



Nationaal Instituut Milieu & Ontwikkeling Suriname
Attn: Quan Tjon A Kon
Paramaribo, Suriname

Subject: Surgold response to comments on revised ESIA for the Merian Project

27 December 2012

Geachte mijnheer Tjon A Kon,

Surgold acknowledges receipt of NIMOS comments on the revised ESIA for the Merian Project. Comments were received on December 17th, and an email response was provided by Surgold on that same day. The purpose of this letter is to formally accept the comments and to provide statements of commitments as well as the proposed schedule for addressing the different comments. Please see below for specific responses to the different comments provided by NIMOS:

Table of Concordance: NIMOS provided a general comment and no additional response by Surgold is required.

Table of Commitments: NIMOS has requested that this table will be an important reference document for the project and has requested that the table be reviewed and updated so that it captures all commitments, including those in the Water Management Plan and the Closure and Reclamation Plan. ERM is working on completing this update and has indicated that a completion of the update can be accomplished by the end of January 2013. The revised document will then be provided to NIMOS.

Environmental and Social Monitoring Plan (ESMP): NIMOS has requested, per the original comment by Hatfield reviewers, that a more formal monitoring plan be provided for the project. As noted by NIMOS, there is reference to monitoring in several of the discipline-specific management plans, but a comprehensive monitoring plan is still needed. As suggested by NIMOS, Surgold has requested ERM to re-name the ESMP to the ESMMP (to include monitoring). ERM is completing this change, including more description of monitoring in the relevant management plans and has indicated that a completion of the update can be accomplished by the end of January 2013. The revised document will then be provided to NIMOS.

Surgold also commits to providing a more comprehensive Environmental Monitoring Plan to NIMOS within two months of the approval of the project.

The List of On-going Environmental Studies: NIMOS has requested additional description of the ongoing and planned work be provided. Surgold will work with ERM and Golder Associates to revise the table that was provided to NIMOS in November so that it provides additional detail. Surgold proposes that the revised table be provided to NIMOS by January 21, 2013.

ISO 14001 EMS Certification: NIMOS has requested if the project will achieve ISO14001 certification.

Surgold is committed to achieving certification of the project and will undergo an initial compliance audit within three years of the start of operations and then annual third-party audits of the management system as required for certification under ISO14001.

ESIA Corrections: NIMOS has listed some specific corrections in the ESIA that should be made. Surgold acknowledges these, and has requested that ERM make the needed corrections, as well as complete an additional review of the document for other editorial corrections. Submittal of the final ESIA in both an electronic and hardcopy format is proposed for early February, after the review by NIMOS of updates to the Table of Commitments and the ESMP. Surgold is also committed to posting the final ESIA on the merianproject.com website.

Comments on the Environmental and Social Monitoring Plan : NIMOS provided to specific comments on the ESMP. The comment and response are listed below:

Comment: Page 10-4, Table 10.1 m.b.t. Waste Management: For many of the mentioned waste streams (paints and solvents, electronic equipment, etc.) there are no processing facilities in Suriname. How will this be managed? Will the material be shipped away:

Surgold response: The update of the ESMP will review the different waste streams and as needed will be updated to reflect the management plan if there are not appropriate facilities within Suriname.

Comment: Blz. 11-2, 11.2.2 Commitments: Has Surgold signed the International Cyanide Management Code or will it be signed in the future.

Surgold response: Newmont is signatory to the International Cyanide Management Code (Code) and requires all of the mines that are majority owned and operated by Newmont to become fully compliant and certified under the Code. This includes the Merian project, which will undergo third-party certification audits every 3 years, as required by the Code.

Surgold appreciates the continued positive working relationship that has been developed with NIMOS, and will strive to address the comments provided on the revised ESIA in a timely and effective manner. Please contact me with any concerns or questions on the responses provided in this communication.

Regards



Mike Meyer
Surgold

cc: Matt King
Adriaan van Kersen
Louie Gignac
David Buras