



NIRB File No.: 12MN036
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June 20, 2023

To: Merle Keefe
Sabina Gold & Silver Corp
Suite 202-930 West 1st St.
Vancouver, BC, V7B 3N4

Sent via email: mkeefe@sabinagoldsilver.com

Re: Receipt of Technical Review Comment Submissions for the NIRB's Assessment of Sabina Gold and Silver Corp's "Back River Project Energy Centre" Project Proposal

Dear Merle Keefe:

On March 22, 2023, the Nunavut Impact Review Board (NIRB or Board) initiated the public technical review of the Final Environmental Impact Statement Addendum (FEIS Addendum) submitted by Sabina Gold and Silver Corp. (Sabina) for the "Back River Project Energy Centre" project proposal. Following the receipt of Sabina's response to initial Information Requests (IRs) received from parties on May 15, 2023, the NIRB invited responsible authorities, interested parties, and those with specialist advice to provide the Board with technical review comments regarding the FEIS Addendum by June 15, 2023.

On or before June 15, 2023, the NIRB received technical review comment submissions from the following parties:

Party	Document ID No.
Kitikmeot Inuit Association (KIA)	345698
Government of Nunavut (GN)	345700
Government of Canada (GoC)	345697
Athabasca Denesūliné Né Né Land Corporation (ADNLC)	345699
Government of Northwest Territories (GNWT-ECC)	345696

All documentation associated with the "Back River Project Energy Centre" project proposal, including technical review comment submissions, can be accessed via the NIRB's public registry at www.nirb.ca/project/125740 or by searching for the above Document ID numbers.

Following a review of parties' technical review comment submissions to the Board, the NIRB is also providing one (1) additional technical review comments directed to Sabina for its consideration and response (see [Appendix A](#)).

The NIRB offers Sabina an opportunity to provide an overview response to the technical review comment submissions to facilitate discussions at the upcoming Technical Meeting (date to be determined). The NIRB has budgeted time during the Technical Meeting for Sabina to present its response to parties' technical review comments with a focus on outstanding items requiring discussion.

Sabina's response should briefly outline its understanding of the main issues raised in the technical review comments and its proposed plans to address and resolve these issues and related concerns. Sabina and other parties are reminded to provide responses or an indication of plans to satisfy any IRs where a response was deferred to a later stage of the assessment process (*i.e.* technical review, technical meeting, or the licensing/permitting/authorization phase).

The responses to technical review comments should be submitted along with a *draft* list of commitments. Sabina will be responsible for tracking any commitments made to address outstanding technical issues and maintaining a comprehensive listing of commitments.

The Board respectfully requests that Sabina provide its response to technical review comments, as well as a *draft* list of commitments, to the NIRB at info@nirb.ca on or before **July 4, 2023**.

If you have any questions regarding the NIRB's assessment of the "Back River Project Energy Centre" project proposal, please contact Guillaume Daoust (867) 983-4609 or gdaoust@nirb.ca or the undersigned directly at kmorrison@nirb.ca or (867) 983-4617.

Sincerely,



Keith Morrison
Manager, Impact Assessment
Nunavut Impact Review Board

cc: Back River Distribution List
Mathew Picard, Sabina Gold and Silver Corp.

**APPENDIX A: NIRB TECHNICAL REVIEW COMMENTS TO SABINA GOLD AND SILVER CORP.
FOR THE “BACK RIVER PROJECT ENERGY CENTRE” PROJECT PROPOSAL**

TRC #:	NIRB-001
To:	Sabina Gold and Silver Corp.
Subject:	Caribou Stress Hormone Study
Reference(s):	Wildlife Management and Mitigation Plan (Version 12), section 7.2.2.3
Summary	To provide a threshold on stress hormone
Importance of issue to impact assessment	To understand what level of stress hormone is considered acceptable by the Proponent and which threshold would trigger adaptive management plans.
Detailed Review Comment	The Proponent stated: “Should the stress hormone study determine that caribou are having negative physiological responses to Project activities, then potential Project stressors will be adaptively managed.” (FEIS Addendum, section 7.2.2.3, p.7-49). It is unclear what is the threshold level of stress hormone which will trigger the adaptive management plan. The Proponent also does not explain a range of stress hormone acceptable for its monitoring.
Recommendation/ Request	Sabina should define its stress hormone threshold and the acceptable range.