		
	ENVIRONMENTAL POLICY STATEMENT		
Department:	Administration	Document No.:	EP - 1
Effective Date:	December 13, 2010	Replaces:	
Approved:	Victoria Executive Committee		

We respect our employees, the environment, and the communities in which we operate.

The Victoria Group of Companies (Victoria Group) acknowledges that its activities can impact the environment, thus it is our intention to act responsibly by demonstrating stewardship to the environment. The Victoria Group believes that environmental stewardship is not just a matter of “doing the right thing” but that there is also a business case for doing so and that it will create value for our shareholders.


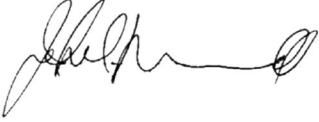
Victoria Group commits to the following principles to ensure environmental stewardship:

- comply with applicable legal requirements;
- work to reduce or avoid potential environmental impacts through effective management, the wise use of resources, pollution prevention and other appropriate mitigative measures;
- establish and review environmental objectives and targets;
- seek continual improvement in our environmental performance through regular review and improvement of our operational procedures;
- ensure that employees and contractors are aware of this policy, understand it, are aware of their roles and responsibilities, and have the appropriate training to do their work; and
- make this policy available to the public through our website.

Victoria Group is committed to exploring for, building, operating and closing mines in an environmental, socially and financially responsible manner.

“Victoria Group of Companies” includes Victoria Gold Corp. and all of its subsidiaries.

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	POLICY		
	Heritage Resource Protection Policy		
Department:	Mine Support Services	Document No.:	VGC-MSS-CA-OP-0002
Section:	Community Affairs	Effective Date:	March 1, 2013
Revision:	N/A	Replaces:	N/A
Approved:	John McConnell, President & CEO 		

PURPOSE

The purpose of this Policy is to formalize Victoria Gold Corp.'s (VIT) commitment to protecting heritage resources by clearly identifying the steps that will be taken upon discovery of a heritage site and/or artifact.

SCOPE

This policy applies to all employees and contractors that may conduct activities that could involve a site discovery of artifacts that considered a Heritage Resource.

RESPONSIBILITIES

1. The Vice President, Mine Support Services, will have overall responsibility for this policy and any exceptions must be approved by the Vice President, Mine Support Services
2. Supervisors are responsible to ensure that they understand and comply with this policy.
3. Employees and contractors will be responsible for complying with this policy and notifying their Supervisor as soon as reasonably possible of a possible discovery.

POLICY

The potential archeological, paleontological, and historic resources situated within VIT's Eagle Gold Project footprint and mineral exploration claims are part of the Heritage Resources that helps trace the history of the First Nation of Na-Cho Nyak Dun (FNNND), Yukon citizens and defines their history. Preserving this heritage is critical and VIT is committed to acting as an exemplary leader in any involvement with the protection of Heritage Resources.

Heritage Resources are sites or objects of scientific or cultural value due to their archaeological, paleontological, ethnological, prehistoric, historic, or aesthetic features. There are three types of Heritage Resources.

Pre-contact archaeological sites and artifacts include the remains resulting from the occupation of the Yukon by Aboriginal people before contact with European traders. These can include artifacts such as stone tools, butchered bones.

Historic sites which can be Aboriginal or non-Aboriginal, and date from the time of European contact until 45 years ago. Historic sites include structures such as cabins, grave and camp sites, industrial and folk-manufactured items made of glass or metal.

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Department:	Mine Support Services	Document No.:	VGC-MSS-CA-OP-0002

Paleontological resources, or fossils, are the remains that indicate the existence of extinct or prehistoric plants or animals.

All Heritage Resources are protected under the *Yukon Historic Resources Act*. It is illegal to search for, remove, or destroy heritage sites or artifacts unless proper authorization has been received to do so.

HERITAGE RESOURCE FIELD GUIDELINES

IF VIT employees or contractors come upon evidence of past human occupation, such as cabins, camps, caches (platform or ground caches) and other subsistence features such as trails, trail markers or artifact's such as arrow, spear points, stone flakes, fossilized material or bones;

- **STOP** work immediately in area.
- **NOTIFY** the onsite manager or Environmental Coordinator.
- **DO NOT DISTURB** the site.
- **CONTACT** the Environmental Manager. This will be done by the onsite Manager or Environmental Coordinator. The Environmental Manager or delegate will contact the FNNND Environmental Monitor and the Yukon Department of Tourism and Culture Archaeology Branch or if the discovery be should be human remains or a burial site the RCMP will be contacted immediately.

Work will not resume until direction is given from the Site Manager

REPORTING REQUIRMENTS

Immediately after a heritage resource discovery, the Eagle Gold Project Fossil and Artifact Discovery Record will be completed by the individual who made the discovery and the onsite Manager or Environmental Coordinator.

VIT will work cooperatively with the relevant agency(s) noted above to ensure the discovery is managed appropriately and that artifacts that may have a heritage value are protected and that work in the area does not resume until a satisfactory conclusion has been reached.

REFERENCES


Yukon Mineral Exploration Best Management Practices for Heritage Resources, Heritage Resources Unit, Government of Yukon, February 2010
 Heritage Resource Protection Plan, Eagle Gold Project, March, 2013

REVISION HISTORY

Noted below is the revision history of this document.

Revision	Date	Comments

All staff members are responsible for ensuring that they are using the latest version of this document.

	ADMINISTRATION POLICY AND PROCEDURE		
	OCCUPATIONAL HEALTH & SAFETY POLICY STATEMENT		
Department:	Administration	Document No.:	OHS - 1
Effective Date:	December 13, 2010	Replaces:	
Approved:	Victoria Executive Committee		

We respect our employees, the environment, and the communities in which we operate.

The Victoria Group of Companies (Victoria Group) is committed to the health and safety of its employees and visitors in our work places. Protection from injury and providing an environment conducive to the maintenance of good health are primary objectives of our business. All our employees are expected to commit to these objectives and strive to eliminate all injuries in our workplaces.

Victoria Group will achieve these objectives by:

- providing the necessary resources (equipment, people, training and funding);
- assessing and managing risks to all individuals on our work sites;
- ensuring compliance with all legislation;
- developing appropriate health and safety programs;
- ongoing reviews of safety and health programs to ensure effectiveness; and
- providing working environments which support our health and safety programs.

Management including contractors is accountable for:



- assessing and managing workplace hazards;
- ensuring that equipment and workplaces are maintained in safe condition;
- ensuring that employees work in compliance with regulations, approved policies & procedures;
- ensuring that employees have adequate training to safely complete their work tasks; and
- implementing effective emergency preparedness systems.

All employees are accountable for their own safety and for the safety of their fellow workers and must ensure they comply with all safety and health regulations, policies, procedures and instructions.

Minimizing injuries and the maintenance of good health is the joint responsibility of our management and employees.

“Victoria Group of Companies” includes Victoria Gold Corp. and all of its subsidiaries.

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	POLICY		
	Site and Project General Rules		
Department:	Mine Support Services	Document No.:	VGC-MSS-HSC-OP-0002
Section:	Safety, Health & Compliance	Effective Date:	July 1, 2012
Revision:	N/A	Replaces:	N/A
Approved:	John McConnell – President & CEO 		

PURPOSE

The purpose of this Policy is to ensure that all personnel at all Victoria Gold Corp. (VIT) remote work sites and projects understand and comply with the “Victoria Gold Corp’s General Rules” as listed below.

SCOPE

This policy applies to all employees, contractors, guests and visitors at any VIT remote work or project site.

RESPONSIBILITY

1. The Vice President, Mine Support Services, will have overall responsibility for this policy and any exceptions must be approved by the Vice President Mine Support Services.
2. All employees, contractors, visitors, and guests must understand and comply with this policy.
3. Supervisors are responsible to ensure that employees, visitors and guests are aware and understand this policy.

POLICY

As the safety and health of all those who work at or visit our remote project or work sites, as well as the protection of the environment, is of paramount concern, VIT has established general rules to guide activities and behaviours. All individuals who work on any remote VIT work site/project **must**:

- wear the required and appropriate PPE for the activity;
- smoke only in authorized areas;
- not work at heights above three (3) meters without approved fall protection;
- not work under a suspended load;
- not conduct work that they are not qualified or trained to perform. Individuals shall only perform tasks for which they have been successfully trained;
- not perform work that is unsafe;
- follow approved confined space and excavation procedures;
- not possess or consume alcohol and/or any controlled substances;
- treat all individuals with dignity and respect. Harassment or discrimination are not acceptable and will not be tolerated;
- not steal or damage the property of others or VIT;
- practice good housekeeping at all times;

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Department:	Mine Support Services	Document No.:	VGC-MSS-HSC-OP-0002

- dispose of litter appropriately (food waste, cigarette butts etc.);
- conduct themselves professionally (no horseplay, roughhousing, fighting or acting aggressively);
- not tamper with any safety equipment, including medical/first aid supplies;
- report all accidents, incidents, hazards, or other concerns to their immediate supervisor;
- not bring firearms or projectile weapons of any type onto the site;
- not hunt, fish, trap, harvest or harass wildlife;
- obey all signs restricting access; and
- comply with tag-out/lock-out system,

DEFINITIONS

N/A

REFERENCES



N/A

REVISION HISTORY

Noted below is the revision history of this document.

Revision	Date	Comments

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		POLICY	
		Safe Work Practices	
Department:	Mine Support Services	Document No.:	VGC-MSS-HSC-OP-0007
Section :	Safety, Health & Compliance	Effective Date:	August 1, 2012
Revision:	N/A	Replaces:	N/A
Approved:	John McConnell – President & CEO 		

PURPOSE

The purpose of this Policy is to clearly outline the tools to be used at Victoria Gold Corp. (VIT) to ensure work is conducted in the safest manner possible.

SCOPE

This policy applies to all employees, contractors, or anyone conducting work at a VIT site or project.

RESPONSIBILITIES

1. The Vice President, Mine Support Services, will have overall responsibility for this policy and any exceptions must be approved by the Vice President Mine Support Services
2. All employees, contractors, visitors, and guests must understand and comply with this policy.
3. Supervisors are responsible to ensure that employees, visitors and guests are informed on this policy.

POLICY

VIT is committed to the health and safety of its employees and contractors in our work places. Protection from injury and providing an environment conducive to the maintenance of good health are primary objectives of our business. All our employees are expected to commit to these objectives and strive to eliminate all injuries in our workplaces.

Excellence in health and safety at our Projects or Sites can only be achieved through the actions of VIT employees and contractors. To ensure that health and safety risks are removed and/or mitigated to the degree possible, we will use four common tools – Job Hazard Analysis (JHA), Safe Work Plans (SWP), Standard Operating Procedure (SOP) and Accident/Incident Reporting (A/I) at all locations.

Safe Work Plan

Safe Work Plans (SWP) are written administrative controls used to plan and direct work being performed. They describe how to perform a task from start to finish in the correct and safest possible manner.

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A SWP will be developed when a non-routine work situation is encountered that exceeds normal exposures for a specific task. (e.g. Replacing a washed-out culvert due spring snow melt.)

In the event that a SWP is required, the Supervisor and Site Manager (or designates) will review the requirements of the task and will develop a SWP with all employees involved. Each employee will sign a sheet indicating that they understand and will comply with the requirements of the SWP.

Standard Operating Procedures, based on industry standards, will be practiced if an SWP is not required.

Standard Operating Procedure

A Standard Operating Procedure (SOP) is a set of written instructions that document a routine or repetitive activity performed by VIT employees and contractors that complies with VIT's policies and relevant regulatory standards. (e.g. the steps required to safely perform routine maintenance of a roadway).

A SOP will be developed by a suitably qualified and experienced supervisor and will outline the workers' roles and responsibilities for doing the job correctly and safely. The SOP will clearly describe the sequence of work, including preparation and organization, what proper protective equipment, tools, materials and ancillary equipment is required and proper task execution. The SOP will also address any potentially hazardous environmental exposures and establish mitigation procedures. Unlike SWPs and JHAs, SOPs will be reviewed and approved by VIT Senior management and reviewed annually for accuracy.

Standard Operating Procedures are required to be communicated to all workers for all routine tasks. They should always be written and communicated to all workers.

Job Hazard Analysis

A Job Hazard Analysis (JHA) will be performed to identify potential hazards prior to commencing a task. (e.g. Unloading heavy equipment off a flatbed trailer)

The JHA focuses on the interactions between the worker, task, equipment, tools and work environment. Once hazards are identified, the supervisor and worker(s) will take steps to eliminate or mitigate the hazard.

JHA's are conducted both formally and informally and can include a walk around of the work area, a visual inspection of the work area, or follow a more formal checklist. The intent is for the individual to identify any hazards that may prevent them from completing the task safely. JHA's should be completed each time a new task is started, a work location is changed, or something changes from the original task.

JHA's are completed repetitively on the same task. For example, an individual who on a daily basis, spends one hour in the core shack, must each time they enter the building do a JHA to ensure that there are no hazards (tripping, loose material etc.) They are also conducted on routine tasks to ensure that no unknown hazard exists. For example, a mechanic may be going to complete an engine change on a piece of equipment. Prior to starting the job, a JHA is

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conducted to see if there are any hazards that may cause damage or injury to the mechanic or anyone in the work area. (i.e any risk that might be present while working on that new piece of equipment used for road construction.)

All JHA's and associated practice(s) must be reviewed with crews for accuracy before initial implementation and are the first step in creating a Safe Operating Plan.

It is imperative that JHA's are followed and reviewed prior to starting any task with all those involved.

Accident and Incident Reporting

In order to ensure that we learn from previous incidents and/or accidents, including near misses, understand the root cause and to prevent reoccurrence, Accident/Incident Investigations (A/I) will be completed on all incidents, accidents and near misses that result in injury or property damage, or that could have resulted in injury or property damage. Near miss occurrences that occur in the workplace have the potential to be a serious accident will be investigated

A/I investigations must be completed as soon as possible after the incident/accident and initial reports should be circulated within 24 hours. Depending on the severity of the accident/incident a more comprehensive report may be required to be completed. All accidents involving personal injury that may result in lost time are to be reported immediately to the VP Mine Support Services who will then communicate the details COO and relevant VPs. Written incident reports will then follow within 24hours of occurrence.

DEFINITIONS

Hazard - A hazard is the potential for harm to individuals or may result in property damage. In practical terms, a hazard often is associated with a condition or activity that, is not mitigated, may result in injury, illness or property damage.

REFERENCES

FORMS

Safe Work Plan (SWP)
Standard Operating Procedure (SOP)
Job Hazard Analysis (JHA)

REVISION HISTORY

Noted below is the revision history of this document.

Revision	Date	Comments

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APPENDIX B
Eagle Gold Spill Report Form

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EAGLE GOLD PROJECT SPILL RESPONSE FORM



Name (first observer):		Department:	
Date of spill:		Time of spill:	
Location of spill:		Site conditions (temperature, wind, precipitations, etc.):	
Photos: please list & append			
Safety hazards identified (Fire, explosive substance, etc.):			
Substance spilled:			
Estimated volume of spill (Liters or kilograms):			
Cause of spill (Equipment malfunction, vehicle accident, etc.)			
Environmental areas affected (watercourse, soil, wetland, etc.)			
Containment actions taken:			
Disposal method and location:			
Samples taken:			
Further actions required:			
Supervisor reported to:			
Is the Spill Reportable		Who was it reported to?	

APPENDIX C

Reportable Spill Thresholds

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Reportable Spill Thresholds, Personal Protective Equipment and Clean-up Method by Substance

Substance Name	Type	TDGA Class	Reportable Threshold	PPE required for Spill Response	Cleanup or disposal method
Mining explosives (ANFO)	Blasting compound	1	Any amount	Impervious butyl rubber gloves, safety goggles, respirator in cases of reduced ventilation work sites.	All cleanup and disposal is to be directed by the site blasters. Avoid use of metals tools containing iron and/or copper and avoid shock and friction. Contain and collect spillage with inert sorbents. Collect contaminated soil, water and sorbents for disposal by blasting contractor.
Propane	Petroleum product	2	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error, or deliberate action or inaction	Insulated gloves, safety glasses, respirator if there is a possible of oxygen reduction (confined spaces with poor ventilation)	Shut off flow and remove ignition sources if safe to do so and evacuate area. Consult supplier if container needs disposal.
Acetylene	Petroleum product	2	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error, or deliberate action or inaction	Insulated gloves, safety glasses, respirator	Shut off flow and remove ignition sources if safe to do so and evacuate area. Consult supplier if container needs disposal.
Oxygen	Gas	2	Any amount of gas from a container larger than 100 L, or where the spill results from equipment failure, error, or deliberate action or inaction	Insulated gloves, safety glasses	Allow gas to dissipate. Consult supplier if container needs disposal.
Chlorine gas liberated from HCl use	Reagent	2	Any amount	Chemical-resistant impervious gloves, safety glasses, respirator	Evacuate area. Consult supplier if container needs disposal.
Gasoline	Petroleum product	3	200 L (any amount if spilled into a watercourse)	Chemical-resistant impervious gloves, safety glasses, respirator if ventilation is inadequate	Approach from upwind, contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Dispose of liquid in waste oil burner and materials in Land Treatment Facility.
Diesel	Petroleum product	3	200 L (any amount if spilled into a watercourse)	Chemical-resistant impervious gloves, safety glasses	Approach from upwind and contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Dispose of liquid in waste oil burner and materials in Land Treatment Facility.
Jet A & B Aviation Fuel	Petroleum Product	3	200 L (any amount if spilled into a watercourse)	Chemical resistant gloves, safety glasses	Use sorbents, pump free liquid into containment. Dispose of in Land Treatment Facility.
Hydrogen Peroxide	Reagent	5	1 kg or 1 L	Chemical-resistant impervious gloves, safety glasses, respirator, full suit	For small spill dilute with water and mop up or use sorbents from spill kit. For large spill absorb with DRY earth, sand or other non-combustible material. Excavate spilled material and sorbents and dispose of in special waste disposal container.
Sodium cyanide	Reagent	6	5 Kg	Splash goggles, TECP suit, SCBA, chemical resistant gloves	Avoid adding any water source, sweep up dry materials and contain, flush area with dilute sodium hypochlorite. Dispose of in special waste disposal container.

Reportable Spill Thresholds, Personal Protective Equipment and Clean-up Method by Substance

Substance Name	Type	TDGA Class	Reportable Threshold	PPE required for Spill Response	Cleanup or disposal method
Antiscalant – leaching circuit	Solvent	8	5 kg or 5 L	Chemical-resistant impervious gloves, safety glasses	Contain and collect spillage with sorbents from spill kit. Pump free liquid into containment. Excavate spilled solid and dispose of in special waste disposal container.
Hydrochloric acid	Reagent	8	5 L	Face shield, full suit, vapor respirator, chemical-resistant gloves	For small spill dilute with water and mop up or absorb with an inert dry material. For large spills, absorb with dry earth, or other non-combustible material. Do not get water inside container and do not touch spilled material. Excavate spilled material and sorbents and dispose of in special waste disposal container.
Sodium hydroxide	Reagent	8	5 L or 5 Kg	Goggles, synthetic apron, vapor and dust respirator, chemical-resistant gloves	Use appropriate tools to put the spilled solid in a special waste disposal container. Ventilate area and wash spill site after material collection is complete.
Sodium hypochlorite	Reagent	8	5 L or 5 Kg	Chemical resistant gloves, safety glasses	Contain and dilute with water. Pump free liquid into containment and dispose of in special waste disposal container.
Sulfuric acid	Reagent	8	5 L	Face shield and respirator or SCBA for large spills, full suit, chemical resistant gloves, safety glasses	Dilute small spills with water and neutralize with lime. Remove contaminated material and dispose of in special waste disposal container.
Antifreeze	Solvent	9	5 L	Chemical-resistant impervious gloves, safety glasses	Approach from upwind, contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment.
Copper sulfate pentahydrate	Reagent	9	5 kg	Chemical-resistant impervious gloves, safety glasses, respirator, full suit in the event of a large spill	Excavate spilled solid and dispose of in special waste disposal container. Finish cleanup by spreading water on contaminated surface, excavate residual wetted material and dispose of in special waste disposal container.
Lubricating and Hydraulic Oils	Lubricating oil	n/a	200 L (any amount if spilled into a watercourse)	Chemical-resistant gloves, safety glasses.	Approach from upwind, contain and collect spillage with sorbents from spill kits and/or sand and gravel. Pump free liquid into containment. Dispose of liquid in waste oil burner and materials in Land Treatment Facility.

APPENDIX D
Spill Response Emergency Contact
Numbers

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EAGLE GOLD PROJECT SPILL RESPONSE EMERGENCY CONTACT NUMBERS



Resource	Position/Division	Contact Number
Yukon Government - Environment	Spill Report Centre	867-667-7244
Eagle Gold Mine Site	Site Manager	Office 778-372-2758 Ext. 2004 Cell 778-786-0212
StrataGold Corporation	VP Mine Support Services	Office 604-696-6604 Cell 604-355-9667
StrataGold Corporation	Project Manager	Office 604-696-6618 Cell 604-356-0693
StrataGold Corporation	Environmental Manager	Office 867-393-4653 Ext. 101 Cell 867-334-2655
StrataGold Corporation	Lands & Permitting Manager	Office 604-696-6600 Cell 604-349-6469
Transport Canada	CANUTEC 24-hour service	613-996-6666 or *666 on a cellular phone
Yukon Government – Energy, Mines and Resources	Client Services and Inspections – Mayo	867-996-2568
Yukon Government – Energy, Mines and Resources	Client Services and Inspections – Whitehorse	867-456-3209
Mayo Nursing Station		867-996-4444
Mayo Fire & Rescue		867-996-2222
Mayo RCMP		Emergency: 867-996-5555 Admin: 867-996-2677
Yukon Government - Environment	Conservation	867-996-2202
Fisheries and Oceans Canada		867-393-6722