

TRA ANNUAL REPORT (2019 Reporting Year)

This *Toxics Reduction Act* (TRA) Annual Report has been prepared in accordance with, and satisfies the requirements of, Section 10 of the *Toxics Reduction Act* (TRA) and Section 27 of Ontario Regulation (O.Reg.) 455/09 for the TRA toxic substances identified in the table below.

Basic Facility Information

Mandatory Basic Facility Information Item	Details
<p>Substance Name and Chemical Abstracts Service (CAS) Registry Number for the Substances whose Toxic Substance Reduction Plans are covered by this Report on Toxic Substance Reduction Plans</p>	<p>This TRA Annual Report applies to the Toxic Substance Reduction Plans for the following prescribed Toxic Substance: Nitric Acid [CAS number 7647-01-0], Arsenic*, Cadmium*, Chromium*, Cobalt*, Copper*, Lead*, Manganese*, Nickel*, Selenium*, Vanadium [CAS number 7440-62-2], Zinc*, Cyanides (Ionic)*, Particulate Matter*, PM-10*, PM-2.5* *Per O.Reg.455/09, "no single CAS numbers apply to these substances"</p>
<p>National Pollutant Release Inventory (NPRI) and O.Reg.127/01 Identification Numbers</p>	<p>NPRI ID: 11743</p>
<p>The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different</p>	<p>McEwen Mining Inc. 5300 Hwy 101 Highway East, Matheson</p>
<p>The number of full time employee equivalents at the facility</p>	<p>38</p>
<p>The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code</p>	<p>21 – Mining & Oil & Gas Extraction 2122 – Metal Ore Mining 212220 – Gold & Silver Ore Mining</p>
<p>Public contact</p>	<p>Harri Ollila Environmental Superintendent hollila@mcewenmining.com 705-273-1727 ext. 296</p>
<p>The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum</p>	<p>Zone 17 540765 5353126</p>

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Arsenic*

Cadmium*

Chromium*

Cobalt*

Copper*

Lead*

Manganese*

Nickel*

Selenium*

Vanadium [CAS number 7440-62-2]

Zinc*

Cyanides (Ionic)*

Nitric Acid [CAS number 7647-01-0]

Particulate Matter*

PM-10*

PM-2.5*

*Per O.Reg.455/09, "no single CAS numbers apply to these substances"

Toxic Substance Accounting Information

Refer to Appendix A: TRA Toxic Substance Quantification and Accounting Summary for the information required under s.12(1) of O.Reg.455/09. Note that Selenium did not meet its reporting threshold for 2019 and therefore no reporting information is required.

Comparison of Toxic Substance Accounting to the Previous Calendar Year

Refer to Appendix B: Comparison of Toxic Substance Quantification and Accounting to the Previous Calendar Year for the information required by s.26(2) of O.Reg.455/09. Note that Selenium did not meet its reporting threshold for 2017, 2018 or 2019 and therefore no reporting information is required.

Changes in Quantification Methods

It is the Facility's understanding that there were no changes made to any quantification methods since the preparation of the Toxic Substance accounting information for the previous calendar year.

Objectives of Toxic Substance Reduction Plans

Refer to Appendix C: Toxic Substance Reduction Plan Objectives for the objectives of the Toxic Substance Reduction Plans covered by this Report, as required by s.26(2)3 of O.Reg. 455/09.

Toxic Substance Reduction Options Identified in Toxic Substance Reduction Plans

No toxic substance reduction options were identified in any of the respective Plans and therefore the information required by s.26(2)4, s.26(2)5 and s.26(2)6 is not applicable for this Report.

Amendments to Toxic Substance Reduction Plans

On April 18, 2019, the Ministry of the Environment, Conservation and Parks announced a Regulation Decision Notice on the Environmental Registry of Ontario (ERO number 013-4235) which indicated that facilities are no longer required to review existing plans.

No amendments have been made in the previous calendar year to any of the Toxic Substance Reduction Plans for the Toxic Substances covered in this Annual Report.

Certification Statement

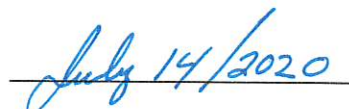
As of July 31, 2020, I certify that I have read the Report on the toxic substance reduction plans for the substances listed below and am familiar with its content and to my knowledge the information contained in the Report is factually accurate and the Report complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

Nitric Acid [CAS number 7647-01-0], Arsenic*, Cadmium*, Chromium*, Cobalt*, Copper*, Lead*, Manganese*, Nickel*, Selenium*, Vanadium [CAS number 7440-62-2], Zinc*, Particulate Matter*, PM-10*, PM-2.5*, Cyanides (Ionic)*

*Per O.Reg.455/09, "no single CAS numbers apply to these substances"



Signature



Date

APPENDIX A: TRA TOXIC SUBSTANCE QUANTIFICATION AND ACCOUNTING SUMMARY

TRA Toxic Substance Quantification and Accounting Summary

The worksheets to the right of this tab were used to determine the quantities below which are reportable to the TRA and to the public in the public report.

Toxic Substance	CAS No.*	Public Reportable Values (Report to Public)			
		Unit	Use	Creation	Contained in Product
Arsenic	N/A-2	kg	>10,000 to 100,000	>0 to 1	>0 to 1
Chromium	N/A-4	tonnes	>100 to 1000	>0 to 1	>0 to 1
Cobalt	N/A-5	kg	>10,000 to 100,000	>0 to 1	>0 to 1
Copper	N/A-6	tonnes	>10 to 100	>0 to 1	>0 to 1
Lead	N/A-8	kg	>1000 to 10,000	>0 to 1	>0 to 1
Manganese	N/A-9	tonnes	>100 to 1000	>0 to 1	>0 to 1
Nickel	N/A-10	tonnes	>100 to 1000	>0 to 1	>0 to 1
Vanadium	7440-62-2	tonnes	>10 to 100	>0 to 1	>0 to 1
Zinc	N/A-14	tonnes	>10 to 100	>0 to 1	>0 to 1
Cadmium	N/A-3	kg	>10 to 100	>0 to 1	>0 to 1
Cyanides	N/A-7	tonnes	>10 to 100	>0 to 1	>0 to 1
Nitric Acid	7697-37-2	tonnes	>10 to 100	>0 to 1	>0 to 1
PM	N/A - M06	tonnes	>0 to 1	>10 to 100	>0 to 1
PM-10	N/A - M09	tonnes	>0 to 1	>10 to 100	>0 to 1
PM-2.5	N/A - M10	tonnes	>0 to 1	>1 to 10	>0 to 1

* Substances with CAS Numbers starting with "N/A" do not have CAS Numbers in NPRI or TRA guidance. The CAS Numbers assigned to those substances are arbitrary

Notes:

- the substance Selenium did not trigger its reporting threshold for the Reporting Year and therefore no reporting information is required for this substance.
- As per "UPR" tab, total vehicle kilometres travelled were less than 10,000 for 2019 and therefore road emissions are not reportable as per NPRI guidance and not included in the total.
- Nitric Acid is below the reporting threshold for 2019 however it is being voluntarily reported

**APPENDIX B: COMPARISON OF TOXIC SUBSTANCE QUANTIFICATION AND ACCOUNTING TO
THE PREVIOUS CALENDAR YEAR**

TRA Reporting Comparison

Used

Substances	CAS No.	Reporting Units	Reportable Value for 2019	Reported Value for 2018	% Change	Comment if Change > 10%	
Arsenic	N/A-2	kg	31,935,160	38,783,093	-20%	>20% less ore was used onsite at the mill in 2018 compared to 2018.	
Chromium	N/A-4	tonnes	141,336	178,762	-20%		
Cobalt	N/A-5	kg	10,277,659	12,824,460	-20%		
Copper	N/A-6	tonnes	21,462	26,821	-20%		
Lead	N/A-8	kg	2,690,715	3,352,134	-20%		
Manganese	N/A-9	tonnes	232,990	291,238	-20%		
Nickel	N/A-10	tonnes	127,493	159,495	-20%		
Vanadium	7440-62-2	tonnes	21,522	27,427	-20%		
Zinc	N/A-14	tonnes	10,483	13,119	-20%		
Cadmium	N/A-3	kg	29,005	48,770	-20%		
Cyanides	N/A-7	tonnes	41,940	39,810	5%		
Nitric Acid ¹	7697-37-2	tonnes	3,751	38,790	-84%		Nitric acid usage in 2018 was 84% less than the usage in 2019.
PM	N/A - M08	tonnes	0.000	0.000	---		
PM-10	N/A - M09	tonnes	0.000	0.000	---		
PM-2.5	N/A - M10	tonnes	0.000	0.000	---		

¹Below reporting threshold for 2019 however being reported voluntarily

Created

Substances	CAS No.	Reporting Units	Reportable Value for 2019	Reported Value for 2018	% Change	Comment if Change > 10%
Arsenic	N/A-2	kg	0.000	0.000	---	
Chromium	N/A-4	tonnes	0.000	0.000	---	
Cobalt	N/A-5	kg	0.000	0.000	---	
Copper	N/A-6	tonnes	0.000	0.000	---	
Lead	N/A-8	kg	0.000	0.000	---	
Manganese	N/A-9	tonnes	0.000	0.000	---	
Nickel	N/A-10	tonnes	0.000	0.000	---	
Vanadium	7440-62-2	tonnes	0.000	0.000	---	
Zinc	N/A-14	tonnes	0.000	0.000	---	
Cadmium	N/A-3	kg	0.000	0.000	---	
Cyanides	N/A-7	tonnes	0.000	0.000	---	
Nitric Acid ¹	7697-37-2	tonnes	0.000	0.000	---	
PM	N/A - M08	tonnes	6,224	27,896	-78%	Road emissions were below the VKT threshold, there for these emissions were not created.
PM-10	N/A - M09	tonnes	3,182	10,443	-70%	Road emissions were below the VKT threshold, there for these emissions were not created.
PM-2.5	N/A - M10	tonnes	1,328	2,920	-54%	Road emissions were below the VKT threshold, there for these emissions were not created.

¹Below reporting threshold for 2019 however being reported voluntarily

Contained in Product

Substances	CAS No.	Reporting Units	Reportable Value for 2019	Reported Value for 2018	% Change	Comment if Change > 10%
Arsenic	N/A-2	kg	0.000	390,280	-100%	No "clean" waste rock treatment onsite
Chromium	N/A-4	tonnes	0.000	0.000	---	
Cobalt	N/A-5	kg	0.000	0.000	---	
Copper	N/A-6	tonnes	0.000	0.000	---	
Lead	N/A-8	kg	0.000	0.000	---	
Manganese	N/A-9	tonnes	0.000	0.000	---	
Nickel	N/A-10	tonnes	0.000	0.000	---	
Vanadium	7440-62-2	tonnes	0.000	0.000	---	
Zinc	N/A-14	tonnes	0.000	0.000	---	
Cadmium	N/A-3	kg	0.000	0.000	---	
Cyanides	N/A-7	tonnes	0.000	0.000	---	
Nitric Acid ¹	7697-37-2	tonnes	0.000	0.000	---	
PM	N/A - M08	tonnes	0.000	0.000	---	
PM-10	N/A - M09	tonnes	0.000	0.000	---	
PM-2.5	N/A - M10	tonnes	0.000	0.000	---	

¹Below reporting threshold for 2019 however being reported voluntarily

APPENDIX C: TOXIC SUBSTANCE REDUCTION PLAN OBJECTIVES

TOXIC SUBSTANCE REDUCTION PLAN OBJECTIVES

The following are plan objectives taken from respective Toxic Substance Reduction Plans. This information is included in this Report on Plans in order to satisfy s.26(2)3 of O.Reg.455/09.

Arsenic, Cadmium, Chromium, Cobalt, Copper, Lead, Manganese, Nickel, Selenium, Vanadium, Zinc

Brigus does not intend to reduce its use of arsenic, cadmium, chromium, cobalt, copper, lead, manganese, nickel, selenium, vanadium and zinc because these substances are by-products of production, naturally occurring in ore from which gold is extracted and reducing their use would not benefit business growth, but Brigus is committed to ensuring their processing, emission and disposal are handled in a safe and responsible manner. While Brigus does not intend to reduce the use of the aforementioned metals, technologies that may reduce the releases of these substances will be monitored and considered for implementation if proven technically and economically feasible.

Nitric Acid

Brigus is committed to playing a leadership role in protecting the environment. Wherever feasible, Brigus will eliminate or reduce the use and creation of nitric acid in full compliance with all federal and provincial regulations.

Particulate Matter, PM-10, PM-2.5

Brigus is committed to playing a leadership role in protecting the environment. Wherever feasible, Brigus will eliminate or reduce the use and creation of particulate matter in full compliance with all federal and provincial regulations.

Cyanides (Ionic)

The objectives of this Plan are as follows:

- provide support for the Facility's position with respect to the Statement of Intent of this Plan; and
- document how, by preparing this Plan, the Facility has fulfilled the applicable requirements under the TRA and O.Reg.455/09 with respect to the Toxic Substance.

*Note: Brigus Gold is now McEwen Mining Inc.