



# **BACK RIVER PROJECT 2019 Annual Report**

**March 31, 2020**



## Community Engagement

Sabina is committed to acting as a steward of the environment and promoting sustainable development of communities in the Kitikmeot Region. Sabina continually strives for ways to engage in open and meaningful consultation with Kitikmeot residents, communities (Cambridge Bay, Gjoa Haven, Kugluktuk, Kuugaruk, Taloyoak, and Bathurst Inlet/Bay Chimo), and stakeholders so that the Project can be built in a manner consistent with regional needs and aspirations. Community engagement methods employed by Sabina are numerous and have included, but are not limited to, presenting Project related information in public and stakeholder meetings, and community newsletters; the establishment of a community relations office and Community Liaison Officer position in Cambridge Bay; and a community donations policy focused on supporting initiatives pertaining to 'youth and education' and 'community wellness and traditional lifestyles' in Kitikmeot communities.

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Nunallaagmiunik Katimapkaiyut

Sabina atuqpiarahuq havakni kamagittiaqhugit tahapkuat avatai aturahuaqtitnilu ihuaqhihimayunik pivaliatitni nunaluiyut tahamani Kitikmeotni. Sabina pinahuanginnaqtuq pityuhiqn timeriqatun qiqataupkaqni angmaumayumik hulittiaqtuniklu uqaqtigiknit tahapkuat Kitikmeot nunaluiyut, nunalii (Ikaluktutiak, Uqhuqtuuq, Kugluktuk, Kuugaruk, Taloyoak, tamnalu Kingaok/Omingmaktok), tapkuatlu piqatauyut piyakhait tamna Havanguyuq hanayaulaq pipugu atuinaqnianik tahapkununga nunaluiyut avikhimaniani piyaqaqnit piyumanilu. Nunaluiyuy piqataupkaqni pityuhiit atuqtauyut tapkunanga Sabina amigaaittut ilautitlugitlu, tapkuatangittugaluit, hatqiqtitnia Havanguyuq turangani tuhagakhat inungnut tapkuatlu piqatauyut katimaniitni, tapkuatlu nunaliknut tuhagakhaliat; tapkuat pinguauna nunalikni kivaqtutit aapisia tamnalu Nunalikni Kivgaqti Havakti havakhaq talvani Ikaluktutiak; tamanlu nunaliknut tunityutit maligaq pinahuaqtut ikayuqnik pigiarutit pipugit tapkuat ‘inulrammiit iliharniq’ tamnalu ‘nualuiyut inuuhigikni pitquhiitlu inuuhit tahamani Kitikmeot nunaluiyuni.





### *Kugluktuk Grizzlies Pancake Breakfast*

To fulfill this responsibility in regards to community involvement, Sabina has established Socio-economic Management Plans that commit the Company to communicate openly with employees, contractors, local stakeholders, governments, and the public on Project activities, environmental programs, social programs and performance.

In April 2018, Sabina and the Kitikmeot Inuit Association (KIA) entered into 20 year benefit and land tenure agreements under a Framework Agreement, setting out rights and obligations with respect to surface land access on Inuit Owned Land on the Back River Project. These agreements provide Inuit of the Kitikmeot Region with financial and socio-economic benefits including, training, jobs, formation of an Inuit Environmental Advisory Committee, investments in community infrastructure projects with the objective of supporting regional wealth creation initiatives within Kitikmeot communities, share ownership in Sabina, and a 1% net smelter royalty on future production from the proposed mine on the Goose Property.

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Piyanga una havanguyuq piplugu tapkuat nunaliiyut ilautitni, Sabina pingutit Inuliquitit-maniliurutit Aulataunit Parnautit tapkuat atuqpiarahuaqni tapkuat Nanminilgit uqaqatigini angmaumayumik havaktinut, katuraktit, nunalikni piqatauyut, kavamait, inungnutlu Havanguyumun huliniit, avatiliqutit havagutai, inuliquitit havagutit havariyauttiagnitlu.

Talvani Aipuru 2018, Sabina tapkuatlu Kitikmeot Inuit Katutyiqatigit (KIA) piqatigiktut taphuminga 20 ukiunut ihuaqutit nunamiklu pihimaniq angirutit malikhugu tamna Havagutai Angirutit, ihuaqhaqni pilarutit aturiaqaqnitlu piplugit nunap qangani pilaqnit tapkunani Inuit Nanmini Nuna tahamani Hanningayuq Havauhikhaq. Tahapkuat angirutit piqaqtitai Inuit tahamani Kitikmeotni kiinauyaliktuinut tapkuatlu inuliquitit-maniliurutit ihuaqutai ilautitlugit, iliharniq, havat, pinguatitnia tamna Inuit Avatinut Unniqtuiyut Katimayiralaangit, hanivaiviuni nunalikni havagutikhat havanguyut ihumagiplugit ikayuqtuqni nunalii avikhiமானိаны аyyuqharuiqnit pinguatitni pigiarutit tahamani Kitikmeotni nunaliiyut, atuqatigikni nanminirini tapkunani Sabina, tamnal 1% katitlugit havaikhaliuqnit utqiivini hivunikhami hanayaunit tapkunanga uukturitauyuq uyarakhiuqvik talvani Goose Havakvia.

### Highlights and Challenges



In 2017 and 2018, Sabina obtained critical environmental and regulatory authorizations, entered into land tenure agreements and an Inuit Impact Benefit Agreement (IIBA) with the KIA, initial commissioning of the MLA, made our first sea lift deliveries, and made a significant new exploration discovery at the Goose Property with the Nuvuyak gold zone.

The Back River Project Type A Water Licence was approved by the responsible Federal Minister on November 14, 2018. Sabina's Type A Water Licence enables mine construction and operation activities at the Project.

In 2019, Sabina completed ongoing exploration activities as well as additional pre-development activities at the site focused on advancing and de-risking future development, including:

- Construction and operation of Sabina's inaugural WIR which included successful delivery of equipment, supplies, and other goods to the Goose Property necessary for construction of the Back River Project
- Completion of minor earthworks at the MLA
- Completion of a cargo sealift
- Preliminary construction of a bulk fuel storage tank at the MLA
- Continued gold exploration and resource definition at the Goose Property

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Ahurtauyumini Akhurnagnitlu

Talvani 2017 tamnalu 2018, Sabina pitaqtat atuqpiarialik avatiliqutit aulatyutitlu pilarutai, piqatauyut tapkununga nunamik atuqtuaqni angirutit tamnalu Inuit Aktuani Ihuaqutit Angirutit (IIBA) tapkununga Kitikmeot Inuit Katutyiqatigit (KIA), hivulliqmik atuliqititnia tamna Tariuqni Iliuqaivik Nuna (MLA), pipkaqtavut hivulliq tariukkut agyaqtuqviuni, pipkaqinilu angipyaktumik nutaq havikhaqiuqni nalvaunia talvani Goose Havaqvia pipluq tamna Nuvuyak gold piqaqnia.

Tamna Hanningayuuq Havauhikhaq Qanurittunia A Imaqmun Laisa angiqtauyuuq taphumanga havalik Kavamatuqatkutni Minihitauyuuq talvani Nuvipa 14, 2018. Sabina-kut Qanurittunia A Imaqmun Laisa pilaqtitai uyarakhiugvik hananikha aulataunialu huliniit talvani Havanguyumi.

2019-mi, Sabina iniqmiyattauq angipyaktumik pivaliatitauniahagtittu-  
huliniit talvani hannavik pinahuaqnit hivunmuktitni pivaliatitni,  
ilautilugit:

- Hanayaunia aulataunialu tamna Sabina-kut atuqpalihaqnianit Ukiumi Hikukkut Apqut (WIR) tamna ilalik attuttiaqnia agyaqtuqni hanalrutit, ilakhat, ahiilu hunat talvunga Goose Havauhikhaq aturialgit hanayaunianut tamna Hanningayug Kuugaa Havauhikhaq
- Iniqtauni mikiyut nuani havat talvani Tagiumi Iliuqaqvik Nuna (MLA)
- Iniqtaunia uhigiyauyunut umiaqpakkut
- Hivulliqli hanayauni angiyut uququyuaq tutqumavi qattaqyuaq talvani Tagiumi Iliuqaqvik Nuna (MLA)
- Atuinaqni guullit havikhaqhiuqni piquaqnitlu unniqtuqnit talvani Goose Havauhikhaq







*Kugluktuk Grizzlies Girls Soccer Team attend Territorial Championships*

## Next Steps

Back River Project 2020 activities will focus on continued Exploration at the Goose Property. Sabina is actively seeking additional financing for both Exploration and Pre-Development works. At this time, Sabina will not be entering the Construction Phase of the Project.

With a focus on researching and building solid foundations for cultural and training programs, Wealth Creation projects and Inuit employment to name a few, Sabina is committed to working with community members, stakeholders, working groups, government and the KIA, on further implementation of the IIBA in 2020.

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Tukliit Atuqtakhat

Hanningayuuq Kuugaa Havauhikhaq 2020 huliniit pinahuaqniat atuinaqtauninut Havikhaqhirniq talvani Goose Havauhikhaq. Sabina huliyyut qiniqtut ilagiarutikhanik maniktakhat tamatkiknut Havikhaqhiurniq tamnalu Pivialitaitaaniahaqtitlugu havat. Tatyallak, Sabina pinahuaqniangittuuq Hanayaanianut Tukligikhaq taphumunga Havanguyuuq.

Pinahuaqhugu naunaiyainiq hananiau tunngatikhait ilitquhiquit iliharniqilu havagutai, Ayuqharuirniq Pinguqtitni havanguyut tapkuatlu Inuit havaktitni taiplugit ikittugaluit, Sabina atuqpiarahuaq havaqatigini tapkuat nunaluyuni ilauyut, piqatauyut, havqatigit ilagilit, kavamatkut tapkuatlu Kitikmeot Inuit Katutyiqatigit (KIA), atupaliatyutainut tapkuat Inuit Aktuanit Ihuaqutit Angirutit (IIBA) 2019-mi.

# BACK RIVER PROJECT

## 2019 Annual Report

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## Acronyms

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AQMMP	Air Quality Monitoring and Management Plan
CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
CTAG	Caribou Technical Advisory Group
DFO	Fisheries and Oceans Canada
ECCC	Environment and Climate Change Canada
EMS	Environmental Management System
FEIS	Final Environmental Impact Statement
GNDOE	Government of Nunavut Department of Environment
GNWT	Government of Northwest Territories
IEAC	Inuit Environmental Advisory Committee
IIBA	Inuit Impact Benefit Agreement
INAC	Indigenous and Northern Affairs Canada
IOL	Inuit Owned Land
KIA	Kitikmeot Inuit Association
KSEMC	Kitikmeot Socio-Economic Monitoring Committee
MLA	Marine Laydown Area
NIRB	Nunavut Impact Review Board
NWB	Nunavut Water Board
Project	Back River Project
PC	Project Certificate No. 007
Report	NIRB Annual Report
Sabina	Sabina Gold & Silver Corp.
SEMWG	Socio-Economic Monitoring Working Group
TC	Terms and Conditions
TOR	Terms of Reference
TSF	Tailings Storage Facility
WIR	Winter Ice Road
WMMPP	Wildlife Mitigation and Monitoring Program Plan

# 1. Introduction

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## 1.1 PROJECT OVERVIEW

The Back River Project (the Project) is a gold project owned by Sabina Gold & Silver Corp. (Sabina) within the West Kitikmeot region of southwestern Nunavut (Figure 1). It is situated approximately 400 kilometres (km) southwest of Cambridge Bay, 95 km southeast of the southern end of Bathurst Inlet (Kingaok), and 520 km northeast of Yellowknife, Northwest Territories. The Project is located predominantly within the Queen Maud Gulf Watershed (Nunavut Water Regulations, Schedule 4).

The Project is comprised of two main areas with interconnecting winter ice roads (WIR): Goose Property (Figure 3) and the Marine Laydown Area (MLA) (Figure 4) situated along the western shore of southern Bathurst Inlet. The majority of annual resupply will be completed using the MLA, and an approximately 160 km long WIR will interconnect these sites.

## 1.2 REGULATORY CONTEXT

Sabina must obtain and comply with requirements of various authorities including, land use planning, environmental assessment, Inuit water rights, and any other Federal, Territorial act, regulation or guideline applicable to the Project.

The Goose Property, WIR, and MLA are located predominately on Inuit Owned Land (IOL), with some infrastructure on Crown land (i.e., Tailings Storage Facility [TSF]). The lead authorizing agencies for the Project are the Nunavut Impact Review Board (NIRB), Nunavut Water Board (NWB), Kitikmeot Inuit Association (KIA), and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). The Project requires the authorization and consent for development, construction, operations, and closure of the Mine and its related facilities. Approvals are in the form of a land use lease, production lease, and Inuit Impact Benefit Agreement (IIBA), water compensation agreements, and other forms of approvals and authorizations. On December 6, 2017, the Minister of Indigenous and Northern Affairs Canada, on behalf of the five responsible federal Ministers, accepted the NIRB's recommendation for the Project to proceed to the regulatory and licensing phase. Following the completion of a Project Certificate (PC) workshop held on December 14, 2017 the NIRB issued the final PC pursuant to Section 12.5.12 of Article 12 of the Nunavut Agreement. The Project received its final PC on December 19, 2017.

Sabina subsequently finalized an IIBA with the KIA, with an effective date of June 1, 2018. Furthermore, Sabina received the Project's Type A Water Licence from the NWB on November 14, 2018. A full list of applicable acts, regulations, and guidelines that govern the Project and their current status are provided in Table 1.2-1.

Table 1.2-1. Permit Registry

Authorization No.	Expiry (y-m-d)	Agency	Description
PC No. 007	N/A	NIRB	Back River Project NIRB Project Certificate
2AM-BRP1831	2031-12-31	NWB	Back River Type A Water License
N/A	2038-06-31	KIA	Inuit Impact and Benefit Agreement
KTCL-18D001	2038-04-20	KIA	Commercial Lease - Goose
KTCL-18D002	2038-04-20	KIA	Commercial Lease - MLA
KTCL-18D003	2038-04-20	KIA	Commercial Lease - Winter Road
KTAEL-18C001	2023-04-20	KIA	Advanced Exploration Lease - George
LUL-XX	5 years from Effective Date	KIA	Land Use Licence as per KIA Framework Agreement
KTCL312C004	2020-04-25	KIA	Wishbone-Malley Exploration Activities
N2018F0021	2023-10-29	CIRNAC	CAT Train Beechy Lake Area
N2017F0016	2022-07-20	CIRNAC	CAT Train connecting Bathurst Inlet - Back River Project
N2016C0011	2021-10-26	CIRNAC	Back River Exploration Activities
N2018F0017	2023-10-11	CIRNAC	Winter Ice Road Back River Project
Lease No. 76J/12-7-2	2048-08-14	CIRNAC	Marine environment land lease - adjacent to MLA
Lease No. 76J/9-1-2	2048-04-26	CIRNAC	Goose Lake Tailings Storage Facility
2BE-GOO1520	2020-02-18	NWB	Goose Water Licence (Type B)
2BE-GEO1520	2020-05-29	NWB	George Water Licence (Type B)
2BE-MLL1722	2022-06-29	NWB	Wishbone-Malley Water Licence (Type B)
2BC-BRP1819	2019-04-30	NWB	Type B Development Works Water Licence (Replaced by Type A)
12-HCAA-CA7-00007	2031-12-31	DFO	<i>Fisheries Act</i> Authorization - Back River Project
18-HCAA-00185	N/A	DFO	Letter of Authorization - Gander Culvert
18-HCAA-00971	N/A	DFO	Letter of Authorization - MLA
18-HCAA-01626	N/A	DFO	Letter of Authorization - Winter Ice Road
04 009 19R-M	2019-12-31	NRI	Back River Project Scientific Research License
2012-600767-002	N/A	TC	<i>Navigation Protection Act</i> - MLA Discharge Pipeline Authorization
2012-600767-003	N/A	TC	<i>Navigation Protection Act</i> - MLA Intake Pipeline Authorization

### 1.3 REPORT STRUCTURE

Sabina's Annual NIRB Report is composed of the following sections:

- Section 1: provides an overview of the Project and the regulatory context in which this Report is being submitted.
- Section 2: highlights key activities and consultation efforts conducted with stakeholders for the Project, including the Kitikmeot communities the KIA, relevant regulatory agencies and the PC mandated Project working groups (Inuit Environmental Advisory Committee [IEAC] and the Back River Socio-Economic Monitoring Working Group [SEMWG]).



- Section 3: describes the Project's operational context in 2019, provides an overview of operational successes, and discusses challenges Sabina faced with respect to meeting PC Terms and Conditions in 2019.
- Section 4: includes a 'summary sheet' detailing compliance for each of the 94 PC Conditions. The summary sheets provide an overview of the work completed towards meeting the requirements of all the PC conditions, and a status of compliance is assigned. This section also describes Sabina's general approach to performance reporting as well as regulatory compliance.

## 2. Stakeholder Engagement Activities

### 2.1 STAKEHOLDER ENGAGEMENT OVERVIEW

Sabina is committed to acting as a steward of the environment and promoting sustainable development of communities in the Kitikmeot Region. To fulfill this responsibility Sabina has established Socio-economic Management Plans that commit the Company to communicate openly with employees, contractors, local stakeholders, governments and the public on Project activities, environmental programs, social programs and performance. Sabina has also established a Community Engagement Plan to outline how the Company engages in consultation. Sabina continues to be a member of and participate in the Kitikmeot Socio-Economic Monitoring Committee as well as the Back River Socio-Economic Monitoring Committee Working Group.

### 2.2 COMMUNITY ENGAGEMENT

Sabina continually strives for ways to engage in open and meaningful consultation with Kitikmeot residents, communities (Cambridge Bay, Gjoa Haven, Kugluktuk, Kugaaruk, Taloyoak, and Bathurst Inlet/Bay Chimo) and stakeholders so that the Project can be built in a manner consistent with regional needs and aspirations.

Community engagement methods employed by Sabina are numerous and have included but are not limited to the following; presenting Project related information in public and stakeholder meetings, community newsletters; the establishment of a community relations office and Community Liaison Officer position in Cambridge Bay; and a community donations policy focused on supporting initiatives pertaining to 'youth and education' and 'community wellness and traditional lifestyles' in Kitikmeot communities. As of December 2019, Sabina has had a total of 277 meetings in the North (Figure 2.2-1). Of those meetings, 219 have been in the Kitikmeot Region. The Project continues to have overwhelming support from Inuit.

Figure 2.2-1. Community Meetings in the Kitikmeot as of December 2019



## 2.3 ENGAGEMENT WITH THE KIA

Sabina and the KIA entered into 20 year benefit and land tenure agreements under a Framework Agreement dated April 2018, setting out rights and obligations with respect to surface land access on IOL on the Back River Project. These agreements provide Inuit of the Kitikmeot Region with financial and socio-economic benefits including, training, jobs, formation of an IEAC, investments in community infrastructure projects with the objective of supporting regional wealth creation initiatives within Kitikmeot communities, share ownership in Sabina, and a 1% net smelter royalty on future production from the proposed mine on the Goose Property. In March 2019, Sabina and the KIA met face to face for the annual Presidents Meeting to discuss project updates and IIBA Implementation.

## 2.4 ENGAGEMENT WITH GOVERNMENT AND REGULATORY AGENCIES

Sabina's government engagement program provides government officials with clear and comprehensive information regarding the Project and the various management and mitigation plans that support its development. Sabina has engaged a number of federal agencies about the Project, including the Canadian Northern Economic Development Agency, Fisheries and Oceans and Canadian Coast Guard Canada, CIRNAC, Environment and Climate Change Canada (ECCC), Natural Resources Canada, and Transport Canada. Sabina also actively engages both territorial governments (Government of Nunavut and the Government of the Northwest Territories).

## 2.5 ENGAGEMENT WITH WORKING GROUPS

### 2.5.1 Back River Socio-Economic Monitoring Working Group

Sabina is actively involved in the Kitikmeot Socio-Economic Monitoring Committee (KSEMC) and regularly participates in its meetings. Most recently, Sabina participated in the KSEMC's April 2019 meeting in Cambridge Bay. An initial draft of the Inuit Housing Survey was distributed during the 2019 KSEMC. Sabina will continue to engage the KSEMC, SEMWG, and community stakeholders on the Project's monitoring program.

## 2.6 NEXT STEPS

Sabina is committed to and heavily engaged in assisting project contractors in an effort to aid their goals of attaining greater Inuit Employment. Sabina continues to explore impactful ways in which we can be involved at a Community Level, as well as continued work with community members, stakeholders, working groups, government and the KIA, on further implementation of the IIBA in 2020.

## 3. Operations Overview

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### 3.1 2019 HIGHLIGHTS AND CHALLENGES

In 2019, Sabina completed several key Pre-Development activities at the site focused on advancing and de-risking future development, including:

- Construction and operation of Sabina's inaugural WIR which included successful delivery of equipment, supplies, and other goods to the Goose Property necessary for construction of the Back River Project
- Completion of minor earthworks at the MLA
- Completion of a cargo sealift
- Preliminary construction of a bulk fuel storage tank at the MLA
- Continued gold exploration and resource definition at the Goose Property

Sabina has yet to make a full construction decision due to the lack of a financing decision. Sabina is actively seeking additional financing for both Exploration and Pre-Development activities for 2020.

#### 3.1.1 Permitting

Sabina and the KIA announced on April 23, 2018 that the parties have entered into 20 year benefit and land tenure agreements under a Framework Agreement setting out rights and obligations with respect to surface land access on IOL on the Back River Project.

On September 21, 2018, the Company received a copy of the NWBs recommendation to the Minister of Intergovernmental Affairs, Northern Affairs and Internal Trade, the responsible Federal Minister (the Minister), that the Project's Type A Water Licence should be issued with proposed terms and conditions. On November 14, 2018, Sabina received confirmation that the Minister has approved the Type A Water Licence with no changes to the terms and conditions.

Sabina also continued to advance and obtain the necessary Federal permits and authorizations for the Project in 2019. Sabina received the Back River Project *Fisheries Act* Authorization from the Department of Fisheries and Oceans Canada, as well as authorization from Transport Canada that Umwelt Lake and Llama Lake do not require exemption from the *Navigation Protection Act (NPA)*.

Since receipt of the NIRB Project Certificate (PC No. 007) and the NWB Type A Water Licence (2AM-BRP1831), Sabina has continued to advance Detailed Engineering and additional field work related to Construction, Operations, and Closure of the Back River Project (the Project). Through this Detailed Engineering and additional efforts, Sabina has identified modifications that would optimize and de-risk the Project. Sabina intends to submit a package containing the proposed Project modifications for regulatory consideration in 2020.

### 3.1.2 Engineering

In support of the path to production, Sabina has been focused on a series of value and detailed engineering programs on the Project with the objectives of investigating opportunities, setting key design criteria, improving the accuracy of the engineered and design elements, updating the project execution strategy, improving the accuracy of the capital cost estimate, and improving the overall execution schedule.

### 3.1.3 Exploration

A significant new high-grade gold discovery, the Nuvuyak gold zone, occurring approximately 1 km to the west of the Goose Main Deposit, was identified in 2018. The mineralization at Nuvuyak was further explored and identified through successful drilling in 2019. Sabina also continued to grow through extension exploration drilling, the existing high impact targets at the Goose Property that include Llama Extension, Umwelt Vault, and the Goose Main trend. Summer field programs have focused on advancing the Back River deposit level paragenesis in regard to the known gold mineralization and related alteration. Uncovering a 50 m x 20 m bedrock exposure at the Goose Main deposit enabled detailed studies of mineralogy, stratigraphy and structure to further increase confidence in the deposit scale mineralizing controls.

### 3.1.4 Employment

Increasing the Inuit workforce at the Project is, and has always been, a key objective for Sabina. In 2019, a total of 145,170 hours (Sabina Staff and Contractors) were logged at the Project site. Of those hours, 15% were performed by Inuit workers. Sabina staff accounted for 28,590 of the 184,867 hours and of the Sabina staff hours, 27% were performed by Inuit workers. We will continue to work with the KIA and other relevant stakeholders to connect Inuit workers with available jobs at the Project site.

### 3.1.5 Training

A total of 189 hours of training were provided on site in 2019. Ranging from equipment operation to the offloading of fuel, there was Inuit participation in all training areas offered. Of the 189 training hours in 2019, Inuit workers accounted for 96 hours, or 51%. The small number of training programs offered reflect the limited and short-term/seasonal nature of pre-construction activities that occurred in 2019.

### 3.1.6 Contracting

In 2019, a total of \$27.1 million in expenditures were made to 240 businesses. Of this, \$15.9 million in expenditures were made to 73 northern businesses (including Kitikmeot Qualified Businesses, NTI Registered Inuit Firms, Nunavut Businesses, and other Northern Businesses); from this, \$5.6 million in expenditures were made to 14 Kitikmeot Qualified Businesses. This indicator includes any amounts spent on Project-related business expenditures, minus payroll and corporate expenditures; it is not limited to amounts spent through formally negotiated contracts. These business expenditures also reflect the limited and short-term/seasonal nature of pre-construction activities that occurred in 2019.

## 3.2 NEXT STEPS

Exploration at the Back River Project in 2020 will resemble activities similar to the past several years. Sabina anticipates an approximate 8-week winter exploration drilling program at the Goose Property starting in early March. Sabina may also complete a summer field based and fall exploration program at Goose site.



Sabina is actively seeking additional financing for both continued Exploration and Pre-Development works and as such, Sabina will not be entering full construction of the Back River Project at this time. Should necessary financing be secured, Sabina will provide an updated workplan, but at this time 2020 activities may include:

Goose Property

- Operation of the airstrip quarry
- Continue all-weather road construction towards the Goose Process Plant Pad and Umwelt
- Pad preparation for the bulk fuel storage and plant site
- Commencement of the Vault Underground decline
- Extension of the all-weather airstrip
- Minor enhancements are also anticipated to the structures at the Goose camp

Marine Laydown Area

- Materials receipt via an airlift or sealift campaign
- Continued bulk fuel tank construction and installation/upgrade of additional structures
- Minor earthworks upgrades to existing pads, airstrips, and roads

## 4. Performance on Project Certificate Terms and Conditions

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### 4.1 APPROACH TO PERFORMANCE REPORTING

Sabina's Environmental Management System (EMS) provides a framework for the environmental and socio-economic monitoring activities to be implemented through the life of the Project. The system incorporates the strategies employed for adaptive management using the precautionary principle to pursue the goals of sustainable development. Within this framework, individual management plans have been drafted to address all aspects of the company's activities and contain the detailed mitigation measures and monitoring programs that will be implemented throughout the life of the Project to eliminate or minimize adverse effects.

The EMS also verifies that standard operating procedures reflect legal requirements pertaining to the Project, and that conditions set at the time of the Project's authorizations, as well as requirements pertaining to the relevant laws, regulations, and permits are met. All Project employees and contractors are required to comply with these management plans. The reporting and documentation requirements, auditing, and processes for management review and revisions are all specified in the EMS. This system will offer enough flexibility to respond to the monitoring results in a timely fashion to reduce or eliminate potential adverse residual effects to the natural and socio-economic environments.

The NIRB and Sabina have various administrative and regulatory obligations that support the efficient and effective implementation of Project Certificate No. 007, including responsibilities to ensure interested members of the public have reasonable access to information about the Project as it progresses.

On May 7, 2018 the NIRB confirmed appointment of the Back River Project Monitoring Officer:

Nunavut Impact Review Board  
 Attn: Jaida Ohokannoak  
 Technical Advisor II  
 PO Box 1360 (29 Mitik St.)  
 Cambridge Bay, NU X0B 0C0  
 Email: johokannoak@nirb.ca

### 4.2 METHODOLOGY AND CRITERIA

An individual summary sheet for each of the ecosystemic, socio-economic and other terms and conditions has been provided starting in Section 4.5 of this NIRB Annual Report. The category and content of information provided in these summary sheets is outlined in Table 4.2-1.

Table 4.2-1. Layout of PC Condition Summary Sheets

Item	Summary of Content
Category	<ul style="list-style-type: none"> <li>Category as defined in PC No. 007</li> </ul>
Responsible Parties	<ul style="list-style-type: none"> <li>Responsible party as defined in PC No. 007</li> </ul>
Project Phase(s)	<ul style="list-style-type: none"> <li>Phase(s) of the Project the PC TC is applicable to: <ul style="list-style-type: none"> <li>Pre-construction</li> <li>Construction</li> <li>Operations</li> <li>Temporary Closure/Care and Maintenance</li> <li>Closure</li> <li>Post-Closure</li> </ul> </li> </ul>
Objective	<ul style="list-style-type: none"> <li>Objective as defined in PC No. 007</li> </ul>
Term or Condition (TC)	<ul style="list-style-type: none"> <li>TC as defined in PC No. 007</li> </ul>
Reporting Requirement	<ul style="list-style-type: none"> <li>Reporting Requirement as defined in PC No. 007</li> </ul>
Status of Compliance	<ul style="list-style-type: none"> <li>A self-assessed status of compliance in the PC TC: <ul style="list-style-type: none"> <li>Compliant</li> <li>Partially-compliant</li> <li>Non-compliant</li> </ul> </li> </ul>
Stakeholder Review	<ul style="list-style-type: none"> <li>Stakeholders and other interested parties that participate in discussions and reviews related to aspects and implementation of regulatory submission of actions or documents relevant to the PC TC.</li> </ul>
Reference	<ul style="list-style-type: none"> <li>Description/title of relevant documents where supporting information related to PC TC status of compliance its available for review.▫</li> </ul>
Methods	<ul style="list-style-type: none"> <li>The methods employed to complete work required to meet compliance in the PC TC.</li> <li>Summary of any adaptive management measures employed that year in support of achieving compliance to the PC TC.</li> </ul>
Results	<ul style="list-style-type: none"> <li>Summary of efforts or work that were completed in support of achieving PC TC compliance in previous reporting years, where applicable.</li> </ul>
Trends	<ul style="list-style-type: none"> <li>Summary of notable trends from previous years.</li> </ul>
Next Steps	<ul style="list-style-type: none"> <li>Summary of any operational changes undertaken or recommended for the future to achieve compliance or to further enhance environmental performance.</li> <li>Assessment of effectiveness of monitoring program and whether any changes to the scope of monitoring are appropriate.</li> <li>Identification of any challenges related to implementing mitigation measures, undertaking monitoring, or obtaining data from other sources.</li> </ul>

### 4.3 SUMMARY OF 2019 COMPLIANCE WITH TERMS AND CONDITIONS

Table 4.3-1 outlines the status of compliance levels and describes the criteria related to each of these options. The proposed levels of compliance have been adopted from other Nunavut mining development projects subject to NIRB authority.

Table 4.3-1. Status of Compliance Terminology and Criteria

Status of Compliance	Criteria
Compliant	Term and Condition requirements have been met
Partially-Compliant	Term and Condition requirements have been partially met <i>*Demonstrable efforts towards meeting compliance requirements is evidenced.</i>
Non-Compliant	Term and Condition requirements have not been met <i>*Rationale for being unable to meet compliance requirements is provided.</i>

Sabina was issued Project Certificate No. 007 on December 19, 2017. Following receipt of the Project Certificate Sabina immediately began implementation where applicable. In general, Sabina believes they are in compliance with the Terms and Conditions of the Project Certificate. Refer to the individual summary sheet for each Term and Condition as follows:

- Section 4.5 Performance on Ecosystemic Terms and Conditions (No.1 to 65)
- Section 4.6 Performance on Socio-Economic Terms and Conditions (No.66 to 88)
- Section 4.7 Performance on Other Terms and Conditions (No. 89 to 94)

#### **4.4 REGULATORY COMPLIANCE**

##### **4.4.1 Agency Inspections and Site Visits**

A summary of agency inspections and site visits for the calendar year being reported is provided below.

1. January 30: CIRNAC Water Licence Inspection
2. May 9: KIA Back River Project Winter Ice Road Site Visit
3. May 9: CIRNAC Land Use Inspection
4. July 24: KIA Back River Project Inspection

Inspection results were conveyed during close-out meetings and are documented in Inspection Reports subsequently distributed to Sabina and relevant stakeholders. Sabina responded to any requests in the inspections to provide additional information and/or address the identified concerns.

##### **4.4.2 Unauthorized Discharges and Spills**

A summary of unauthorized discharges and spills that met or exceeded the reporting threshold as outlined in the Nunavut Spill Contingency Planning Regulations for the calendar year being reported is provided in Table 4.4-1.

Any spills that occurred were minor in nature, occurred on the terrestrial environment, with immediate response and clean-up resulting in negligible impact to the receiving environment. Consistent with Sabina's Environmental Management and Protection Plan (EMPP, October 2017) Sabina keeps track of all minor spills for review by an Inspector upon request. Two (2) spills were reported to the NT-NU Spill Report Line in 2019.

Table 4.4-1. Unauthorized Discharges in 2019

Sabina Spill No.	Date of Occurrence	Quantity	Material Spilled	Location	NT-NU Spill
<b>Goose Property</b>					
2019-14	4/10/2019	4L	Hydraulic Oil	Goose Property	N/A
2019-15	4/19/2019	400L	Drilling Brine	Goose Property	✓
2019-18	5/9/2019	10L	Jet A	Goose Property	N/A
2019-19	5/14/2019	5-10L	Gasoline	Goose Property	N/A
<b>Marine Laydown Area</b>					
2019-01	1/20/2019	0.5L	Engine Oil	MLA	N/A
2019-03	1/29/2019	0.5L	Hydraulic Oil	MLA	N/A
2019-04	1/31/2019	0.5L	Hydraulic Oil	MLA	N/A
2019-05	2/8/2019	0.5L	Hydraulic Oil	MLA	N/A
2019-08	3/6/2019	2L	Diesel	MLA	N/A
2019-20	7/11/2019	2L	Diesel	MLA	N/A
2019-21	8/15/2019	20L	Diesel	MLA	N/A
2019-22	8/26/2019	2L	Engine Oil	MLA	N/A
<b>Winter Ice Road</b>					
2019-02	2/9/2019	1L	Diesel	WIR	N/A
2019-06	2/14/2019	2L	ATF	WIR	N/A
2019-07	2/24/2019	90L	Hydraulic Oil	WIR	N/A
2019-09	3/16/2019	5L	Ethylene Glycol	WIR	N/A
2019-10	3/21/2019	80L	Hydraulic Oil	WIR	N/A
2019-11	3/25/2019	15L	ATF	WIR	N/A
2019-12	3/25/2019	4L	Hydraulic Oil	WIR	N/A
2019-13	4/2/2019	4L	Hydraulic Oil	WIR	N/A
2019-16	5/5/2019	0.5L	Hydraulic Oil	WIR	N/A
2019-17	5/9/2019	1L	Hydraulic Oil	WIR	✓

#### 4.4.3 Water Licence Compliance

Sabina currently one Type A water license for the Back River Project:

- Type A - 2AM-BRP1831: for the mining undertaking (Licence)

The water licence includes conditions on water use, wastewater management, and water quality monitoring, as well as the management of fuel and waste. Sabina reports on Water Licence compliance in Annual Reports which are provided directly to the NWB by March 31 annually for the previous calendar year, in accordance with the Regulations and as specified in the individual water licenses. For more information, refer to the Annual Reports posted to the NWB Public Registry (2AM-BRP1831 Annual Report).



## 4.5 PERFORMANCE ON ECOSYSTEMIC TERMS AND CONDITIONS

### 4.5.1 Air Quality (PC TCs 1 through 5)

#### Project Certificate Condition No. 1

Category	Air Quality Monitoring and Management Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To provide parties with updated information on air quality baseline information and monitoring conducted on-site
Term or Condition (TC)	<p>The Proponent shall have in place an Air Quality Monitoring and Management Plan, which shall include the following:</p> <ul style="list-style-type: none"> <li>a. Description of air monitoring stations including proposed timing of installation, location, and any factors considered with regards to planning for the installation;</li> <li>b. Plans for the collection of total suspended dust samples year round, including sampling for metals content relevant to the Project;</li> <li>c. Description of dustfall collectors;</li> <li>d. Description of lichen surveys;</li> <li>e. Identification of near field, far field and reference sites locations with demonstrated consideration for ambient wind conditions;</li> <li>f. Baseline data collected prior to significant construction activity; and</li> <li>g. A description of the proposed annual reporting mechanism and response framework.</li> </ul> <p>Commentary: The term “year round” is intended to convey that samples are collected during various times of the year, but does not mean continuous monitoring every day of the year.</p>
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 90 days prior to the start of construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	The Air Quality Monitoring and Management Plan (December 2015) was reviewed in conjunction with NIRB Environmental Assessment
Reference	Air Quality Monitoring and Management Plan (July 2019) - Appendix H

#### Methods:

The Air Quality Monitoring and Management Plan (AQMMP; December 2015) was reviewed by Stakeholders and the NIRB during the Final Environmental Assessment review process. Sabina has updated the AQMMP to capture stakeholder comments and Project Certificate requirements. The updated AQMMP can be found in Appendix H.

The revised Plan specifically includes:

- Descriptions of air monitoring stations including proposed timing of installation, locations and methods;
- Description of dust monitoring methodology and inclusion of dust metals analysis;
- Identification of near field, far field and reference sites locations with demonstrated consideration for ambient wind conditions;
- Discussion of baseline data collected prior to significant construction activity; and
- A description of the proposed annual reporting mechanism and response framework.

Lichen surveys are described in Sabina's Vegetation Monitoring Plan.

Results:

Not applicable.

Trends:

Not applicable.

Next Steps:

Sabina is currently undertaking on-site field inspections of existing monitoring equipment to ensure equipment is in proper working order prior to the Construction Phase.

During construction and operation of the Project, the AQMMP will monitor for and quantify Project air quality emissions and compliance with appropriate criteria and guidelines as specified in the AQMMP. Annual reporting will be completed for federal programs such as the NPRI and GHGRP when applicable.

The AQMMP is a "living document", and will be updated accordingly if Mine plans, conditions, monitoring results, or other factors necessitate revisions.

**Project Certificate Condition No. 2**

Category	Air Quality Mitigation and Adaptive Management
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure that mitigation and adaptive management measures effectively mitigate impacts on-site.
Term or Condition (TC)	The Proponent shall demonstrate through monitoring of air quality that all emissions remain within predicted levels and, where applicable, within limits established by all applicable guidelines and regulations. In cases where exceedances occur, the Proponent shall provide an explanation for the exceedance, a description of planned mitigation, and shall conduct additional monitoring to evaluate the effectiveness of mitigative measures.
Reporting Requirement	A summary of monitoring results and any exceedances noted shall be provided in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	The AQMMP (December 2015) was reviewed in conjunction with NIRB Environmental Assessment
Reference	Air Quality Monitoring and Management Plan (July 2019) - Appendix H

**Methods:**

The Air Quality Monitoring and Management Plan (AQMMP; December 2015) was reviewed by Stakeholders and the NIRB during the Final Environmental Assessment review process. Sabina has updated the AQMMP to capture stakeholder comments and Project Certificate requirements. The updated AQMMP can be found in Appendix H.

The revised AQMMP includes air quality monitoring and emissions quantification and sets out standards and guidelines against which air quality parameters will be screened. Monitoring results will also be compared to predicted levels in the annual reports. Section 8 of the AQMMP outlines mitigation and adaptive management approach should exceedances be observed.

**Results:**

Not applicable.

**Trends:**

Not applicable.

Next Steps:

Sabina is currently undertaking on-site field inspections of existing monitoring equipment to ensure equipment is in proper working order prior to the Construction Phase.

During construction and operation of the Project, the AQMMP will monitor for and quantify Project air quality emissions and compliance with appropriate criteria and guidelines as specified in the AQMMP. Annual reporting will be completed for federal programs such as the NPRI and GHGRP when applicable.

The AQMMP is a “living document”, and will be updated accordingly if Mine plans, conditions, monitoring results, or other factors necessitate revisions.

### Project Certificate Condition No. 3

Category	Air Quality Monitoring and Management Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure that mitigation and adaptive management measures effectively mitigate dust impacts on-site
Term or Condition (TC)	<p>The Proponent shall have in place dust management and monitoring plans which address the following items:</p> <ul style="list-style-type: none"> <li>a. Reflect commitments made in the Final Environmental Impact Statement, the Final Environmental Impact Statement Addendum, and through the Nunavut Impact Review Board's impact assessment process;</li> <li>b. Verify commitments to use dust suppressants on-site, including a description of the type of suppressant to be used, as well as the frequency and timing of applications to be made throughout the periods of applicable use;</li> <li>c. Specify commitments to the use of appropriate dust suppression measures when conducting activities in the landfill such as topping or capping;</li> <li>d. Outline the specific adaptive management measures to be considered should monitoring indicate that dust deposition is higher than predicted, specifically where project-related traffic is greater than initially expected or where meteorological events have instigated additional deposition; and</li> <li>e. Demonstrate consideration for the implementation of alternative methods (e.g., windscreens) to limit the deposition of dust generated from the Project.</li> </ul>
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 90 days prior to commencement of construction activities. Information regarding updates to the management and monitoring plans and/or mitigation measures implemented by the Proponent in fulfillment of this Term and condition shall be provided in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	The AQMMP (December 2015) was reviewed in conjunction with NIRB Environmental Assessment
Reference	Air Quality Monitoring and Management Plan (July 2019) - Appendix H

#### Methods:

The Air Quality Monitoring and Management Plan (AQMMP; December 2015) was reviewed by Stakeholders and the NIRB during the Final Environmental Assessment review process. Sabina has updated the AQMMP to capture stakeholder comments and Project Certificate requirements. The updated AQMMP can be found in Appendix H.

The updated AQMMP aligns with commitments made by Sabina during environmental impact assessment process and includes a Fugitive Dust Reduction Plan which provides information on dust suppressant use and dust suppression measures. Section 8 of the AQMMP also outlines Sabina's mitigation and adaptive management approach, including possible responses to increased dust generation. These may include alterations to dust suppressant application rate, frequency, methodology or type, and/or modifications of road maintenance protocols, and/or reductions in road usage through personnel awareness or use of alternate vehicles. Adaptive management response will also be triggered in real-time, based on site observations.

Results:

Not applicable.

Trends:

Not applicable.

Next Steps:

The AQMMP, including the Fugitive Dust Reduction Plan, will take effect during the Construction Phase of the Project. Information regarding updates to the management and monitoring plans and/or mitigation measures implemented by the Proponent in fulfillment of this T&C shall be provided in the Proponent's annual report to the NIRB.

### Project Certificate Condition No. 4

Category	Incineration Management Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure that waste management operations are conducted in line with regulatory guidelines.
Term or Condition (TC)	The Proponent shall develop and implement an Incineration Management Plan that demonstrates consideration for the recommendations provided in Environment and Climate Change Canada's Technical Document for Batch Waste Incineration (2010).
Reporting Requirement	The initial Incineration Management Plan must be submitted to the Nunavut Impact Review Board at least 60 days prior to the commencement of construction and must be tested within the first year of operations.  Subsequently, unless otherwise directed by Environment and Climate Change Canada, every (3) three years the Proponent shall provide the Nunavut Impact Review Board with confirmation of any changes to the Proponent's Incineration Management Plan in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant.
Stakeholder Review	Type A Water Licence regulatory review process stakeholders/intervenors.
Reference	Incinerator Management Plan (July 2019) - Appendix I

#### Methods:

The Incinerator Management Plan (IMP; December 2015) was reviewed by Stakeholders and the NIRB during the Final Environmental Assessment review process. Sabina has updated the IMP to capture stakeholder comments and Project Certificate requirements. The updated IMP can be found in Appendix I.

The updated IMP includes descriptions of incinerator operation and maintenance protocols, and environmental protection measures to be employed. The IMP as well as the AQMMP note the requirement to test incinerators following installation within their first year of use. Sabina will additionally provide an update to the NIRB on the IMP as revised, and at least every 3 years.

#### Results:

Not applicable.

#### Trends:

Not applicable.

#### Next Steps:

Concurrent with Part B, Item 17 of the 2AM-BRP1831 Water Licence, the Incineration Management Plan will also be submitted to reflect changes in operations and/or technology (if applicable) to the NWB for stakeholder review.

The IMP is a “living document”, and will be updated accordingly if Mine plans, conditions, monitoring results, or other factors necessitate revisions.



## Project Certificate Condition No. 5

Category	Stack Monitoring
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To monitor waste management operations.
Term or Condition (TC)	The Proponent shall provide the results of all stack testing conducted on temporary or permanent incinerators operated for the Project for the year in which testing was conducted.
Reporting Requirement	In years when a stack test occurs, results to be reported to the Nunavut Impact Review Board and to Environment and Climate Change Canada annually, or as may otherwise be required.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board and Environment Climate Change Canada
Reference	Incinerator Management Plan (July 2019) - Appendix I

## Methods:

All incinerator stack testing results will be provided to the NIRB within the subsequent annual report. The collection and analysis of samples will be conducted in compliance with appropriate stack test methods and undertaken by an accredited laboratory. The stack testing report will include a description of the incinerator and how it was being operated at the time of the stack emissions testing program, the methods used for sampling and analysis and a discussion of the results, including comparison with the Canada Wide Standards for Dioxins and Furans (CCME 2000a) and the Canada Wide Standards for Mercury (CCME 2000b).

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

Complete stack emissions testing for all incinerators will occur upon commissioning to ensure achievement of the Canada-wide Standards for Dioxins and Furans and the Canada-wide Standards for Mercury (CCME 2000, 2001). The frequency of recurring individual incinerator emissions testing at Sabina will be determined based on discussions with the appropriate regulatory authorities.

In years when a stack test occurs, results to be reported to the NIRB and to ECCC annually, or as may otherwise be required.

## 4.5.2 Climate and Meteorology (PC TCs 6 through 8)

## Project Certificate Condition No. 6

Category	Greenhouse Gas Reduction Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To monitor and reduce greenhouse gas emissions produced by the Project.
Term or Condition (TC)	<p>The Proponent shall maintain a Greenhouse Gas Emissions (GHG) Reduction Plan which includes:</p> <ul style="list-style-type: none"> <li>a. An estimate of the Project's GHG baseline emissions;</li> <li>b. A description of monitoring measures to be undertaken, including the methods, frequency, parameters, and a description of data analysis; and</li> <li>c. A description of mitigative and adaptive strategies planned, and taken, toward reducing the project-related emission of greenhouse gases over the Project's life.</li> </ul> <p>Commentary: The term "baseline emissions" denotes the emissions as predicted by Proponent prior to project development, but reflecting the GHG emissions of existing Project infrastructure (i.e., existing exploration camp and associated infrastructure).</p>
Reporting Requirement	Results to be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	The current AQMMP (including the GHG Reduction Plan) was reviewed in conjunction with NIRB Environmental Assessment.
Reference	Air Quality Monitoring and Management Plan (July 2019) - Appendix H

## Methods:

The Air Quality Monitoring and Management Plan (AQMMP; December 2015) was reviewed by Stakeholders and the NIRB during the Final Environmental Assessment review process. Sabina has updated the AQMMP to capture stakeholder comments and Project Certificate requirements. The updated AQMMP can be found in Appendix H.

The updated AQMMP includes an Emissions and Greenhouse Gas (GHG) Reduction Plan (Section 6.1.1 of the AQMMP). GHG generation will be estimated based on fuel use by equipment type (including waste oil burner use), usage of explosives, and any other potential GHG sources will be quantified and converted to quantities of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O based on established conversion factors. Relative to T&C 6 commentary, Sabina has noted in the AQMMP that baseline GHG emissions from the existing exploration camp are insignificant in the context of Project GHG emissions during construction and operations, so are considered to be "nil" for the purposes of comparison of future results. Section 8 of the AQMMP also outlines Sabina's mitigation and adaptive management approach. Any measures taken towards reducing Project GHG emissions will be described in the AQMMP annual reports.

## Results:

Not applicable. Results and analysis will be provided once monitoring during the Construction Phase of the Project has commenced.

Trends:

Not applicable.

Next Steps:

The Greenhouse Gas Reduction Plan will be executed at the commencement off the Construction Phase of the Project. An assessment of GHG emissions will be carried out annually to determine whether reporting to the federal Greenhouse Gas Reporting Program (GHGRP) is required. If so, the applicable reporting will be performed and required information submitted to ECCC through the established national reporting systems and will be provided to the NIRB in the annual report. The annual report will also include any information on GHGs will be quantified and summarized on an annual basis using guidance provided by ECCC (ECCC 2018), IFC (IFC 2017) and other published emissions factors. The revised AQMMP will describe mitigative and adaptive strategies employed by Sabina to minimizing minimize Project GHG emissions.

## Project Certificate Condition No. 7

Category	Mine Closure and Reclamation Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure mitigation, monitoring, and adaptive management measures are in place for the long-term stability, containment, and integrity of project components and the protection of environmental features.
Term or Condition (TC)	<p>The Proponent shall maintain a Mine Closure and Reclamation Plan designed to: identify the processes that may act upon the mine components after closure and reclamation so that they can be factored within the design and operation of the mine; ensure physical and chemical stability of mine components that remain after closure; ensure mine components that remain after closure will not require long-term active care; and consider future use and aesthetics of the area with the surrounding lands. This plan should include:</p> <ul style="list-style-type: none"> <li>a. An adaptive management component that documents monitoring and mitigation measures to ensure long-term containment of the Tailings Storage Facility and Waste Rock Storage Areas;</li> <li>b. Details for monitoring the thermal condition and stability of storage facilities;</li> <li>c. Details on the triggers for implementing alternative mitigation options;</li> <li>d. Details pertaining to ongoing monitoring and research being conducted to supplement the adaptive management protocols;</li> <li>e. Details on the plans to maintain the integrity of the groundwater quality within and adjacent to the Project; and</li> <li>f. Details on how the Proponent will carry out continued analyses over time to confirm or update the approximate fill time for the mine pits</li> </ul>
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 60 days prior to the start of construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	Crown Indigenous Relations and Northern Affairs Canada, Environment Climate Change Canada, Nunavut Water Board, Kitikmeot Inuit Association
Reference	<p>Back River Project Interim and Closure Reclamation Plan (October 2017)</p> <p>Sabina Gold &amp; Silver Corp. Final Submission for Back River Project Type A Water Licence Public Hearing (July 2018)</p>

## Methods:

In conjunction with the Type A Water Licence Application, Sabina submitted an updated Interim Closure and Reclamation (ICRP; October 2017). The ICRP was updated to reflect NIRB PC requirement items a to f, to ensure mitigation, monitoring, and adaptive management measures are in place for the long-term stability, containment, and integrity of project components and the protection of environmental features. NWB in accordance with Water Licence 2AM-BRP1831, Part B, Item 14 g, approved the ICRP.

Results:

In July 2018, additional feedback was received from stakeholders during the Type A Water Licence regulatory review process. This feedback, as well as Sabina's final response and commitments, will be incorporated into the next iteration of the ICRP. Sabina proposes to complete the next comprehensive iteration of the ICRP within 12 months following the commencement of the Operations Phase.

Trends:

Not applicable.

Next Steps:

Sabina will update the latest version of the ICRP (October 2017) and submit to the NIRB at least 60 days prior to the start of Construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.

## Project Certificate Condition No. 8

Category	Weather Monitoring and Adaptive Management
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To monitor local weather and adaptively manage potential impacts from extreme or abnormal weather conditions.
Term or Condition (TC)	The Proponent shall provide a summary report of meteorological conditions experienced within the project area including details related to temperature, wind velocities and patterns, precipitation, as well the onset of seasonal freeze and thaw cycles, and highlight extreme or outlying weather events.
Reporting Requirement	Results to be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	The AQMMP (December 2015) was reviewed in conjunction with NIRB Environmental Assessment.
Reference	Air Quality Monitoring and Management Plan (July 2019) - Appendix H

## Methods:

Sabina's Air Quality Monitoring and Management Plan referred to in Project Certificate T&C No.2, includes a meteorological monitoring program to monitor local weather and adaptively manage potential impacts from extreme and abnormal weather conditions.

## Results:

Not applicable. Results and analysis will be provided once monitoring during the Construction Phase of the Project has commenced.

## Trends:

Not applicable.

## Next Steps:

Sabina undertook on-site field inspections of existing monitoring equipment in 2019 to verify equipment is in proper working order prior to the Construction Phase.

Monitoring will begin during the Construction Phase and continue throughout Operations. Meteorology will be measured at on-site stations in accordance with the Meteorological Service of Canada meteorological station siting recommendations (MSC 2001), as per the AQMMP. Data will be recorded on an hourly basis. Supplemental data will be reviewed and included if relevant from appropriate publicly available stations such as ECCC weather stations.

Results from the monitoring programs will be reviewed annually and a summary report of meteorological conditions experienced within the project area including details related to temperature, wind velocities and patterns, precipitation, as well the onset of seasonal freeze and thaw cycles, and highlight extreme or outlying weather even with be reported to the NIRB in the annual report.

## Reference:

MSC (Meteorological Service of Canada). 2001. MSC STDS 2 - 2001. Siting Standards for Meteorological Observing Sites. June 2001.

## 4.5.3 Noise and Vibration (PC TCs 9 through 10)

## Project Certificate Condition No. 9

Category	Noise Reduction
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, and Final Closure
Objective	To ensure worker health and safety.
Term or Condition (TC)	The Proponent shall demonstrate consideration for noise reduction measures when siting and constructing both the Goose Property and Marine Laydown Area camps. Further, the Proponent shall demonstrate that noise levels will remain within reasonable limits and no further mitigation (e.g. additional sound proofing) is required.
Reporting Requirement	During construction, the Proponent shall, on an annual basis, provide information regarding mitigation measures and monitoring undertaken in fulfillment of this Term and Condition in the Proponent's annual report to the Nunavut Impact Review Board. During operations, once the sound levels associated with operations become stable and predictable, the Proponent shall provide information regarding monitoring results and any updates to mitigation measures every 2 (two) years in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Noise Abatement Plan initial stakeholder review undertaken during the NIRB Environmental Assessment.
Reference	Back River Project Noise Abatement Plan, Revision G.1 (November 2015) (NIRB PRI: 301426)  Back River Project FEIS Volume 4 Section 2: Noise and Vibration (November 2015)

## Methods:

Noise reduction measures were incorporated into design of the Goose Property and Marine Laydown Area. Modelling completed for the FEIS predicted residual effects from noise will be not significant. This T&C does not require additional monitoring or reporting prior to the Construction Phase.

Throughout the Project Construction and Operations phases, noise levels will be monitored in accordance with applicable legislation and guidelines. Additional details on noise monitoring methods are provided in the Noise Abatement Plan (November 2015). If monitoring data indicates noise levels in excess of reasonable limits and/or predictions from the FEIS, additional noise mitigation options will be considered.

## Results:

Not Applicable.

## Trends:

Not Applicable.

Next Steps:

Once the Project enters Construction, noise monitoring will be conducted on an annual basis using methods set out in the Noise Abatement Plan (November 2015). If monitoring data indicates noise levels in excess of reasonable limits and/or predictions from the FEIS, additional noise mitigation options will be considered.



## Project Certificate Condition No. 10

Category	Noise Reduction
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Construction, Operations
Objective	To ensure worker health and safety.
Term or Condition (TC)	The Proponent shall demonstrate its consideration of options to further mitigate noise generated from project activities, equipment, and components during normal operations as well as from project activities, equipment, and components that would remain operational during staged reduction events (e.g., noise barriers, acoustic insulation, exhaust silencers).
Reporting Requirement	During construction, the Proponent shall, on an annual basis, provide information regarding mitigation measures and monitoring undertaken in fulfillment of this Term and Condition in the Proponent's annual report to the Nunavut Impact Review Board. During operations, once the sound levels associated with operations become stable and predictable, the Proponent shall provide information regarding monitoring results and any updates to mitigation measures every 2 (two) years in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Noise Abatement Plan initial stakeholder review undertaken during the NIRB Environmental Assessment.
Reference	Back River Project Noise Abatement Plan, Revision G.1 (November 2015) (NIRB PRI: 301426)

## Methods:

Throughout the Project Construction and Operations phases, noise levels will be monitored in accordance with applicable legislation and guidelines. Additional details on noise monitoring methods are provided in the Noise Abatement Plan (November 2015). If monitoring data indicates noise levels in excess of reasonable limits and/or predictions from the FEIS, additional noise mitigation options will be considered.

## Results:

Not Applicable.

## Trends:

Not Applicable.

## Next Steps:

Once the Project enters Construction, noise monitoring will be conducted on an annual basis using methods set out in the Noise Abatement Plan (November 2015). If monitoring data indicates noise levels in excess of reasonable limits and/or predictions from the FEIS, additional noise mitigation options will be considered.

## 4.5.4 Terrestrial Environment (PC TCs 11 through 15)

## Project Certificate Condition No. 11

Category	Permafrost Mapping and Monitoring
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To monitor and plan for changing permafrost conditions.
Term or Condition (TC)	The Proponent shall conduct further permafrost mapping to document permafrost temperature, thickness of seasonal thaw and amount of ground ice in the project development area. This information will be made available to inform the detailed design of project infrastructure.
Reporting Requirement	During construction, the Proponent shall, on an annual basis, provide additional permafrost mapping information documented in fulfillment of this Term and Condition in the Proponent's annual report to the Nunavut Impact Review Board. Subsequently, once monitoring has demonstrated that the area(s) assessed are stable, every two years the Proponent shall identify, in the Proponent's annual report to the Nunavut Impact Review Board, any updates to the Proponent's previous permafrost mapping results.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board
Reference	Not applicable

## Methods:

Sabina shall conduct further permafrost mapping to document permafrost temperature, thickness of seasonal thaw, and amount of ground ice in the Project Development Area. This information will be made available to inform the detailed design of project infrastructure.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

During Construction, Sabina shall, on an annual basis, provide additional permafrost mapping information documented in fulfillment of this T&C in Sabina's annual report to the NIRB. Subsequently, once monitoring has demonstrated that the area(s) assessed are stable, every two years Sabina will identify in the annual report to the NIRB, any updates to Sabina's previous permafrost mapping results.

## Project Certificate Condition No. 12

Category	Permafrost Monitoring
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To monitor and mitigate impacts from the Project on permafrost.
Term or Condition (TC)	The Proponent shall monitor the effects of the Project on permafrost conditions relative to project infrastructure, including associated roads, waste rock stockpiles, trails, and quarries. Should permafrost degradation be observed, the Proponent shall report on measures implemented to restore and promote permafrost integrity.
Reporting Requirement	During construction, the Proponent shall, on an annual basis, provide information regarding the results of monitoring and identifying any mitigation measures undertaken in fulfillment of this Term and Condition in the Proponent's annual report to the Nunavut Impact Review Board. Subsequently, once monitoring has demonstrated that the area(s) assessed are stable, the Proponent shall provide information regarding monitoring results and any updates to mitigation measures every 2 (two) years in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board, Nunavut Water Board
Reference	Not applicable

## Methods:

Sabina shall monitor the effects of the Project on permafrost conditions relative to project infrastructure, including associated roads, waste rock stockpiles, trails, and quarries. Should permafrost degradation be observed, the Proponent shall report on measures implemented to restore and promote permafrost integrity.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

During Construction, Sabina shall, on an annual basis, provide information regarding the results of monitoring and identifying any mitigation measures undertaken in fulfillment of this T&C in Sabina's annual report to the NIRB. Subsequently, once monitoring has demonstrated that the area(s) assessed are stable, Sabina shall provide information regarding monitoring results and any updates to mitigation measures every two years in Sabina's annual report to the NIRB.

Sabina is required to have an annual geotechnical inspection completed by a Geotechnical Engineer of all major earthworks, between July and September. The inspection must be conducted in accordance with the *Canadian Dam Safety Guidelines* where applicable. This is a requirement of the Back River Project Type A Water Licence 2AM-BRP1831 (Part I, Item 10).

## Project Certificate Condition No. 13

Category	Sensitive Landform Mitigation and Monitoring
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate project impacts on sensitive landforms.
Term or Condition (TC)	The Proponent shall undertake additional geotechnical investigations as required to identify sensitive landforms, modify engineering design for project infrastructure (e.g., tailings storage facilities, waste rock piles, and landfill), and develop and implement mitigation and monitoring measures to prevent or minimize the impacts of the Project's activities and infrastructure on sensitive landforms. Plans for the investigations, mitigation, and monitoring measures are to be included within appropriate management plans.
Reporting Requirement	During construction, the Proponent shall, on an annual basis, provide information regarding the results of additional geotechnical investigations undertaken and any associated mitigation and monitoring measures implemented by the Proponent in the Proponent's annual report to the Nunavut Impact Review Board. Subsequently, once monitoring has demonstrated that the area(s) assessed are stable, the Proponent shall provide information regarding any updates to mitigation measures and monitoring every 2 (two) years in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board, Nunavut Water Board
Reference	Not applicable

## Methods:

Sabina shall undertake additional geotechnical investigations as required to identify sensitive landforms, modify engineering design for project infrastructure (e.g., tailings storage facilities, waste rock piles, and landfill), and develop and implement mitigation and monitoring measures to prevent or minimize the impacts of the Project's activities and infrastructure on sensitive landforms. Plans for the investigations, mitigation, and monitoring measures are to be included within appropriate management plans.

## Results:

Not applicable.

## Trends

Not applicable.

## Next Steps

During Construction, Sabina shall, on an annual basis, provide information regarding the results of additional geotechnical investigations undertaken and any associated mitigation and monitoring measures implemented by Sabina in Sabina's annual report to the NIRB. Subsequently, once monitoring has demonstrated that the area(s) assessed are stable, Sabina shall provide information regarding any updates to mitigation measures and monitoring every two years in Sabina's annual report to the NIRB.

Sabina is required to have an annual geotechnical inspection completed by a Geotechnical Engineer of all major earthworks, between July and September. The inspection must be conducted in accordance with the *Canadian Dam Safety Guidelines* where applicable. This is a requirement of the Back River Project Type A Water Licence 2AM-BRP1831 (Part I, Item 10).

## Project Certificate Condition No. 14

Category	Waste Management Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure waste management is protective of the surrounding environment.
Term or Condition (TC)	The Proponent shall provide a Waste Management Plan that describes how the local environment, including permafrost integrity and water quality, will not be harmed by wastes at project landfills. The Proponent shall demonstrate that the use of liners at waste management facilities has been considered and adopted, wherever feasible.
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board at least 60 days prior to the start of construction, with updates provided as necessary.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board, Nunavut Water Board
Reference	Landfill and Waste Management Plan (October 2017)

## Methods:

Sabina will provide a Landfill and Waste Management Plan that describes how the local environment, including permafrost integrity and water quality, will not be harmed by wastes at project landfills. Sabina will demonstrate that the use of liners at waste management facilities has been considered.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

Sabina will submit the Landfill and Waste Management Plan to the NIRB at least 60 days prior to the start of Construction, with updates provided as necessary. Updates to the Landfill and Waste Management Plan will include commitments made through the Back River Project Type A Water Licence Technical Comments (WT-INAC-TRC-12, 13).

## Project Certificate Condition No. 15

Category	Progressive Reclamation Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure that project components, areas, and infrastructure are progressively reclaimed throughout the life of the Project.
Term or Condition (TC)	<p>The Proponent shall have in place a plan for the progressive reclamation of project components, areas, and infrastructure throughout the life of the Project. The plan shall detail:</p> <ul style="list-style-type: none"> <li>a. projected timelines for the reclamation of project features, methodologies for undertaking such activities, and monitoring measures to ensure the effectiveness of reclamation methods employed;</li> <li>b. specific measures for adaptive management and triggers for their application, should monitoring results reveal trends that could affect the reclamation and closure objectives; and,</li> <li>c. how Inuit Qaujimajatuqangit and Traditional Knowledge was collected, and used to inform closure plans and the design of project components.</li> </ul>
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 90 days prior to the start of construction, with results and details submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	Crown Indigenous Relations and Northern Affairs Canada, Environment Climate Change Canada, Nunavut Water Board, Kitikmeot Inuit Association
Reference	<p>Back River Project Interim and Closure Reclamation Plan (October 2017)</p> <p>Sabina Gold &amp; Silver Corp. Final Submission for Back River Project Type A Water Licence Public Hearing (July 2018)</p>

## Methods:

In conjunction with the Type A Water Licence Application, Sabina submitted an updated Interim Closure and Reclamation (ICRP; October 2017). The ICRP was updated to reflect NIRB Project Certificate requirement items a to c to ensure that project components, areas, and infrastructure are progressively reclaimed throughout the life of the Project. NWB in accordance with Water Licence 2AM-BRP1831, Part B, Item 14 g, approved the ICRP.

The proposed progressive reclamation activities were provided in Section 6 of the ICRP. Section 5 of the ICRP discusses the consultation and engagement aspects considered for the preparation of the ICRP.

## Results:

In July 2018, additional feedback was received from stakeholders during the Type A Water Licence regulatory review process. This feedback, as well as Sabina's final response and commitments related to progressive reclamation, will be incorporated into the next iteration of the ICRP. Sabina proposes to complete the next comprehensive iteration of the ICRP within 12 months following the commencement of the Operations Phase.

Trends:

Not applicable.

Next Steps:

Sabina will update the latest version of the ICRP (October 2017) and resubmit to the NIRB at least 60 days prior to the start of construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.



#### 4.5.5 Geological Features, Surficial and Bedrock Geology, and Geochemistry (PC TCs 16 through 18)

##### Project Certificate Condition No. 16

Category	Aggregate Sources
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure
Objective	To inform parties on the quarry or borrow materials required for the development of project infrastructure.
Term or Condition (TC)	The Proponent shall develop site-specific quarry operation and management plans in advance of the development of any potential quarry site or borrow pit.
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board and the Kitikmeot Inuit Association at least 30 days prior to the use of borrow or quarry sites for review. Information regarding the Proponent's fulfillment of this Term and Condition and identifying any amendments to existing site-specific quarry operation and management plans shall be provided annually in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Nunavut Impact Review Board
Reference	Back River Project Quarry Management Plans (NIRB PRI: 317302 and 317301)

#### Methods:

On May 2, 2018 Sabina submitted Back River Project Quarry Management Plans in fulfillment of Project Certificate T&C No.16.

#### Results:

Not applicable.

#### Trends:

Not applicable.

#### Next Steps:

Sabin will continue to provide site-specific quarry operation and management plans to the NIRB and the KIA at least 30 days prior to the use of borrow or quarry sites for review. Any amendments to existing site-specific quarry operation and management plans shall be provided in Sabina's annual report to the NIRB.

## Project Certificate Condition No. 17

Category	Monitoring of Tailings and Treatment Sludges
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Operations, Temporary Closure/Care and Maintenance
Objective	To mitigate potential impacts to the receiving environment caused by remobilization of arsenic.
Term or Condition (TC)	<p>The Proponent shall conduct tests of the tailings and treatment sludges as they are produced to evaluate the potential for remobilization of arsenic from these materials.</p> <p>Commentary: For clarity, the Proponent's testing is limited to grab sampling only and does not impose an obligation for continuous testing of tailings and treatment sludge. The parties also acknowledge that the reporting requirements apply to any remobilization of arsenic beyond levels predicted in the FEIS and FEIS Addendum.</p>
Reporting Requirement	The results of the tests should to be submitted the Nunavut Impact Review Board (NIRB), the Kitikmeot Inuit Association and other interested parties annually or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Nunavut Impact Review Board, Nunavut Water Board, Crown Indigenous and Northern Affairs Canada
Reference	Tailings Management Plan (October 2017)

## Methods:

Sabina updated the Back River Project Tailings Management Plan (October 2017) to include the commitment to evaluate the potential for remobilization of arsenic in tailings and treatment sludges (Section 4.1.2). The Tailings Management Plan was reviewed by stakeholders and approved by the Nunavut Water Board (NWB) for implementation in accordance with Part B, Item 14 of the Back River Project 2AM-BRP1831 Water Licence.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

When tailings and treatment sludges are produced and available for testing, Sabina will conduct analysis, and provide analytical results, in accordance with the Annual reporting requirements of the Project Certificate and/or Type A Water Licence requirements.

As stated in the Tailings Management Plan (October 2017), Sabina commits to provide their proposed testing method to the KIA for review and approval prior to initiating these tests.

## Project Certificate Condition No. 18

Category	Geotechnical Characterization Program
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations
Objective	To minimize the impacts of contaminated water to the groundwater and receiving environment.
Term or Condition (TC)	The Proponent shall undertake an infill geotechnical characterization program to determine the extent of the fractured bedrock contact zone and apply proposed mitigation measures as necessary. The program should include permeability testing, seepage analysis and planning for thermal monitoring of the western ridge, where appropriate.
Reporting Requirement	During construction, the Proponent shall, on an annual basis, provide information regarding the results of the infill geotechnical characterization program and any required mitigation measures in the Proponent's annual report to the Nunavut Impact Review Board. Subsequently, once monitoring has demonstrated that the area(s) assessed are stable, the Proponent shall provide information regarding any updates to the infill geotechnical characterization program and any required mitigation measures every 2 (two) years in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board, Nunavut Water Board
Reference	Not applicable

## Methods:

Sabina shall undertake an infill geotechnical characterization program to determine the extent of the fractured bedrock contact zone and apply proposed mitigation measures as necessary. The program will include permeability testing, seepage analysis and planning for thermal monitoring of the western ridge, where appropriate.

## Results:

Sabina completed an initial infill geotechnical drill program at the Goose Property in March and April of 2018. Drilling was focused on understanding proposed water management infrastructure foundations and included drill holes targeting the western ridge and the TSF Containment Dam. Field permeability (packer testing) was also completed on a subset of the drill holes. Initial results of drilling at the western ridge suggest the area does not have high permeability, with few joints and fractures present, as well as clay infilling and no visible ice within the drill hole.

No geotechnical drilling was completed in 2019. Going forward, Sabina will complete the remaining infill geotechnical drill program as part of further characterization carried out immediately prior to TSF Dam construction.

## Trends:

Not applicable.

Next Steps:

During Construction, Sabina, on an annual basis, will provide information regarding the results of the infill geotechnical characterization program and any required mitigation measures in Sabina's annual report to the NIRB. Subsequently, once monitoring has demonstrated that the area(s) assessed are stable, Sabina will provide information regarding any updates to the infill geotechnical characterization program and any required mitigation measures every two years in Sabina's annual report to the NIRB.

Note, Sabina for waste disposal/management facilities defined in the Type A Water Licence 2AM-BRP1831, will include 60 days prior to construction, final design and construction drawing accompanied by a detailed report that will include results of the infill geotechnical characterization program and a description of necessary monitoring instrumentation to confirm performance of the TSF Dam (refer to Part D, Item 4 of the Water Licence). In addition, earthworks will be inspected for stability in accordance with Geotechnical Inspection referred to in Project Certificate T&C No.12.

## 4.5.6 Hydrological Features and Hydrogeology (PC TCs 19 through 20)

## Project Certificate Condition No. 19

Category	Saline Water
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To manage saline groundwater and minimize the impacts to permafrost, soil, surface water, vegetation and wildlife.
Term or Condition (TC)	The Proponent shall, reflecting any direction from the Nunavut Water Board, maintain a saline water management plan which includes monitoring of thermal conditions, monitoring of saline water at the Goose site, and mitigation measures designed to address the potential for higher-than- predicted volumes of saline water inflows into the open pits and the underground mine, treatment and disposal methods. The plan should include accurate characterization of saline water inflows into the underground mine workings.
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 60 days prior to the commencement of operations, with results submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Water Board, Nunavut Impact Review Board, Kitikmeot Inuit Association
Reference	Water Management Plan (October 2017) Type A Water Licence 2AM-BRP1831 Technical Meeting Commitment Responses (June 2018)

## Methods:

Sabina will maintain a saline water management plan which includes monitoring of thermal conditions, monitoring of saline water at the Goose site, and mitigation measures designed to address the potential for higher-than- predicted volumes of saline water inflows into the open pits and the underground mine, treatment and disposal methods. The plan will include accurate characterization of saline water inflows into the underground mine workings.

Sabina is required under Part E, Item 2 of the Back River Project 2AM-BRP1831 Water Licence to submit a revised Water Management Plan which includes an updated Saline Water Management Plan appendix.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

The plan will be submitted to the NIRB at least 60 days prior to the commencement of Operations, with results submitted annually thereafter or as may otherwise be required by the NIRB. Consistent with the 2AM-BRP1831 Water Licence Terms and Condition, Sabina will submit an updated Water Management Plan which includes a Saline Water Management Plan appendix.

## Project Certificate Condition No. 20

Category	Thermal Monitoring
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To minimize the impacts of contaminated water to the groundwater and receiving environment.
Term or Condition (TC)	The Proponent shall develop a thermal monitoring plan to address the potential changes in permafrost/talik distribution, flow distribution and flow paths that may be directly or indirectly affected by the Project facilities and activities. Thermal monitoring should be considered at a minimum for the critical cross sections of the Main Dam, Llama Pit, and Umwelt Pit.
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 60 days prior to the start of construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board, Nunavut Water Board
Reference	Not applicable

## Methods:

Sabina will develop a thermal monitoring plan to address the potential changes in permafrost/talik distribution, flow distribution, and flow paths that may be directly or indirectly affected by the Project facilities and activities. Thermal monitoring shall be considered at a minimum for the critical cross sections of the Main Dam, Llama Pit, and Umwelt Pit.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

Sabina will submit a thermal monitoring plan to the NIRB at least 60 days prior to the start of Construction, with updates provided as necessary.

## 4.5.7 Groundwater and Surface Water Quality (PC TCs 21 through 22)

## Project Certificate Condition No. 21

Category	Aquatic Effects Monitoring Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to groundwater and surface waters.
Term or Condition (TC)	<p>The Proponent shall, reflecting any direction from the Nunavut Water Board, maintain an Aquatic Effects Monitoring Plan (AEMP) designed to:</p> <ul style="list-style-type: none"> <li>- determine the short and long-term effects in the aquatic environment resulting from the Project;</li> <li>- evaluate the accuracy of Project effect predictions;</li> <li>- assess the effectiveness of mitigation and management measures on Project effects;</li> <li>- identify additional mitigation measures to avert or reduce environmental effects due to Project activities; and</li> <li>- comply with Metal Mining Effluent Regulations requirements, should an Environmental Effects Monitoring program be triggered.</li> </ul> <p>The AEMP should include sufficient sampling and monitoring programs to appropriately characterize the receiving environment to ensure that adequate data is available to assess impact predictions made within the Final Environmental Impact Statement.</p>
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 90 days prior to the start of construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Water Board, Environment Climate Change Canada, Nunavut Impact Review Board
Reference	Aquatic Effects Monitoring Plan (October 2017)

## Methods:

Sabina will develop and submit to the NIRB an AEMP that includes sufficient sampling and monitoring programs to appropriately characterize the receiving environment to ensure that adequate data is available to assess impact predictions made within the Final Environmental Impact Statement.

The NWB issued the 2AM-BRP1831 Type A Water Licence to Sabina on September 21, 2018. The NWB directed under the Type A Water Licence 2AM-BRP1831 that Sabina submit to the NWB:

- for review with the 2018 Annual Report an updated Water and Load Balance Model as and appendix to the approved Water Management Plan, taking into account updated 2017-2018 baseline data collection that takes into account season variation (Part E, Item 15); and
- for approval prior to March 31, 2019, an updated Aquatic Effects Management Plan. The update shall address all comments and commitments made during the regulatory review of the Application (Type A Water Licence Application (October 2017). (Part I, Item 2)

Sabina undertook a 2018 supplementary baseline sampling program to support the design and implementation of the AEMP, address relevant commitments made by Sabina through the water licensing process. The 2018 program was discussed and agreed upon with ECCC on July 20, 2018, prior to program commencement.

Results:

An aquatic baseline synthesis report will be drafted to report the results of the AEMP 2018 sampling program and evaluate the pre-development data set with a focus on addressing commitments made during regulatory review of the Water Licence Application. As such, updates to the AEMP will refer to the aquatic baseline synthesis report to be submitted in parallel with the updated AEMP. Thus, updates to the AEMP will be concise and well supported by the more detailed baseline synthesis report. The study design will also be reviewed for compliance with the recently released Metal and Diamond Mining Effluent Regulations (MDMER) given that the mine will be subject to both the AEMP and Environment Effects Monitoring under the MDMER.

The aquatic baseline synthesis report will:

- Report the 2018 sampling event and data
- Document compilation of the pre-development dataset
- Evaluate the pre-development dataset and provide a synthesis of results - guided by commitments made by Sabina during regulatory review of the Water Licence Application and information needed to update the AEMP and the Water and Load Balance Model
- Prepare a summary and conclusion section

Trends:

Not applicable.

Next Steps:

Sabina will submit an updated AEMP to the NIRB at least 90 days prior to the start of Construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.

Sabina will also submit an updated AEMP consistent with the terms and conditions of the Back River Project 2AM-BRP1831 Water Licence.



## Project Certificate Condition No. 22

Category	Site Water Monitoring and Management Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To minimize the use of natural waters as practicable and limit potential impacts to the receiving environment from contact (site) water.
Term or Condition (TC)	The Proponent shall, reflecting any direction from the Nunavut Water Board, maintain a Site Water Monitoring and Management Plan designed to: minimize the amount of water that contacts mine ore and wastes; appropriately manage all contact water and discharges to protect local aquatic resources; and, implement water conservation and recycling to maximize water reuse and minimize the use of natural waters. The plan should include monitoring that demonstrates contact water (runoff and shallow groundwater) from the ore storage and waste rock storage areas is adequately captured and managed, as per the Mine Waste Rock Management Plan.
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 90 days prior to the start of construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Water Board, Nunavut Impact Review Board, Kitikmeot Inuit Association, Environment and Climate Change Canada, Crown- Indigenous Relations and Northern Affairs Canada
Reference	Water Management Plan (October 2017)  Type A Water Licence 2AM-BRP1831

### Methods:

Sabina updated the Water Management Plan (WMP; October 2017) to include consideration for:

- o minimizing the amount of water that contacts mine ore and wastes (Section 8.1.6 and Section 9);
- o appropriate management of all contact water and discharges to protect local aquatic resources (Section 8.1.9 and Section 9); and
- o implementation of water conservation (Section 9.3) and recycling efforts to maximize water reuse (Section 9.2) and minimize the use of natural waters.

The updated WMP includes monitoring that demonstrates contact water (runoff and shallow groundwater) from the ore storage and waste rock storage areas is adequately captured and managed, as per the Mine Waste Rock Management Plan (October 2017) and Ore Storage Management Plan (October 2017). The WMP, Mine Waste Rock Management Plan, and Ore Storage Management Plan were reviewed by stakeholders and approved by the NWB for implementation in accordance with Part B, Item 14 of the Back River Project 2AM-BRP1831 Water Licence.

On November 6, 2018, the approved Water Licence confirmed, NWB direction to update the Site Water Management Plan to include:

- Saline Water Management Plan (Project Certificate T&C No.19);
- further detail respecting potential management and treatment options related to water quality in the effluent discharged from flooded pits and the downstream receiving environment.
- commitments made with respect to submissions received during the technical review of the Water Licence Application, as well as final submission and issues raised during the NWB Public Hearing process;
- 2017-2018 baseline data collections that take into account season variation; and
- an updated water and load balance model as well as a hydrodynamic model.

Results:

Not applicable.

Trends:

Not applicable.

Next Steps:

Sabina is undergoing a fulsome update to the WMP as directed by the NWB in 2019. The WMP will be submitted to the NIRB at least 90 days prior to the start of Construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.

## 4.5.8 Freshwater Aquatic Environment (PC TCs 23 through 31)

## Project Certificate Condition No. 23

Category	Setbacks
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Construction, Operations, Temporary Closure/Care and Maintenance, Closure
Objective	To mitigate impacts of runoff/sedimentation into freshwater aquatic habitat.
Term or Condition (TC)	The Proponent shall maintain an appropriate setback distance between project quarries and fish-bearing or permanent waterbodies, or implement appropriate mitigation measures, as required to prevent acid rock drainage or metal leaching into such waterbodies.
Reporting Requirement	Throughout quarry development and operation, the Proponent shall, on an annual basis, provide information regarding quarry setback distances maintained and/or mitigation measures implemented by the Proponent in fulfillment of this Term and Condition in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board, Fisheries and Oceans Canada, Nunavut Water Board
Reference	Borrow Pits and Quarry Management Plan Type B Development Works Water Licence (August 2017, Ver 2.0) (NIRB PRI: 317301)  Borrow Pits and Quarry Management Plan (October 2017)  Water Management Plan (October 2017)

## Methods:

Sabina maintains a suite of management plans which implement appropriate mitigation measures related to quarry development and operation at the Back River Project:

- Borrow Pits and Quarry Management Plan for the Type B Development Works Water Licence (August 2017, Ver 2.0); Approved by NWB Type B, Part E, Item 3 on issuance of licence on March 13, 2018.
- Approved Borrow Pits and Quarry Management Plan (October 2017)
- Approved Water Management Plan (October 2017)

Sabina's management plans outline a minimum setback for quarries of 31 m from the ordinary high water mark of any waterbody.

Results:

In 2018, under the Back River Project Initial Development Works Type B Water Licence 2BC-BRP1819, Sabina developed and operated the MLA Quarry and expanded the Airstrip Quarry. Sabina notes that both the MLA and Airstrip quarries maintain the minimum 31 m setback from the highwater mark of any waterbody. The Airstrip Quarry is located approximately 300 m from the highwater mark of the nearest waterbody, while the MLA Quarry is located approximately 600 m from the highwater mark of the nearest waterbody.

On May 2, 2018 Sabina submitted Back River Project Quarry Management Plans in fulfillment of Project Certificate T&C No.16.

In 2019, Sabina did not develop, or expand, new or existing quarries at the Back River Project.

Trends:

Not applicable.

Next Steps:

Throughout quarry development and operation, Sabina will, on an annual basis, provide information regarding quarry setback distances maintained and/or mitigation measures implemented by Sabina in fulfillment of this T&C in Sabina's annual report to the NIRB.

Sabina is required in accordance with the Back River Project Type A Water Licence 2AM-BRP1831(Part D, Item 9), to conduct visual inspection for runoff/seepage, and conduct sampling where turbidity is observed, for all construction activities during spring freshet and during and after remarkable rainfall events.

## Project Certificate Condition No. 24

Category	Watercourses
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To prevent blockages or restrictions to fish passages.
Term or Condition (TC)	The Proponent shall ensure that all project infrastructure in watercourses are designed and constructed in such a manner that they do not unduly prevent and limit the movement of water in fish bearing streams and rivers, unless otherwise authorized by Fisheries and Oceans Canada.
Reporting Requirement	Information regarding design, construction and inspection measures implemented by the Proponent in fulfillment of this Term and Condition shall be provided in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Not Applicable
Reference	<p>Rascal Stream West Fish Habitat Assessment - Appendix G</p> <p>Back River Project Early Works - Request for Review Application (submitted February 27, 2018)</p> <p>Fisheries and Oceans Canada - Letter of Advice: Implementation of mitigation measures to avoid and mitigate serious harm to fish and fish habitat for the early development work activities at the Goose property for the Back River Project 18-HCAA-00185 (letter dated May 2, 2018)</p>

### Methods:

A clear-span bridge was installed above the high-water mark and without any instream structures at the Gander Outflow crossing (see attached pre-construction engineered drawings). The bridge was constructed without fording the stream. As the installation of the single-span bridge did not involve any instream works or removal of materials from below the high-water mark, fish passage monitoring during construction activities was not required. However, sediment and erosion control measures were implemented as per condition 18 in Part E of the Type B Water Licence (No. 2BC-BRP1819). The use of a single-span bridge provides unrestricted flows for passage of fish and negates any potential of causing Serious Harm to fish and meeting the conditions of the Letter of Authorization from DFO (DFO File No. 18-HCAA-00185).

### Results:

In 2019, a study was completed to survey fish habitat conditions during spring flows at the newly constructed clear span crossing over the lower reach of Rascal Stream West, also referred to as Gander Pond Outflow. The 2019 study of fish habitat collected environmental data on the following:

- Dominant habitat types and habitat quality for Arctic Grayling in Rascal Stream West
- Physical dimensions and composition substrate of each habitat unit
- Nephelometric turbidity unit (NTUs) measurements
- Photographs of delineated habitat units and potential barriers to fish movements

The 2019 field study also collected supplemental hydrological measurements on spring flow conditions upstream of the newly constructed clear span crossing to inform the evaluation of the water management options related to the proposed airstrip expansion.

Results of the field study illustrated the clear span was designed and constructed in such a manner to not unduly prevent or limit the movement of water in Rascal Stream West.

Trends:

Not applicable.

Next Steps:

Monitoring and/or inspections will continue to be conducted during freshet to ensure no impact to Arctic Grayling is observed.

## Project Certificate Condition No. 25

Category	Blasting
Responsible Parties	Sabina Gold & Silver Corp., Fisheries and Oceans Canada
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure
Objective	To mitigate impacts of explosives use on fish and fish habitat.
Term or Condition (TC)	The Proponent shall engage with Fisheries and Oceans Canada in exploring possible project specific thresholds, mitigation and monitoring for blasting that would exceed the requirements of Fisheries and Oceans Canada's Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters (D.G. Wright and G.E. 6", 1998).
Reporting Requirement	Information regarding the thresholds adopted, mitigation and/or monitoring measures associated with blasting developed and implemented by the Proponent in fulfillment of this Term and Condition shall be provided in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Not Applicable
Reference	Environmental Impact Assessment Statement Supporting Volume 10: Management Plans; 13. Explosives Management Plan (2013).  Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters (1998)

### Methods:

Any blasting or use of explosives that occurs within the blasting setbacks, as outlined in the Guideline of the Use of Explosives In or Near Canadian Fisheries Waters (DFO 1998), will require consultation with DFO. Consultation with DFO will work to possibly identify project specific thresholds, mitigation and monitoring that would exceed the DFO guidelines. Current blasting activities have all taken place outside the DFO setbacks.

### Results:

Not Applicable. No blasting within the required setbacks outlined by DFO occurred in 2019. Commitments in the Explosives Management Plan indicate that consultation with DFO will commence any blasting activities are planned near fish bearing waters.

### Trends:

Not Applicable. No blasting within the required setbacks outlined by DFO occurred in 2019. Consultation with DFO will commence specific to any blasting activities near fish bearing waters in 2020.

### Next Steps:

Consultation with DFO will commence specific to any blasting activities near fish bearing waters in 2020.

## Project Certificate Condition No. 26

Category	Fish Passage
Responsible Parties	Sabina Gold & Silver Corp. (Sabina), Kitikmeot Inuit Association (KIA), Fisheries and Oceans Canada (DFO)
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To minimize potential impacts to the migration of Arctic Grayling.
Term or Condition (TC)	The Proponent shall engage Fisheries and Oceans Canada, the Kitikmeot Inuit Association, and other interested parties during the regulatory phase on the design, construction, and operation of adequate fish passage to permit migration of Arctic Grayling from Goose Lake to natural spawning and rearing habitat located in upper Rascal Stream East, south of the planned airstrip. Any additional information required to ensure the design of the fish passage will be completed prior to significant construction activities at the Goose Property.
Reporting Requirement	The updated information should be submitted to the Nunavut Impact Review Board (NIRB) at least 30 days prior to construction of the fish passage, with results submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	Draft Final Offsetting Plan was submitted to DFO for review on September 12, 2018 A meeting with Tania Gordanier (DFO manager of major projects) was held in Ottawa to discuss the Draft Final Offsetting Plan on September 26, 20-18 Reply to DFO Questions on the Draft Final Offsetting Plan was submitted to DFO on October 23, 2018 A meeting in DFO's Yellowknife office was held to discuss the offsetting plan on November 21, 2018
Reference	Rascal Stream Fishway Hydrotechnical Assessment (January 2018)  Draft Final Offsetting Plan (submitted September 2018 to DFO)

## Methods:

In 2018, continued collaboration with DFO and stakeholders on ideal design for the Rascal Stream East Fishway was undertaken concurrent with regulatory review of the Project and the Offsetting Plan was updated to reflect feedback received. The final version of the Offsetting Plan was submitted in 2019, however, it did not include the final design of the Rascal Stream Fishway under the proposed airstrip extension. Sabina chose to defer the final design in the Offsetting Plan due to ongoing additional design, baseline data collection, and hydrological modelling underway; Sabina anticipates finalizing an assessment within the coming weeks to months which will be provided for regulatory review.

## Results:

Not applicable. Design and offsetting discussions are ongoing. Construction of airstrip has not commenced.



Trends:

Not applicable. Design and offsetting discussions are ongoing. Construction of airstrip has not commenced. A clear-span bridge was installed at the Gander Outflow during all-weather access road construction in 2018 as part of the commitment to DFO to maintain passage for Arctic Grayling.

Next Steps:

Collaboration with DFO, KIA, and other interested parties will continue into 2020. Once proposed fishway designs and monitoring plans are accepted and/or approved by DFO and KIA, detailed plans for construction and ongoing monitoring will be implemented in compliance with DFO/KIA requirements and any further commitments made by Sabina (if applicable). The final design and monitoring plans will be submitted to the NIRB at least 30 days prior to construction of the fish passage.

## Project Certificate Condition No. 27

Category	Water Withdrawal Sites
Responsible Parties	Sabina Gold & Silver Corp., Nunavut Water Board, Fisheries and Oceans Canada
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To minimize impacts to freshwater fish habitat that may be used for water withdrawal.
Term or Condition (TC)	The Proponent shall provide bathymetry, depth, and location of proposed water withdrawal sites, volumes to be extracted, anticipated water level decreases, and fish habitat features within each waterbody proposed to be used for winter water withdrawal in support of the annual construction of the winter ice roads. If additional waterbodies are required the Proponent shall provide all required information on the additional proposed lakes prior to the use of the waterbodies.
Reporting Requirement	The information for each waterbody should be provided to the Nunavut Impact Review Board (NIRB), Fisheries and Oceans Canada (DFO), and the Nunavut Water Board (NWB) during the regulatory phase. Information on additional waterbodies should be provided to the NIRB, the DFO, the NWB, and other interested parties at least 90 days prior to the start of water withdrawal or as otherwise directed by DFO or the NWB.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Water Board, Fisheries and Oceans Canada
Reference	Technical Memorandum, Winter Ice Road Water Withdrawal Evaluation (November 2018)  Fisheries and Oceans Canada - Letter of Advice: Implementation of mitigation measures to avoid and mitigate serious harm to fish and fish habitat during the construction of the Winter Ice Road for the Back River Project 18-HCAA-01626 (letter dated December 20, 2018)  Winter Ice Road Request for Review Application (submitted November 2018)

## Methods:

Subsequent to the Environmental Assessment review process and receipt of Project Certificate, Sabina submitted a Request for Review for Winter Ice Road to DFO in February 2018. In November 2018 Sabina provided the NIRB, DFO, and NWB with a detailed Technical Memorandum for Water Withdrawal Evaluation for proposed water withdrawal planned for 2019. On December 20, 2018 DFO confirmed no serious harm to fish would occur and similarly on December 18, 2018, the NWB confirmed WIR tech memo met requirements of the Type A. Construction of the ice road took place in 2019.

In 2017, Sabina completed an evaluation of potential water sources for winter ice road construction along the proposed 160-km long winter road corridor from the Goose Property at Goose Lake to the Marine Laydown Area at Bathurst Inlet. Bathymetric digital elevation models were generated for 118 waterbodies within the winter road corridor using imagery collected in August 2017. Detailed lakebed topography was identified to a depth of 30 m. Based on these bathymetric models, analysis of volume and area per depth could be completed to estimate available under-ice water volumes for ice road construction from each source lake (i.e., 10% of under ice volume).

**Results:**

Of the 118 waterbodies examined, 55 lakes were identified as being sufficient for under-ice withdrawal. No measurable effects are predicted for fish and fish habitat for the identified source lakes as the recommended under-ice volumes will be adhered to and have been acknowledged to be protective by DFO. In 2019, Sabina's water usage for construction and operation of the winter ice road remained with the recommended under-ice volumes from the identified 55 lakes. Additional details on water source locations and volumes can be found in Sabina's Type A Water Licence (2AM-BRP1831) annual report.

**Trends:**

Not applicable.

**Next Steps:**

Sabina is required to comply with Type A Water Licence 2AM-BRP1831, Part E, Item 5 for the use of freshwater from sources proximal to the WIR for the purpose of construction, maintenance and operation of the WIR. In addition, at least 60 days prior to annual construction, Sabina is required to submit a technical memorandum under Part E, Item 13 including projected routing, bathymetry, depth, potential location of water withdrawal, proposed volumes and anticipated water level decreases.

## Project Certificate Condition No. 28

Category	Winter Ice Road
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate impacts to fish and fish habitat.
Term or Condition (TC)	The Proponent shall implement all applicable Fisheries and Oceans Canada best management practices to avoid and mitigate serious harm to fish as a result of the construction, operation, and decommissioning of winter ice roads, and from under ice water withdrawals. This includes adequately screening the water intakes pipes to prevent impingement and entrainment of fish.
Reporting Requirement	Information regarding best management practices and/or mitigation measures implemented by the Proponent in fulfillment of this Term and Condition shall be provided in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Not Applicable
Reference	Technical Memorandum, Winter Ice Road Water Withdrawal Evaluation (November 2018) Fisheries and Oceans Canada - Letter of Advice: Implementation of mitigation measures to avoid and mitigate serious harm to fish and fish habitat during the construction of the Winter Ice Road for the Back River Project 18-HCAA-01626 (letter dated December 20, 2018) Winter Ice Road Request for Review Application (submitted November 2018) Back River Project - Road Management Plan (October 2017)

## Methods:

Construction of the Winter Ice Road took place in 2019. Methods to avoid serious harm to fish were outlined in the Technical Memorandum (November 2018). Sabina commitment to follow DFOs best management practises were stated in the Winter Ice Road Request for Review (February 2018) document. The Request for Review Response from DFO, received by Sabina in December 2018, acknowledged that if all methods as proposed by Sabina out were followed, no serious harm to fish was expected to occur.

## Results:

Successful construction and operation of the winter ice road took place in 2019. All methods to avoid serious harm to fish were followed as outlined in the Technical Memorandum (November 2018), as well as DFOs best management practises stated in the Winter Ice Road Request for Review (February 2018) document.

## Trends:

Not Applicable.

Next Steps:

All commitments made in the DFO Request for Review, Winter Ice Road Technical Memorandum (November 2018), and Road Management Plan will continue to be followed. Of note, Sabina is required to comply with Type A Water Licence 2AM-BRP1831, Part E, Item 7, wherein, Sabina shall equip all water intake hoses with a screen of an appropriate mesh size to ensure that fish are not entrained and shall withdraw water at a rate such that fish do not become impinged on the screen.

## Project Certificate Condition No. 29

Category	Water Crossings
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate impacts to fish and fish habitat.
Term or Condition (TC)	The Proponent shall implement all applicable Fisheries and Oceans Canada best management practices to avoid and mitigate serious harm to fish as a result of water crossing construction, operation, and decommissioning for all fish-bearing water crossings. These measures should include, but are not limited to, appropriate design of water crossings to facilitate fish passage at both high and low flows, timing windows that incorporate spawning, incubation and hatch times for all species using watercourses, sediment and erosion control, protection of riparian vegetation, and other forms of bank stabilization
Reporting Requirement	Information regarding best management practices and/or mitigation measures implemented by the Proponent in fulfillment of this Term and Condition shall be provided in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Not Applicable
Reference	Back River Project - Road Management Plan (October 2017) Back River Project Early Works - Request for Review Application (submitted February 27, 2018) Fisheries and Oceans Canada - Letter of Advice : Implementation of mitigation measures to avoid and mitigate serious harm to fish and fish habitat for the early development work activities at the Goose property for the Back River Project 18-HCAA-00185 (letter dated May 2, 2018)

## Methods:

A clear-span bridge was installed above the high-water mark and without any instream structures at the Gander Outflow crossing (see attached pre-construction engineered drawings). The bridge was constructed without fording the stream. As the installation of the single-span bridge did not involve any instream works or removal of materials from below the high-water mark, fish passage monitoring during construction activities was not required. However, sediment and erosion control measures were implemented as per condition 18 in Part E of the Type B Water Licence (No. 2BC-BRP1819). The use of a single-span bridge provides unrestricted flows for passage of fish and negates any potential of causing Serious Harm to fish and meeting the conditions of the Letter of Authorization from DFO (DFO File No. 18-HCAA-00185).

## Results:

The use of a clear-span bridge did not involve any instream works, or removal of structures below the high-water mark, therefore maintaining the conditions of the DFO Letter of Advice for maintaining unrestricted flows for passage of fish and eliminating potential for serious harm to fish at this crossing. As no instream work was required for the installation of a clear-span bridge, no turbidity monitoring was required during construction. Erosion and sediment control structures were installed as per the commitments made in the Road Management Plan.

In 2019, a study was completed to survey fish habitat conditions during spring flows at the newly constructed clear span crossing over the lower reach of Rascal Stream West, also referred to as Gander Pond Outflow. The 2019 study of fish habitat collected environmental data on the following:

- Dominant habitat types and habitat quality for Arctic Grayling in Rascal Stream West
- Physical dimensions and composition substrate of each habitat unit
- Nephelometric turbidity unit (NTUs) measurements
- Photographs of delineated habitat units and potential barriers to fish movements

The 2019 field study also collected supplemental hydrological measurements on spring flow conditions upstream of the newly constructed clear span crossing to inform the evaluation of the water management options related to the proposed airstrip expansion.

Results of the field study illustrated the clear span was designed and constructed in such a manner to not unduly prevent or limit the movement of water in Rascal Stream West.

Trends:

Not applicable.

Next Steps:

Monitoring and/or inspections will continue to be conducted during freshet to ensure no impact to Arctic Grayling is observed.

## Project Certificate Condition No. 30

Category	Monitoring Program for Culverts
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To minimize the impacts to fish bearing watercourses.
Term or Condition (TC)	Unless otherwise directed by Fisheries and Oceans Canada, the Proponent's monitoring program for culverts on fish bearing watercourses during the operations and closure phases shall include measures to ensure that barriers to fish passage do not form over time as a result of crossing damage due to ice blockage, flooding, or movement of debris; all of which may occur at freshet. Detailed design drawings and an updated monitoring program shall be produced prior to construction.
Reporting Requirement	The updated drawings and monitoring program should be submitted to the Nunavut Impact Review Board (NIRB) and Fisheries and Oceans Canada (DFO) at least 30 days prior to the construction of the culverts, with results submitted annually thereafter or as may otherwise be required by the NIRB and DFO.
Status of Compliance	Compliant
Stakeholder Review	Fisheries and Oceans Canada
Reference	Back River Project Early Works - Request for Review Application (submitted February 27, 2018) Fisheries and Oceans Canada - Letter of Advice: Implementation of mitigation measures to avoid and mitigate serious harm to fish and fish habitat for the early development work activities at the Goose property for the Back River Project 18-HCAA-00185 (letter dated May 2, 2018)

## Methods:

In 2018, a clear-span bridge was installed for the crossing at the Gander Outflow; no culverts for crossing structures have been installed at the Back River Project.

## Results:

Not Applicable. No culvert crossings were installed.

## Trends:

Not applicable.

## Next Steps:

Monitoring program for culverts on fish bearing watercourses during the operations and closure phases shall include measures to ensure that barriers to fish passage do not form over time as a result of crossing damage due to ice blockage, flooding, or movement of debris; all of which may occur at freshet.



**Project Certificate Condition No. 31**

Category	Monitoring Program for Culverts
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To minimize the impacts to fish and fish habitat.
Term or Condition (TC)	The Proponent should provide annual monitoring updates regarding the Rascal Stream Fish Passage that enables parties to determine its effectiveness.
Reporting Requirement	Monitoring updates regarding the Rascal Stream Fish Passage shall be included in the annual report to the NIRB. In years when monitoring is not required by Fisheries and Oceans Canada, the Proponent will include a statement in the annual report confirming no active monitoring has occurred.
Status of Compliance	Compliant
Stakeholder Review	Fisheries and Oceans Canada
Reference	Not Applicable

**Methods:**

Not applicable. No construction on the Rascal Stream Fish Passage (i.e., 'fishway') has occurred to date.

**Results:**

Not applicable.

**Trends:**

Not applicable.

**Next Steps:**

No work on the Rascal Stream Fish Passage has occurred to date. Sabina will conduct monitoring if any construction occurs in 2020 and present the results as part of the NIRB annual Report. An evaluation of flow scenarios was conducted in 2019 and will continue in 2020 in coordination with DFO.

## 4.5.9 Vegetation (PC TCs 32 through 36)

## Project Certificate Condition No. 32

Category	Site Footprint
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To minimize the impacts of the Project on vegetation.
Term or Condition (TC)	The Proponent shall ensure that Project activities are planned and conducted in such a way as to minimize the Project footprint.
Reporting Requirement	In the Proponent's annual report to the Nunavut Impact Review Board, the Proponent shall provide information regarding the current Project footprint, taking into account construction and progressive reclamation activities, and including information regarding the loss or alteration of vegetation associated with Project activities (including identifying the type of any habitat losses resulting from these effects).
Status of Compliance	Compliant
Stakeholder Review	None
Reference	Vegetation Monitoring Plan (January 2020) Vegetation Monitoring Program (Golder 2019). This document is attached in Appendix C.

## Methods:

To quantify the potential impacts on vegetation, a Vegetation Monitoring Plan (Golder 2019; Appendix C) was implemented in 2019 for the Winter Ice Road connecting the MLA and the Goose Property.

A revised Vegetation Monitoring Plan was provided to the NIRB in January 2020 following a recommendation from the NIRB and incorporated reviewer's comments.

## Results:

There was no new construction that occurred at the MLA or at the Goose site in 2019. Therefore, the Project footprint and any loss or alteration of vegetation associated with it, remains the same as in 2018.

## Trends:

Not applicable. On-going annual vegetation monitoring will continue.

## Next Steps:

Annual vegetation monitoring will continue to identify any loss or alteration of vegetation associated with increases to the Back River Project footprint.

### Project Certificate Condition No. 33

Category	Invasive Species
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To prevent the introduction of invasive species.
Term or Condition (TC)	The Proponent shall ensure that equipment and supplies brought to the project sites are clean and free of soils that could contain plant seeds not naturally occurring in the area. Vehicle tires and treads in particular must be inspected prior to initial use in project areas. The Proponent shall also incorporate protocols for monitoring for the potential introduction of invasive vegetation species (e.g. surveys of plant populations in previously disturbed areas) into relevant monitoring and management plans for the terrestrial environment. Any introductions of non-indigenous plant species must be promptly reported to the Government of Nunavut Department of Environment.
Reporting Requirement	At least 30 days prior to first shipment of equipment and supplies to the site, the Proponent's mitigation plans, protocols, monitoring and inspection program required in fulfillment of this Term and Condition shall be provided to the Nunavut Impact Review Board for review. Subsequently, information regarding inspections, monitoring results and any reports to the Government of Nunavut Department of Environment as referenced above shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	None
Reference	Vegetation Monitoring Plan (January 2020)

#### Methods:

On February 16, 2018 Sabina provided to the NIRB a Standard Operating Procedure (SOP) which ensures all equipment and bulk supplies arriving at the Back River Project site are in a condition free of any soil or plant debris to minimize the risk of invasive plant introduction.

Invasive plant species monitoring will occur during Construction and Operations of the Project. Invasive plant monitoring will be completed within the Goose Property, MLA, and WIR footprint and adjacent habitats. Invasive plant observations will be conducted every three years in conjunction with the vegetation monitoring programs. Informal invasive surveys will occur on an ongoing basis and additional surveys may be triggered by incidental observations. Invasive plant species will be immediately reported to environment department and control measures implemented to reduce / eliminate further introduction and spread.

#### Results:

Expediter verification forms confirming equipment and bulk supplies destined for the Back River Project are free of soil and plant debris upon shipment are provided in Appendix B of this NIRB annual report.

The Vegetation Monitoring Program (2020) will be implemented once the Project enters the Construction Phase.

Trends:

Not applicable.

Next Steps:

Sabina will continue to provide completed expediter verification forms confirming equipment and bulk supplies destined for the Back River Project are free of soil and plant debris upon shipment in the NIRB annual report.

Once the Project enters Construction, invasive plant species monitoring will be conducted as per Vegetation Monitoring Program (2020).

## Project Certificate Condition No. 34

Category	Vegetation Monitoring Plan
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Inuit Association, the Government of Nunavut
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To minimize potential impacts to vegetation along the winter road/trail routings and around project sites.
Term or Condition (TC)	<p>The Proponent shall have in place a Vegetation Monitoring Plan that is designed to quantify the potential impacts on vegetation from the Project, including the annual construction/operation of the winter ice roads and trails. The plan should include all commitments discussed throughout the Review of the Project, including commitments to consult with the Kitikmeot Inuit Association, the Government of Nunavut, and other relevant parties, as well as:</p> <ul style="list-style-type: none"> <li>a. Establishment of pre-construction and post-operation vegetation conditions annually with supporting photographs to allow for long- term comparisons of vegetation conditions along winter ice road/trail routings and around project sites;</li> <li>b. Incorporation of measures to prevent or minimize potential destabilization and erosion along winter ice road/trail routings and around project sites;</li> <li>c. Details on the triggers for implementing adaptive management options if effects to vegetation are observed, including potential impacts from dust deposition; and,</li> <li>d. Discussion of how the findings from monitoring efforts would be used to inform reclamation planning.</li> </ul>
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 90 days prior to the start of construction, with results submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	None
Reference	Vegetation Monitoring Plan (January 2020) Vegetation Monitoring Program (Golder 2019). This document is attached in Appendix C.

## Methods:

Sabina provided a Vegetation Monitoring Plan (January 2020) to the NIRB on January 23, 2020, that is designed to quantify the potential impacts on vegetation from the Project, including the annual construction/operation of the winter ice roads and trails. The plan includes all commitments discussed throughout the Review of the Project, including commitments to consult with the Kitikmeot Inuit Association, as well as the Project Certificate (No. 007) Term and Condition No. 34 requirements.

In addition, a Vegetation Monitoring Program (Golder 2019) was implemented in 2019 for the Winter Ice Road connecting the MLA and the Goose Property. The Vegetation Monitoring Program can be found in Appendix C.

## Results:

Baseline vegetation plot establishment and data collection was initially completed from July 11 to 16, 2018. A total of 72 baseline vegetation monitoring plots were established, (36 reference and 36 experimental) using a paired plot design along the proposed WIR alignment in 2018. Sabina's construction and operation of the inaugural WIR in 2019 resulted in several small route optimizations which caused a portion of the experimental plots to fall outside of the current footprint. In 2019, a total of 15 experimental plots were relocated to coincide with the WIR alignment and provide sufficient experimental plot coverage on the WIR footprint. An additional 14 vegetation plots (7 reference and 7 experimental) were established to provide coverage in a range of vegetation types along the WIR alignment.

An additional 5 unpaired vegetation monitoring plots were established in close proximity to each of the MLA and Goose Property footprints to capture any project related effects. Data was collected from July 24 to 31, 2019 from a total of 56 vegetation monitoring plots (46 paired experimental/reference, 10 stand alone experimental).

Detailed plots were assessed by a vegetation ecologist and included an inventory of plant species present by vegetation strata layer, ground cover, and detailed site information. Vegetation association and other data collected at each site included:

- relative abundance (percent cover) and richness of vascular plant and non-vascular species;
- average heights of plant species observed;
- vigour class or overall plant health of vascular plant species;
- relative abundance (percent cover) of surface substrate materials;
- dominant structural stage, moisture regime, and nutrient regime; and
- wildlife sign (e.g., fecal pellets, browsing/grazing, beds, digging) observations, if present.

Lichen species richness and percent cover were classified into ground-dwelling (terricolous) and rock lichens (saxicolous).

Overall, the results of the 2019 field surveys of the WIR show impacts to the vegetation ranging from low to very high, with the majority (75%) of vegetation plots surveyed showing low to no disturbance with 75% of plots exhibiting no disturbance. A number of measures should continue to be implemented to help mitigate the effects of WIR on local vegetation including:

- Minimizing WIR footprint thereby minimizing disturbance to terrestrial environment;
- All vehicle traffic restricted to designated road surfaces including consideration of additional WIR route demarcation;
- Load allowance do not exceed design of WIR;
- Vehicles driven at designated speeds along WIR; and
- Travel on WIR only when conditions permit.

Refer to Appendix C for comprehensive 2019 vegetation survey results.

## Trends:

Not applicable.

## Next Steps:

Annual vegetation monitoring will continue to inform adaptive management strategies and provide early warning of undesirable change to the environment. If data indicates increasing disturbance to vegetation, additional mitigation options will be considered.

## Project Certificate Condition No. 35

Category	Revegetation and Reclamation
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To maximize revegetation in reclaimed areas.
Term or Condition (TC)	The Proponent shall develop a progressive revegetation program for disturbed areas that are no longer required for operations, such as a program to incorporate measures for the use of test plots, reseeding, and replanting of native plants as necessary. It is further recommended that this program be directly associated with the management plans for erosion control established for the Project.
Reporting Requirement	The program and associated revegetation results should be provided within the Proponent's annual report submitted to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	None.
Reference	Incorporated within the Interim Closure and Reclamation Plan (ICRP; October 2017).

## Methods:

Potential revegetation of areas that are no longer required for operations, including active revegetation, seeding, and soil amendment will be reviewed by Sabina. Given the cold climate setting of the Project, and precedent established by other Nunavut mine closures, grading and contouring will also be reviewed to control soil stability and to promote revegetation by natural colonization. Sabina has and will continue to include possible revegetation strategies within its Closure and Reclamation Plan (October 2017).

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

In-line with Project Certificate T&C No.36, within three years from the commencement of Construction, information regarding the revegetation strategies developed and implemented by Sabina in fulfillment of this T&C will be included in Sabina's annual report to the NIRB. Subsequently, information regarding the Proponent's progress in fulfillment of this T&C will be provided annually in the Proponent's annual report to the NIRB.

## Project Certificate Condition No. 36

Category	Mine Closure and Reclamation Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To maintain an up to date revegetation plan for the Project.
Term or Condition (TC)	The Proponent shall include revegetation strategies within its Mine Closure and Reclamation Plan that support progressive reclamation, and promote natural revegetation and recovery of disturbed areas compatible with the surrounding natural environment. These strategies should include exploration of the feasibility and practicality of topsoil/organic matter salvage through Project development. The Closure and Reclamation Plan should be updated on an on-going basis as more information becomes available from similar reclamation efforts at other northern projects, as applicable.
Reporting Requirement	Within 3 (three) years from the commencement of construction, information regarding the revegetation strategies developed and implemented by the Proponent in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board. Subsequently, information regarding the Proponent's progress in fulfillment of this Term and Condition shall be provided annually in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	None
Reference	Incorporated within the Interim Closure and Reclamation Plan (ICRP; October 2017).

## Methods:

Potential revegetation of areas that are no longer required for operations, including active revegetation, seeding, and soil amendment will be reviewed by Sabina. Given the cold climate setting of the Project, and precedent established by other Nunavut mine closures, grading and contouring will also be reviewed to control soil stability and to promote revegetation by natural colonization. Sabina has and will continue to include possible revegetation strategies within its Closure and Reclamation Plan (October 2017).

## Results:

Not applicable

## Trends:

Not applicable

## Next Steps:

Within three years from the commencement of Construction, information regarding the revegetation strategies developed and implemented by Sabina in fulfillment of this T&C will be included in Sabina's annual report to the NIRB. Subsequently, information regarding the Proponent's progress in fulfillment of this T&C will be provided annually in the Proponent's annual report to the NIRB.



## 4.5.10 Terrestrial Wildlife and Wildlife Habitat (PC TCs 37 through 52)

## Project Certificate Condition No. 37

Category	Wildlife Mitigation and Monitoring Plan
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate, monitor, and adaptively manage potential impacts to wildlife.
Term or Condition (TC)	<p>The Proponent shall have in place a Wildlife Mitigation and Monitoring Program Plan (WMMPP) throughout all phases of the Project. The plan shall include detailed monitoring, mitigation, and adaptive management measures for wildlife, and shall detail considerations for: species-specific sensitive wildlife periods and areas; activities known to affect wildlife; specific triggers for mitigation and adaptive management intervention; and implementation of all commitments made throughout the Nunavut Impact Review Board's (NIRB) assessment of the Project. The Proponent shall demonstrate appropriate refinements to the WMMPP's design throughout the life of the Project, as necessary to allow for the identification of long-term trends and cumulative effects where project interactions with wildlife are identified. Updates to the WMMPP may be triggered by significant changes in project development plans, monitoring results indicating biologically-meaningful changes, significant updates to the scientific understanding of management methods relevant to wildlife at the project site, Inuit Qaujimagajatuqangit, Traditional Knowledge, changes in climatic conditions that might subject wildlife to unexpected impacts, or as otherwise necessary.</p> <p>Commentary: Measures included in the WMMPP shall be inclusive of all commitments made by the Proponent throughout the Review of the Project. Further, the Proponent shall, throughout the duration of the Project, collaborate with the Kitikmeot Inuit Association, the Government of Nunavut, and other relevant parties to develop updated mitigation, monitoring, and adaptive management measures within the Wildlife Mitigation and Monitoring Program Plan.</p>
Reporting Requirement	The plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 90 days prior to the start of construction, with revised versions submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

## Methods:

Sabina updated the WMMPP in 2018 to include the commitments made at the 2017 Final Hearing. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and Government of Nunavut Department of Environment (GN DOE) in August, 2018. Sabina then met with the KIA and GNDOE in September 2018 to discuss the updates.

The WMMPP was again updated in October 2019 to Version 10. Updates were made to address a commitment to the KIA to include information on spill response equipment contact information for community organizations. The updated WMMPP was provided to the Caribou Technical Advisory Group (CTAG), which includes the KIA and GN during November 2019 and discussed at the December 2019 CTAG meeting.

Results:

Sabina was using the WMMPP (Version 9, 2018) during 2019. Mitigation and monitoring were effective.

Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 38

Category	Wildlife Monitoring
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Inuit Association, the Government of Nunavut
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To monitor wildlife in collaboration with other monitoring bodies.
Term or Condition (TC)	In consultation with the Government of Nunavut, the Kitikmeot Inuit Association, and other relevant parties, the Proponent shall make efforts to contribute to existing and planned cumulative effects and regional monitoring programs for caribou, grizzly bear, wolverine and muskox, as appropriate. Relevant details of coordination through data sharing arrangements or agreements should be highlighted.
Reporting Requirement	Information regarding the Proponent's consultation, coordination and other contribution efforts undertaken in fulfillment of this Term and Condition shall be provided in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP Section 7.2.2.7 Collaborative Herd-scale Monitoring  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

## Methods:

Sabina included collaborative herd-scale monitoring for caribou in the WMMPP in Section 7.2.2.7, which includes 1) participation in meetings for the Draft Bathurst Caribou Range Plan, and 2) collaborative monitoring for caribou with the GNDOE and Government of Northwest Territories Department of Environment and Natural Resources (NWT ENR).

## Results:

A representative from Sabina attended meetings for the Draft Bathurst Caribou Range Plan held in Yellowknife and via teleconference on 17 March 2017, 28 June 2017 and 21 January 2018. Sabina met with representatives of the KIA and GNDOE to review the WMMPP and discuss plans for monitoring in 2019.

## Trends:

Not applicable.

## Next Steps:

Sabina is meeting with representatives of the KIA and GNDOE during 2020 as part of the Caribou Technical Advisory Group (CTAG). Sabina will discuss opportunities to collaborate and regional monitoring at that time.

## Project Certificate Condition No. 39

Category	Caribou Mitigation and Adaptive Management Measures
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to caribou throughout the life of the Project.
Term or Condition (TC)	<p>The Proponent shall provide, within its Wildlife Mitigation and Monitoring Program Plan (WMMPP), measures for the staged reduction of project activities should caribou occur in proximity to the project site. The WMMPP will include a detailed description of all project activities, equipment, and components that would be managed during different phases of staged reduction mitigation events, including rapid and planned operational shutdowns should caribou calving or post-calving ranges overlap with the Project. Any planned activity restrictions/cessations should be of sufficient duration to take into account annual variation in the timing and distribution of calving and post-calving caribou interactions with the Project.</p> <p>Commentary: Additional details to be contained within the WMMPP shall include a quantitative description of the noise produced by all activities, equipment, and components that would be managed during the staged reduction events, in addition to an analysis of the zones over which continuous and instantaneous noise thresholds for caribou would be exceeded within the project area. The Proponent shall provide updated details throughout the life of the Project should activities, equipment, or components alter the zones of influence as originally assessed.</p>
Reporting Requirement	The finalized Wildlife Mitigation and Monitoring Program Plan (WMMPP) shall be submitted to the Nunavut Impact Review Board at least 90 days prior to construction. Subsequently, the Proponent shall provide include an annual summary of the measures taken and monitoring results under the WMMPP in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	<p>WMMPP 7.1.5.2 Levels of Management for Caribou during Normal Operations WMMPP Section 7.1.5.3 Management for Shifts in Calving Ranges</p> <p>Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 109), October 2019.</p>

## Methods:

Section 7.1.5.2 of the WMMP (Levels of Management for Caribou during Normal Operations) describes the triggers and activities for staged reductions in Project activities should caribou be observed near the Project site. Section 7.1.5.3 of the WMMPP (Management for Shifts in Calving Ranges) describes the triggers and activities to be undertaken in response to a shift in calving grounds – leading to a rapid or a planned operational shutdown.

Sabina updated the WMMPP in 2018 with the commitments made at the 2017 Final Hearing, including additional details about reductions in project activities and project shutdowns. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and GN DOE in August, 2018. Sabina then met with the KIA and GNDOE in September 2018 to discuss the updates.

The WMMPP was again updated in October 2019 to Version 10. Updates were made to address a commitment to the KIA to include information on spill response equipment contact information for community organizations. The updated WMMPP was provided to the Caribou Technical Advisory Group (CTAG), which includes the KIA and GN during November 2019 and discussed at the December 2019 CTAG meeting.

Results:

During 2019, Sabina followed the mitigation measures listed in the WMMPP (Version 9, September 2018). No Project shutdowns were triggered by the observation of caribou. Caribou were observed near the Winter Ice Road (WIR) on several occasions during April 2019, leading to short-term closure of the WIR.

Records of incidental observations, monitoring, and mitigation measures are reported in the 2019 Pre-Construction Wildlife Effects Monitoring Report.

Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 40

Category	Caribou Monitoring
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Inuit Association, the Government of Nunavut
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure that implementation of adaptive management is not unduly delayed by potential lag times associated with delayed access to collar data.
Term or Condition (TC)	<p>In consultation with the Kitikmeot Inuit Association, the Government of Nunavut, and relevant parties, the Proponent shall ensure that the utilization of satellite collar data as an early detection method for caribou takes into consideration an agreed-upon biological buffer, as well as potential lag times associated with delayed access to collar data, for the development of thresholds for monitoring and adaptive management triggers.</p> <p>Commentary: The term “agreed-upon biological buffer” references the biological buffer agreed to by the relevant parties at the Supplemental Final Hearing, but this buffer may be updated during the life of the Project to reflect any subsequent agreements by the Proponent, the Kitikmeot Inuit Association, the Government of Nunavut, and other relevant parties.</p>
Reporting Requirement	Within 1 (one) year of construction, information regarding the Proponent’s fulfillment of this Term and Condition shall be included in the Proponent’s annual report to the Nunavut Impact Review Board. Subsequently, information regarding the Proponent’s in fulfillment of this Term and Condition shall be included every 2 (two) years in the Proponent’s annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	<p>WMMPP 7.2.1.2 Near Real-time Collar Monitoring</p> <p>Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.</p> <p>Document title: Back River Project Caribou Movement Rates, September 2018.</p>

## Methods:

Sabina updated the WMMPP in 2018 to include the commitments made at the 2017 Final Hearing, including the biological buffer surrounding collar data. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and GN DOE in August, 2018.

Sabina also prepared a memo *Back River Project Caribou Movement Rates, September 2018*, to address Condition 40 which was circulated for review by the KIA and GNDOE.

Sabina then met with the KIA and GNDOE in September 2018 to discuss the updates and movement rate memo.

Results:

Sabina, the KIA and the GNDOE met in September 2018 to discuss caribou movement rates and the updates to the WMMPP (Version 9, September 2018). The parties discussed data availability and calculation of movement rates from collared caribou.

Trends:

Not applicable.

Next Steps:

Sabina is meeting with representatives of the KIA and GNDOE during 2020 as part of the CTAG.

## Project Certificate Condition No. 41

Category	Caribou Mitigation Measures
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to caribou during periods of heightened sensitivity.
Term or Condition (TC)	The Proponent shall demonstrate consideration for the increased potential of caribou presence in the area when planning outdoor construction activities (including site clearing, blasting, and operation of heavy equipment) during the July 26 to August 31 period.
Reporting Requirement	Information regarding the Proponent's fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP 7.1.5.1 Management System to Reduce Disturbance to Caribou WMMPP 7.1.5.2 Levels of Management for Caribou during Normal Operations  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

## Methods:

Section 7.1.5.1 of the WMMPP (Management System to Reduce Disturbance to Caribou) describes the monitoring and management of the Project site, including advising personnel of the heightened chance of encountering caribou during the summer months. Section 7.1.5.2 (Levels of Management for Caribou during Normal Operations) includes activities to be conducted during the summer months when there is a higher chance of observing caribou.

Sabina updated the WMMPP in 2018 to include the commitments made at the 2017 Final Hearing, including consideration for caribou presence in summer. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and GN DOE in August, 2018.

The WMMPP was again updated in October 2019 to Version 10. Updates were made to address a commitment to the KIA to include information on spill response equipment contact information for community organizations. The updated WMMPP was provided to the Caribou Technical Advisory Group (CTAG), which includes the KIA and GN during November 2019 and discussed at the December 2019 CTAG meeting.

## Results:

Sabina followed the mitigation measures listed in the WMMPP (Version 9, September 2018).

## Trends:

Not applicable.



Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 42

Category	Caribou Mitigation Measures
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure that mitigation measures apply for all caribou.
Term or Condition (TC)	The Proponent shall ensure that all caribou mitigation and monitoring measures (including mitigation for shifts in calving and post-calving ranges) included within the Wildlife Mitigation Monitoring Program Plan apply to all caribou, regardless of the herd.
Reporting Requirement	Information regarding the Proponent's fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP 7.1.5.1 Management System to Reduce Disturbance to Caribou WMMPP 7.1.5.2 Levels of Management for Caribou during Normal Operations WMMPP Section 7.1.5.3 Management for Shifts in Calving Ranges  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 9), September 2018.

## Methods:

Sabina updated the WMMPP in 2018 to include the commitments made at the 2017 Final Hearing including mitigation for all caribou, regardless of herd. Sections of the WMMPP that deal with mitigation and monitoring of caribou includes all caribou, not only the Bathurst herd, principally Sections 7.1.5.1, 7.1.5.2, and 7.1.5.3. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and GN DOE in August, 2018.

The WMMPP was again updated in October 2019 to Version 10. Updates were made to address a commitment to the KIA to include information on spill response equipment contact information for community organizations. The updated WMMPP was provided to the Caribou Technical Advisory Group (CTAG), which includes the KIA and GN during November 2019 and discussed at the December 2019 CTAG meeting.

## Results:

Sabina followed the mitigation measures listed in the WMMPP (Version 9, September 2018) during 2019.

## Trends:

Not applicable.

## Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

### Project Certificate Condition No. 43

Category	Wildlife Mitigation Measures
Responsible Parties	Sabina Gold & Silver Corp., Government of Nunavut
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure that specific criteria and procedures are developed should wildlife be deemed project-tolerant.
Term or Condition (TC)	In consultation with the Government of Nunavut (GN) and other relevant authorities, the Proponent shall include criteria and procedures within its Wildlife Mitigation and Monitoring Program Plan governing the deterring of wildlife from blast zones and the relaxation of mitigation measures for animals deemed project-tolerant. Caribou shall be deterred using only agreed-upon deterrence measures established in consultation with the GN and only if their safety is deemed at risk.
Reporting Requirement	The information should be submitted to the Nunavut Impact Review Board (NIRB) at least 90 days prior to the start of construction, further reporting to be determined following approval of the Project by the Minister.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP Section 7.1.7 Mitigation and Management for Direct Mortality and Injury of Caribou  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.  Document title: Back River Project Wildlife Deterrence, September 2018.

#### Methods:

Sabina updated the WMMPP in 2018 to include the commitments made at the 2017 Final Hearing including deterrence of wildlife. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and GN DOE in August, 2018. Sabina also prepared a memo *Back River Project Wildlife Deterrence, September 2018*, to address Condition 43 which was circulated for review by the KIA and GNDOE. Sabina then met with the KIA and GNDOE in September 2018 to discuss the updates and movement rate memo.

The WMMPP was again updated in October 2019 to Version 10. Updates were made to address a commitment to the KIA to include information on spill response equipment contact information for community organizations. The updated WMMPP was provided to the Caribou Technical Advisory Group (CTAG), which includes the KIA and GN during November 2019 and discussed at the December 2019 CTAG meeting.

#### Results:

Sabina, the KIA and the GNDOE met in September 2018 to discuss caribou deterrence and the updates to the WMMPP (Version 9, September 2018). The parties discussed conditions for deterring caribou. Sabina met with the KIA and GNDOE in December 2019, and there were no further comments on the conditions for deterring caribou.

Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 44

Category	Muskox Mitigation Measures
Responsible Parties	Sabina Gold & Silver Corp., Government of Nunavut
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to muskox from project activities.
Term or Condition (TC)	In collaboration with the Government of Nunavut, the Proponent shall specify within its Wildlife Mitigation and Monitoring Plan specific mitigation measures, trigger distances, and group size thresholds for the protection of muskox in proximity to project activities (e.g., blasting, heavy truck traffic, and aircraft).
Reporting Requirement	Information regarding the Proponent's fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP Section 8.1.3 Mitigation and Management for Disturbance of Muskox  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 9), September 2018.

## Methods:

Sabina updated the WMMPP in 2018 to include the commitments about muskox made at the 2017 Final Hearing. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and GNDOE in August, 2018. Sabina then met with the KIA and GNDOE in September 2018 to discuss the updates.

The WMMPP was again updated in October 2019 to Version 10. Updates were made to address a commitment to the KIA to include information on spill response equipment contact information for community organizations. The updated WMMPP was provided to the Caribou Technical Advisory Group (CTAG), which includes the KIA and GN during November 2019 and discussed at the December 2019 CTAG meeting.

## Results:

Sabina, the KIA and the GNDOE met in September 2018 and December 2019 to discuss the updates to the WMMPP.

## Trends:

Not applicable.

## Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 45

Category	Wildlife Mitigation Measures
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential disturbances to wildlife migration and movement from project infrastructure.
Term or Condition (TC)	The Proponent shall ensure that safety barriers, berms, and designed crossings associated with project infrastructure, including site roads and the winter ice road, are constructed as necessary to allow for the safe passage of caribou and other terrestrial wildlife and do not interfere with wildlife denning sites.
Reporting Requirement	Information regarding the Proponent's fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	<p>Movement across the winter ice road is described in WMMPP Section 7.1.6 Mitigation and Management for Disruption of Movement of Caribou</p> <p>Management for dens in the ice road route is described in WMMPP Section 9.1.3.7 Winter Ice Road Management</p> <p>Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 9), September 2018.</p>

## Methods:

Sabina updated the WMMPP in 2018 to include the commitments about road crossings and denning grizzly bears made at the 2017 Final Hearing. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and GNDOE in August, 2018. Sabina then met with the KIA and GNDOE in September 2018 to discuss the updates.

The WMMPP was again updated in October 2019 to Version 10. Updates were made to address a commitment to the KIA to include information on spill response equipment contact information for community organizations. The updated WMMPP was provided to the Caribou Technical Advisory Group (CTAG), which includes the KIA and GN during November 2019 and discussed at the December 2019 CTAG meeting.

## Results:

Sabina, the KIA and the GNDOE met in September 2018 to discuss the updates to the WMMPP (Version 9, September 2018).

Sabina followed the mitigation hierarchy (avoid, mitigate, manage) to avoid potential den sites. During the fall of 2018, Sabina made adjustments to the route of the winter ice road (WIR) to avoid potential grizzly bear denning habitat identified from Terrestrial Ecosystem Mapping. However, not all potential denning sites could be avoided and the WIR crossed the toe of a small number of esker systems. Prior to construction, during February, 2019, Sabina surveyed these sites to determine their suitability as denning habitat, and using a thermal camera for potential dens. The sites were not determined to be good quality denning habitat and no dens were discovered.

Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 46

Category	Wildlife Monitoring and Adaptive Management Measures
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure that all direct mortalities are reported and considered in the development of adaptive management protocols.
Term or Condition (TC)	The Proponent shall file an incident report to the local wildlife conservation office for any and all direct wildlife mortalities that occur in association with the Project. All incident reports should include sufficient detail to demonstrate how monitoring and mitigation measures failed to prevent the mortality, as well as information pertaining to what measures would be put in place to prevent the incident from reoccurring. The Proponent shall reach an agreement with the appropriate Designated Inuit Organization regarding compensation for any direct mortality of wildlife resulting from the Project.
Reporting Requirement	A summary regarding incidents reported and if compensation was or will be provided by the Proponent for direct mortalities, as well as a description of steps taken in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

## Methods:

Sabina updated the WMMPP in 2018 to include the commitments made at the 2017 Final Hearing including information about responding to wildlife mortalities. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and GNDOE in August, 2018. Sabina then met with the KIA and GNDOE in September 2018 to discuss the updates.

The WMMPP was again updated in October 2019 to Version 10. Updates were made to address a commitment to the KIA to include information on spill response equipment contact information for community organizations. The updated WMMPP was provided to the Caribou Technical Advisory Group (CTAG), which includes the KIA and GN during November 2019 and discussed at the December 2019 CTAG meeting.

## Results:

One wildlife mortality was reported due to Project activities in 2019 - a grizzly bear. All communication with the KIA and GN authorities followed the guidance in the WMMPP (Version 9). Results of wildlife monitoring are reported in the 2019 Pre-Construction Wildlife Effects Monitoring Report.

## Trends:

Not applicable.



Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2020) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 47

Category	Wildlife Monitoring and Adaptive Management Measures
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Inuit Association
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to wildlife through interaction with water attenuation ponds and/or tailings storage areas.
Term or Condition (TC)	The Proponent shall, in consultation with the Kitikmeot Inuit Association, develop and implement measures to prevent the use of water attenuation ponds and tailings storage areas by wildlife, including waterfowl, other migratory birds, and caribou, with sufficient monitoring to assess whether these measures are effective or whether further deterrents may be required.
Reporting Requirement	Information regarding development, implementation and monitoring of the measures developed by the Proponent in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP Section 9.1.7 Mitigation and Management for Attraction of Grizzly Bear and Wolverine  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

## Methods:

Not Applicable. No water attenuation ponds or tailing storage areas occur at the project site at this time. Sections 7.1.10 and 11.1.8 of the WMMPP describe the monitor water quality in project ponds and the Tailings Storage Facilities and mitigation to exclude caribou, other large mammals, and waterbirds if required.

## Results:

Not Applicable. No water attenuation ponds or tailing storage facilities occur at the project site at this time.

## Trends:

Not applicable.

## Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2020) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 48

Category	Wildlife Mitigation Measures
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to wildlife from attraction to project infrastructure.
Term or Condition (TC)	The Proponent shall develop and implement mitigation measures and monitoring programs to limit the attraction of predators and scavengers to Project facilities, and to limit impacts from specific project activities.
Reporting Requirement	Information regarding mitigation measures implemented and/or updated by the Proponent in fulfillment of this Term and Condition shall be included in Wildlife Mitigation and Monitoring Program Plan (WMMPP) and in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP Section 9.1.7 Mitigation and Management for Attraction of Grizzly Bear and Wolverine  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

## Methods:

Sabina updated the WMMPP in 2018 to include the commitments made at the 2017 Final Hearing including limiting the attraction of predators and scavengers. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and GNDOE in August, 2018. Sabina then met with the KIA and GNDOE in September 2018 to discuss the updates.

The WMMPP was again updated in October 2019 to Version 10. Updates were made to address a commitment to the KIA to include information on spill response equipment contact information for community organizations. The updated WMMPP was provided to the Caribou Technical Advisory Group (CTAG), which includes the KIA and GN during November 2019 and discussed at the December 2019 CTAG meeting.

## Results:

The WMMPP, Section 9.1.7 (Mitigation and Management for Attraction of Grizzly Bear and Wolverine), includes sections describing design of buildings to exclude wildlife (Section 9.1.7.1), management of wildlife attractants (Section 9.1.7.2), general mitigation to prevent human-wildlife interactions (Section 9.1.7.3), a protocol for responding to observations of predators and scavengers (Section 9.1.7.4) and a protocol for management of problem wildlife specific to predators (Section 9.1.7.5).

## Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

### Project Certificate Condition No. 49

Category	Annual Reporting to the Nunavut Impact Review Board
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To provide annual updates to the Nunavut Impact Review Board and relevant parties for ongoing monitoring and collaboration purposes
Term or Condition (TC)	<p>The Proponent shall report to the Nunavut Impact Review Board (NIRB) regarding its terrestrial wildlife monitoring efforts, with inclusion of the following information:</p> <ul style="list-style-type: none"> <li>a. Description of all updates to terrestrial wildlife baseline data;</li> <li>b. A description of the involvement of local communities in its monitoring programs;</li> <li>c. A detailed presentation and analysis of the distribution relative to Project infrastructure and activities for caribou and other terrestrial mammals observed during surveys and incidental sightings; and</li> <li>d. Results of the annual monitoring programs, including methodologies and statistical approaches used to support conclusions drawn.</li> </ul>
Reporting Requirement	Information regarding the Proponent's efforts in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	The 2019 Pre-Construction Wildlife Effects Monitoring Report is appended as Appendix D.

#### Methods:

The majority of formal wildlife monitoring will be beginning in the Construction Phase of the Project. Sabina is developing an initial Pre-Construction Wildlife Effects Monitoring Report to report on the pre-construction activities conducted in 2019.

#### Results:

The 2019 Pre-Construction Wildlife Effects Monitoring Report is provided in Appendix D.

#### Trends:

Not applicable. This is the first year of monitoring.

#### Next Steps:

The 2019 Pre-Construction Wildlife Effects Monitoring Report is provided in Appendix D.

## Project Certificate Condition No. 50

Category	Annual Reporting to the Nunavut Impact Review Board
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To provide annual updates to the Nunavut Impact Review Board and relevant parties to verify the effectiveness of ongoing monitoring and mitigation efforts.
Term or Condition (TC)	<p>Within its annual report to the NIRB, the Proponent shall incorporate a review section which includes:</p> <ul style="list-style-type: none"> <li>a. An examination for trends in the measured natural variability of Valued Ecosystem Components in the region relative to the baseline reporting;</li> <li>b. A detailed analysis of wildlife responses to operations with emphasis on wildlife behaviour, mortalities, and displacements (if any), and responses to project operations;</li> <li>c. A detailed description of staged reduction mitigation events, including operational shutdowns, undertaken throughout the year in response to wildlife in proximity to the Project. Details shall include, but are not limited to: <ul style="list-style-type: none"> <li>i. A description of the aggregation and species of wildlife encountered;</li> <li>ii. Environmental conditions;</li> <li>iii. A description of the sequence of activities ceased as well as the duration of cessation; and</li> <li>iv. The effectiveness of the applied mitigation measures and potential amendments that may be required.</li> </ul> </li> <li>d. A demonstration and description of how the monitoring results contribute to cumulative effects monitoring associated with the Project; and</li> <li>e. Any proposed changes to the monitoring survey methodologies, statistical approaches, or proposed adaptive management stemming from the results of the monitoring program.</li> </ul>
Reporting Requirement	Information regarding the Proponent's efforts in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	The 2019 Pre-Construction Wildlife Effects Monitoring Report is appended as Appendix D.

## Methods:

The majority of formal wildlife monitoring will be beginning in the Construction Phase of the Project. Sabina is developing an initial Pre-Construction Wildlife Effects Monitoring Report to report on the pre-construction activities conducted in 2018.

## Results:

Monitoring in 2019 did not identify any triggers for staged reduction or shutdown of project activities. The 2019 Pre-Construction Wildlife Effects Monitoring Report is provided in Appendix D.

Trends:

Not Applicable. This is the first year of monitoring.

Next Steps:

The 2019 Pre-Construction Wildlife Effects Monitoring Report is provided in Appendix D.

## Project Certificate Condition No. 51

Category	Caribou Technical Advisory Group
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To establish an advisory group to provide technical oversight on the Project's mitigation, monitoring, and adaptive management measures related to caribou.
Term or Condition (TC)	<p>In collaboration with the Kitikmeot Inuit Association, the Government of Nunavut, and other relevant parties, the Proponent shall develop and participate in a Caribou Technical Advisory Group. As part of its function, the group shall seek to:</p> <ul style="list-style-type: none"> <li>- Provide independent advice on study design(s) and analyses for the testing and evaluation of the Project's adaptive management measures for reducing disturbance to caribou;</li> <li>- Undertake appropriate testing of the caribou detection methods, group size thresholds, and distance thresholds employed as recommended by the advisory group;</li> <li>- On the basis of these tests, and any other available evidence, provide analyses and a written evaluation of the caribou protection measures and where appropriate make necessary adjustments to those measures; and</li> <li>- Submit reports to the Nunavut Impact Review Board (NIRB), and other relevant parties, for review.</li> </ul> <p>Commentary: Where possible the Proponent shall include relevant hunters and trappers associations and/or knowledgeable land users in the membership of the group and shall demonstrate its consideration for community input and Inuit Qaujimajatuqangit as part of the group's function. The Proponent acknowledges that it is the responsibility of the Proponent to carry out the studies, analyses, evaluation and reports that may be required. The Proponent also commits to taking advice from the Caribou Technical Advisory Group into consideration when carrying out these tasks.</p>
Reporting Requirement	Information regarding the Proponent's fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	<p>WMMPP Section 3.2 Caribou Technical Advisory Group</p> <p>Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October, 2019.</p>



Methods:

Sabina updated the WMMPP in 2018 to include the commitments made at the 2017 Final Hearing, including the Caribou Technical Advisory Group (CTAG). The function and responsibilities of the CTAG is described in Section 3.2 of the WMMPP. The updated WMMPP (Version 9, September 2018) was circulated for review by the KIA and GN DOE in August, 2018.

The WMMPP was again updated in October 2019 to Version 10. Updates were made to address a commitment to the KIA to include information on spill response equipment contact information for community organizations. The updated WMMPP was provided to the Caribou Technical Advisory Group (CTAG), which includes the KIA and GN during November 2019 and discussed at the December 2019 CTAG meeting.

Sabina also produced a draft Terms of Reference (TOR) for the CTAG and circulated this to KIA and GNDOE in September, 2018 and discussed in September 2018 and December 2019.

Results:

Sabina then met with the KIA and GNDOE in September 2018 and December 2019 to discuss the draft TOR for the CTAG.

Trends:

Not Applicable.

Next Steps:

Sabina is in the process of finalizing the CTAG TOR with the KIA and GNDOE and will provide the TOR to the NIRB when finalized.

## Project Certificate Condition No. 52

Category	Caribou Mitigation
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Inuit Association, the Government of Nunavut, the Government of the Northwest Territories
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure caribou protection in the context of additional exploration
Term or Condition (TC)	<p>The Proponent shall, in collaboration with the Government of Nunavut, the Government of the Northwest Territories, the Kitikmeot Inuit Association and other relevant parties, thoroughly evaluate the potential impacts to caribou from planned mineral exploration within its mineral tenures and outside the approved project development area. The Proponent must demonstrate that the potential for adverse effects to caribou populations can be prevented prior to exploration occurring.</p> <p>Commentary: The application of this term and condition is limited to planned mineral exploration which is based out of, or substantially supported by, infrastructure or operations at the Back River Project sites.</p>
Reporting Requirement	Within 1 (one) year of construction, information regarding the Proponent's fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board. Subsequently, information regarding the Proponent's in fulfillment of this Term and Condition shall be included every 2 (two) years in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Not Applicable.
Reference	Not Applicable.

## Methods:

The Project is in the Pre-Construction Phase. The report specified in the condition is due within one year of construction of the Project. Therefore, this condition is not applicable at this time.

## Results:

Not Applicable.

## Trends:

Not Applicable.

## Next Steps:

Within one year of Construction, information regarding Sabina's fulfillment of this T&C will be included in Sabina's annual report to the NIRB. Subsequently, information regarding Sabina's fulfillment of this T&C will be included every two years in Sabina's annual report to the NIRB.

## 4.5.11 Birds and Bird Habitat (PC TCs 53 through 61)

## Project Certificate Condition No. 53

Category	Mitigation, Monitoring, and Adaptive Management for Birds and Bird Habitat
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To develop and implement appropriate mitigation and monitoring measures for birds and bird habitat.
Term or Condition (TC)	<p>The Proponent shall have in place specific measures for the protection and monitoring of birds and bird habitat within its Wildlife Mitigation and Monitoring Program Plan (WMMPP). Protection measures shall include, but are not limited to:</p> <ul style="list-style-type: none"> <li>- Mitigation and monitoring measures applied at all times throughout project operations to limit impacts to birds and bird habitat from specific project activities and infrastructure;</li> <li>- Mitigation and monitoring measures applied during periods of heightened sensitivity or alternative circumstances;</li> <li>- Adaptive management measures with specific triggers for intervention; and</li> <li>- Protocols for collaboration with relevant parties, and the Project's advisory groups, throughout the Project, including on-going consideration and incorporation of Inuit Qaujimaningit, to ensure the effective delivery of the WMMPP as related to bird and bird habitat protection.</li> </ul>
Reporting Requirement	Information regarding mitigation, adaptive management and monitoring strategies and protocols implemented and/or updated by the Proponent in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

## Methods:

Specific measures for the protection and monitoring of birds and bird habitat are described within the Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019, in Sections 10, 11, 12, and 13. During Pre-construction in 2019, incidental observations of birds and nests were recorded.

## Results:

Sabina was using the WMMPP (Version 9, September 2018) during winter, spring and summer of 2019.

Mitigation and monitoring were effective. No bird incidents were reported due to Project activities in 2019. Results will be presented in a "Pre-Construction Wildlife Monitoring Report".

## Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

### Project Certificate Condition No. 54

Category	Mitigation Measures for Birds and Species at Risk
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to Species at Risk.
Term or Condition (TC)	If Species at Risk or their nests and eggs are encountered during project activities or monitoring programs, the primary mitigation measure must be avoidance. The Proponent shall establish clear zones of avoidance for nest of birds, particularly for Species At Risk, based on species-specific nest setback distances outlined in the Wildlife Mitigation and Monitoring Program Plan.
Reporting Requirement	Information regarding the Proponent's fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

#### Methods:

Specific measures for the protection and monitoring of birds and bird habitat are described in the WMMPP (Version 10, October 2019), in Sections 10 through 13. During Pre-construction in 2019, incidental observations of birds and nests were recorded.

#### Results:

Sabina was using the WMMPP (Version 9, September 2018) during winter, spring and summer of 2019. Beginning in November, 2019, Sabina used the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase.

Mitigation and monitoring were effective. No wildlife incidents were reported due to Project activities in 2019. Results will be presented in a "Pre-Construction Wildlife Monitoring Report".

#### Trends:

Not applicable.

#### Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 55

Category	Mitigation and Monitoring Measures for Species at Risk
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate and monitor potential impacts to Species at Risk.
Term or Condition (TC)	The Proponent shall ensure that the mitigation and monitoring strategies developed for Species at Risk are updated as necessary to maintain consistency with any applicable status reports, recovery strategies, action plans, and management plans that may become available through the duration of the Project.
Reporting Requirement	Information regarding mitigation and monitoring strategies implemented and/or updated by the Proponent in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP Section 4.1 Species at Risk  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

## Methods:

During 2019, the WMMPP was updated to Version 10 to include commitments made by Sabina in response to comments and suggestions made by the Kitikmeot Inuit Association (KIA). The WMMPP (Version 10, October 2019) includes a section that describes the species at risk that may occur in the Project area, their status and the mitigation and management for each species at risk (Section 4.1).

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase and ensure that the mitigation and monitoring strategies developed for Species at Risk are updated as necessary, as described in Section 4.1 of the WMMPP. No changes to the WMMPP are anticipated during 2020.

### Project Certificate Condition No. 56

Category	Bird Mitigation Measures
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to birds from construction and clearing activities.
Term or Condition (TC)	<p>The Proponent shall, to the extent possible, schedule required ground-disturbance activities (e.g. clearing) to occur prior to the seasonal return of migratory birds to the project area and shall install nesting deterrents (e.g. flagging) to discourage birds from nesting in areas likely to be disturbed by construction/clearing activities. If clearing is to occur during the nesting season, a nest survey should take place to identify nests and establish appropriate setbacks to ensure nests remain undisturbed until the young have fledged or left the nest. Pre-clearing nest surveys should be conducted less than 14 days prior to land clearing activities as a consideration for the short nesting cycles of some arctic-nesting birds.</p> <p>Commentary: It is noted that the Proponent is not limited to the use of flagging as a nesting deterrent, with flagging having been provided as an example ONLY. It is also highlighted that the reference to “nest surveys” means non-intrusive nest surveys only</p>
Reporting Requirement	Throughout construction, information regarding scheduling issues and/or results of surveys conducted by the Proponent in fulfillment of this Term and Condition shall be included in the Proponent’s annual report to the Nunavut Impact Review Board. After construction, whenever clearing activities are undertaken that could lead to migratory bird nest disturbance or deterrence from migratory bird nests, information regarding scheduling issues, and/or surveys conducted by the Proponent in fulfillment of this Term and Condition shall be included in the Proponent’s annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	<p>WMMPP Section 11.1.3 11.1.3 Mitigation and Management for Disturbance of Waterbirds</p> <p>Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.</p>

#### Methods:

During 2019, the WMMPP was updated to Version 10 to include commitments made by Sabina in response to comments and suggestions made by the Kitikmeot Inuit Association (KIA). The WMMPP (Version 10, October 2019) includes management to schedule ground disturbance activities outside of the nesting season and management measures should a nest be found (Section 11.1.3).

#### Results:

No clearing activities occurred during the nesting season in 2019; therefore, no pre-clearing surveys were conducted.

Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.



### Project Certificate Condition No. 57

Category	Raptor Mitigation Measures
Responsible Parties	Sabina Gold & Silver Corp., Government of Nunavut - Department of Environment
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to raptors from project operations.
Term or Condition (TC)	Prior to removal or deterrence of raptors, the Proponent will contact the Government of Nunavut - Department of Environment to discuss proposed mitigation options and, if required, will obtain the required permits prior to undertaking any activity that can lead to the destruction of raptor nests or the deterring of raptors from nesting sites.
Reporting Requirement	Throughout construction, information regarding mitigation measures implemented by the Proponent in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board. After construction, whenever clearing activities are undertaken that could lead to destruction of raptor nests or raptor deterrence from nests, information regarding mitigation measures implemented by the Proponent in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP Section 10.1.3 Mitigation and Management for Disturbance of Raptors  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

#### Methods:

During 2019, the WMMPP was updated to Version 10 to include commitments made by Sabina in response to comments and suggestions made by the Kitikmeot Inuit Association (KIA). The WMMPP (Version 10, October 2019) includes management to contact the GNDOE prior to discuss proposed mitigation options and, if required, will obtain the required permits prior to undertaking any activity that can lead to the destruction of raptor nests or the deterring of raptors from nesting sites (Section 10.1.3).

#### Results:

No deterrence or removal of raptor nests was required during pre-construction in 2019. No raptor nests were observed.

#### Trends:

Not applicable.

#### Next Step:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 58

Category	Seaducks and Waterfowl Mitigation Measures
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to seaducks and waterfowl from shipping activities.
Term or Condition (TC)	The Proponent shall include measures within the Wildlife Mitigation and Monitoring Program Plan to ensure that, subject only to vessel safety requirements, a setback distance of at least 500 metres is maintained from colonies and moulting aggregations of seaducks and waterfowl during Project shipping transiting through Bathurst/Elu Inlet, Lambert Channel, and Eastern Lancaster Sound.
Reporting Requirement	Information regarding measures implemented shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.  Document title: Back River Project Standard Operating Procedure: Marine Shipping Wildlife Mitigation and Monitoring. September 2019. This document is attached in Appendix E.

## Methods:

Specific measures to mitigate potential impacts to seaducks and waterfowl from shipping activities are described in the WMMPP (Version 10, October 2019) in Section 13 and in the Marine Shipping SOP.

## Results:

Sabina was using the WMMPP (Version 9, September 2018) during winter, spring and summer of 2019. Beginning in November 2019, Sabina used the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase.

The Marine Shipping Wildlife Mitigation and Monitoring SOP (September 2019) was delivered to the shipping company, who followed the guidance in that document, avoiding marine wildlife and bird sensitive areas. No observations of marine mammals and birds were recorded in 2019.

The marine shipping route in 2019 did not pass by the identified sensitive habitat within the recommended setback distance; therefore, the sensitive areas were not disturbed.

Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction phase. Shipping companies will continue to use the Marine Shipping Wildlife Mitigation and Monitoring SOP (September 2019). No changes to the WMMPP or Marine Shipping SOP are anticipated during 2020.

## Project Certificate Condition No. 59

Category	Bird Mortality Reporting
Responsible Parties	Sabina Gold & Silver Corp., Environment and Climate Change Canada
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To report bird mortalities to appropriate parties.
Term or Condition (TC)	Any incidents of bird mortalities associated with project activities are to be recorded and reported to Environment and Climate Change Canada (Canadian Wildlife Service). The Proponent shall work with the Canadian Wildlife Service to determine appropriate recording and reporting format and timing.
Reporting Requirement	Information regarding these incidents shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.

## Methods:

Should a bird mortality occur, Sabina will alert the ECCC Canadian Wildlife Services to report the mortality.

## Results:

Mitigation and monitoring were effective. No bird mortalities were reported due to Project activities in 2019.

## Trends:

Not applicable.

## Next Steps:

Sabina will report the results of monitoring for birds and any bird mortalities in 2019 in the 2019 Pre-Construction Wildlife Effects Monitoring Report included as Appendix D.

### Project Certificate Condition No. 60

Category	Wildlife Mitigation Measures
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To mitigate potential impacts to wildlife from aircraft operations.
Term or Condition (TC)	<p>Subject to safety requirements, the Proponent shall ensure that project aircraft maintain sufficient cruising altitudes to avoid disturbance to migratory birds. In particular, the Proponent shall maintain appropriate altitudes in proximity to observed concentrations of migratory birds, caribou and muskoxen that may be encountered during aircraft flights to the George property and other exploration areas, as well as during the transfer of employees between project facilities.</p> <p>Commentary: The application of this term and condition is limited to planned mineral exploration which is based out of, or substantially supported by, infrastructure or operations at the Back River Project sites.</p>
Reporting Requirement	Initially, until aviation contracts have been established, the Proponent shall provide details on an annual basis regarding the Proponent's measures taken to fulfill this Term and Condition in the Proponent's annual report to the Nunavut Impact Review Board. Once longer term arrangements with contractors have been established, the Proponent shall provide these details in the Proponent's annual report to the Nunavut Impact Review Board every two (2) years or whenever there is a change or addition to the contractors.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	<p>Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.</p> <p>Document title: Back River Project Standard Operating Procedure: Fixed Wing and Helicopter Operations (July 2018).</p>

#### Methods:

Specific measures to mitigate potential impacts to wildlife from aircraft operations are described in the WMMPP (Version 10, October 2019) and the Fixed Wing and Helicopter Operations SOP (July 2018). During Pre-construction in 2019, checks were completed prior to all aircraft landings.

#### Results:

Sabina was using the WMMPP (Version 9, September 2018) during winter, spring and summer of 2019. Beginning in November 2019, Sabina used the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase.

Mitigation and monitoring were effective. No caribou or other wildlife were observed during checks of the airstrips and surrounding area prior to aircraft take-off and landings. Results will be presented in a "Pre-Construction Wildlife Monitoring Report".

Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 61

Category	Aircraft Monitoring Measures
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure that project aircraft are in compliance with operational procedures, commitments, and regulatory requirements.
Term or Condition (TC)	The Proponent shall ensure that pilots are informed of minimum cruising altitude guidelines and that a daily log or record of flight paths and cruising altitudes for project aircraft is maintained to monitor adherence and to follow up on complaints.
Reporting Requirement	The Proponent shall provide information in the Proponent's annual report to the Nunavut Impact Review Board, and will make specific logs or records available to the Nunavut Impact Review Board upon request.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 9), September 2018.  Document title: Back River Project Standard Operating Procedure: Fixed Wing and Helicopter Operations (July 2018).

## Methods:

Section 7.1.5.6 (Fixed Wing Aircraft Management) and 7.1.5.7 (Helicopter Management) of the WMMPP and the SOP describes the monitoring and management of aircrafts, including minimum cruising altitude guidelines. During 2019, the WMMPP was updated to Version 10 to include commitments made by Sabina in response to comments and suggestions made by the Kitikmeot Inuit Association (KIA).

The Fixed Wing and Helicopter Operations SOP (July 2018) was delivered to fixed wing and helicopter companies working on site.

## Results:

Mitigation and monitoring were effective. No wildlife incidents were recorded.

## Trends:

Not applicable.

## Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## 4.5.12 Marine Environment (PC TC 62)

## Project Certificate Condition No. 62

Category	General
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure potential impacts to the marine environment are identified and appropriately mitigated.
Term or Condition (TC)	The Proponent shall maintain a marine monitoring program at the Marine Laydown Area to enable identification of potential impacts of the Project on the marine environment and to inform adaptive management actions. The monitoring program shall be in line with the proposed monitoring in the Aquatic Effects Monitoring Program, or as required by applicable regulatory authorities. At a minimum, water sampling should include end of pipe and control area samples, collected on a regular basis to confirm salinity levels of the discharge and the receiving environment.
Reporting Requirement	The program plan should be submitted to the Nunavut Impact Review Board (NIRB) at least 60 days prior to the commencement of shipping, with results submitted annually thereafter or as may otherwise be required by the NIRB.
Status of Compliance	Compliant - NIRB Document ID No. 319642
Stakeholder Review	Nunavut Impact Review Board
Reference	Marine Monitoring Plan (May 2018) NIRB PRI:319642 Water Management Plan (October 2017) 2018 Marine Sampling Report (April 2019).

## Methods:

Marine Monitoring Plan filed with NIRB on September 5, 2018. Water Management Plan approved by NWB in accordance with Part B, Item 14.

The MLA desalination plant was briefly started in January of 2019 but the conditions were too cold for successful operation of the plant. Water was instead withdrawn from freshwater nearby lakes as permitted under Water Licence 2AM-BRP1819 during the construction and operation of the Winter Ice Road. The desalination plant was restarted in May of 2019 and Sabina collected a sample of intake water (water drawn directly from Bathurst Inlet representing natural water quality) and discharge (the desalination plant reject water following removal of up to 10% desalinated water) on May 9, 2019. Water samples were collected using the methodology outlined in Sabina's 2018 Marine Sampling Program Report (April 2019). The Results of these samples are provided below.

Baseline marine data collection at the MLA was completed in 2018 and marine environmental effects monitoring in Bathurst Inlet will be initiated with Project Construction.



Results:

Desalination did not impact salinity significantly; discharged water was only 1% more saline than the intake water. This indicates that only a very small portion of the water taken up is being extracted for camp use, and is well within 10% of the background salinity as represented by the uptake water. Complete water quality results are provided in Appendix J along with calculations of percentage change in concentrations between the uptake and discharge samples.

Trends:

Not applicable. Bathurst Inlet baseline sampling will be used to compare to future monitoring results to identify potential impacts of the Project on the marine environment and to inform adaptive management actions. Desalination plant discharge will be used to aid in interpretation of results or future trends.

Next Steps:

Desalination plant intake and discharge sampling will continue in 2020. In addition, in 2020 Sabina anticipates updating the Marine Monitoring plan to reflect 2018/19 monitoring results.

## 4.5.13 Marine Wildlife (PC TCs 63 through 65)

## Project Certificate Condition No. 63

Category	Monitoring
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure protection of seals and seal lairs.
Term or Condition (TC)	The Proponent shall undertake a survey for seals and seal lairs annually prior to construction of the winter airstrip and ice road on Bathurst Inlet, and shall take every precaution to align these components to ensure that seal dens/lairs are not impacted by Project infrastructure or activities.
Reporting Requirement	Survey results shall be provided on an annual basis in the Proponent's annual report to the Nunavut Impact Review Board
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.  Document title: Back River Project Standard Operating Procedure: Seal Lair Monitoring (February 2018).

## Methods:

Specific measures to mitigate potential impacts to seals and seal lairs from construction of the winter airstrip and ice road on Bathurst Inlet are described within the WMMPP (Version 10, October 2019) and the Seal Lair Monitoring SOP (February 2018).

During Pre-construction in 2019, surveys for lairs were not required, as construction on ice was completed prior to February 15, 2019.

## Results:

Sabina was using the WMMPP (Version 8, May 2017) during winter, spring and summer of 2018, referencing the commitments made at the 2017 Final Hearing where relevant for the Pre-construction phase. Beginning in October, 2018, Sabina used the updated WMMPP (Version 9, September 2018) to conduct mitigation and monitoring relevant for the Pre-construction Phase.

Mitigation and monitoring were effective in 2018. On January 31, 2018, no potential lairs were observed during the survey. A pressure crack was observed along the alignment; therefore, the airstrip location was moved 50+ metres and the new location was surveyed. No potential lairs were observed. Results will be presented in the "Pre-Construction Wildlife Monitoring Report".

## Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 64

Category	Monitoring
Responsible Parties	Sabina Gold & Silver Corp., Fisheries and Oceans Canada, and other interested parties
Project Phase(s)	Prior to Project-Shipping
Objective	To ensure protection of marine mammals during Project shipping.
Term or Condition (TC)	The Proponent shall ensure that shipping companies contracted for the Project have in place appropriate ship-based marine mammal monitoring programs and protocols developed through consultation with Fisheries and Oceans Canada, communities, and other interested parties. Consideration should be provided for utilizing, trained observers for full-time marine wildlife monitoring with established data collection and recording protocols.
Reporting Requirement	Initially, until contracts with shippers have been established, the Proponent shall provide details on an annual basis regarding the protocols and measures implemented with contracted shipping companies in fulfillment of this Term and Condition in the Proponent's annual report to the Nunavut Impact Review Board. Once longer term arrangements with shippers have been established, the Proponent shall provide these details in the Proponent's annual report to the Nunavut Impact Review Board every two (2) years or whenever there is a change or addition to the shipping companies retained by the Proponent.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP Sections 14 and 15  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.  Document title: Back River Project Standard Operating Procedure: Marine Shipping Wildlife Mitigation and Monitoring. September 2019. This document is attached in Appendix E.

## Methods:

Specific measures to ensure the protection of marine mammals during project shipping are described in the WMMPP (Version 10, October 2019) in Sections 14 and 15, and the Marine Shipping SOP.

## Results:

Sabina was using the WMMPP (Version 9, September 2018) during winter, spring and summer of 2019. Beginning in November 2019, Sabina used the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase.

Sightings of marine mammals from the vessel were not recorded during the one shipping that occurred in August 2019 aboard the Kelly O.

## Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. No changes to the WMMPP are anticipated during 2020.

## Project Certificate Condition No. 65

Category	Marine Shipping
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure community safety and protection of marine/wildlife habitat.
Term or Condition (TC)	The Proponent shall ensure contracted shipping companies are made aware of and required to avoid sensitive wildlife habitat and species along the shipping route and use appropriate protocols and equipment to reduce the potential for an accidental release of fuel or other deleterious substances into the marine environment. These protocols should also be communicated to local communities
Reporting Requirement	Initially, until contracts with shippers have been established, the Proponent shall provide details on an annual basis regarding the protocols and measures implemented with contracted shipping companies in fulfillment of this Term and Condition in the Proponent's annual report to the Nunavut Impact Review Board. Once longer term arrangements with shippers have been established, the Proponent shall provide these details in the Proponent's annual report to the Nunavut Impact Review Board every two (2) years or whenever there is a change or addition to the shipping companies retained by the Proponent.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association, Government of Nunavut Department of Environment
Reference	WMMPP Sections 14 and 15  Document title: Back River Project Wildlife Mitigation and Monitoring Program Plan (Version 10), October 2019.  Document title: Back River Project Standard Operating Procedure: Marine Shipping Wildlife Mitigation and Monitoring. September 2019. This document is attached in Appendix E.

## Methods:

Specific measures to ensure the protection of marine mammals during project shipping are described in the WMMPP (Version 9, September 2018) in Sections 14 and 15 and Marine Shipping SOP. Companies were supplied with a Standard Operating Procedure which ensures companies are aware of sensitive wildlife habitats and species to avoid.

Version 10 of the WMMPP was updated in response to a request from the KIA to include contact information in case of a spill.

Specific measures regarding protocols and equipment to reduce the potential for an accidental release of fuel or other deleterious substances into the marine environment are described in Section 6.1.3 of the WMMPP (Version 9, September 2018). This section references two documents:

1. The Oil Pollution Management Plan (OPMP) (NIRB PRI: 319643) is a requirement of the *Canada Shipping Act* (2001) and describes the responses to oil spill scenarios at the Marine Laydown Area to minimize environmental damage and ensure worker safety. It provides instructions to guide all personnel in emergency spill response situations, defines the roles and responsibilities of management and responders and outlines the measures taken to prevent spills, the related exercise and evaluation programme, and the mechanism for regular updates to the plan.
2. The Shipboard Oil Pollution Emergency Plan (SOPEP) is a requirement of the International Maritime Organization (IMO) for all ships transporting fuel; it describes the equipment, training and procedures that the ship must have on board in order to manage and address any fuel spills during shipment or unloading to minimize any effects on the environment. Sabina will require that the shipping company providing fuel to the Project will have an approved SOPEP in place prior to shipping any fuel to site.

Results:

Sightings of marine mammals from the vessel were recorded during shipping aboard the Kelly O. vessel in August 2018. Seals, polar bears, bowhead whales, and beluga whales were observed during shipping. Results (sightings and the shipping route) will be presented in the "Pre-Construction Wildlife Monitoring Report".

Appropriate protocols were followed to reduce the potential for an accidental release of fuel or other deleterious substance into the marine environment, as per Section 6.1.3 of the WMMPP (Version 9). No spills occurred during shipping in 2019.

Trends:

Not applicable.

Next Steps:

Sabina will continue to utilize the updated WMMPP (Version 10, October 2019) to conduct mitigation and monitoring relevant for the Pre-construction Phase. Shipping companies will continue to use the Marine Shipping Wildlife Mitigation and Monitoring SOP (September 2019). No changes to the WMMPP are anticipated during 2020.

## 4.6 PERFORMANCE ON SOCIO-ECONOMIC TERMS AND CONDITIONS

### 4.6.1 Economic Development and Opportunities (PC TCs 66 through 70)

#### Project Certificate Condition No. 66

Category	Socio-Economic Monitoring and Kitikmeot Socio-Economic Monitoring Committee
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Socio-Economic Monitoring Committee
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Description of the general monitoring framework to be developed in consultation with the Kitikmeot Socio-Economic Monitoring Committee.
Term or Condition (TC)	The Proponent is strongly encouraged to participate in the work of the Kitikmeot Socio-Economic Monitoring Committee along with other agencies and the communities of the Kitikmeot Region, and to identify areas of mutual interest and priority for inclusion into a collaborative monitoring framework that includes socio-economic priorities related to the Project, communities, and the Kitikmeot Region as a whole.
Reporting Requirement	Information regarding the Proponent's efforts in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board
Status of Compliance	Compliant
Stakeholder Review	KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F. Socio-Economic Monitoring Plan (Sabina 2018a)

#### Methods:

A Project monitoring framework is described in the Socio-Economic Monitoring Plan (i.e., Sabina 2018a) and in Section 1 (Introduction) and Section 2 (Methods) of the Socio-Economic Monitoring Report.

#### Results:

Sabina is actively involved in the KSEMC and regularly participates in its meetings. Most recently, Sabina participated in the KSEMC's April 2019 meeting in Cambridge Bay. Sabina's participation in the KSEMC is summarized in Section 1.2 (Socio-Economic Monitoring Requirements and Guidance) and Appendix A (KSEMC & SEMWG Meeting Minutes) of the Socio-Economic Monitoring Report. Sabina's use of community perspectives and TK in the monitoring program is described in Section 1.3 (Use of Community Perspectives and TK) of the report.

#### Trends:

Not applicable.

#### Next Steps:

A revised Socio-Economic Monitoring Plan was submitted to NIRB in December 2018. Sabina will continue to engage the KSEMC, SEMWG, and community stakeholders on the Project's monitoring program.



## Project Certificate Condition No. 67

Category	Socio-Economic Monitoring
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Inuit Association, Government of Nunavut, Indigenous and Northern Affairs Canada, and Kitikmeot communities
Project Phase(s)	Pre-construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Development and establishment of a Project-specific Back River Socio-Economic Monitoring Committee to oversee the Project-specific monitoring program.
Term or Condition (TC)	The Proponent should work with other socio-economic stakeholders including the Kitikmeot Inuit Association, the Government of Nunavut, Indigenous and Northern Affairs Canada, and communities of the Kitikmeot Region, to establish a Back River Socio-Economic Monitoring Committee for the Project to develop and oversee the Back River Socio-Economic Monitoring Program. The Back River Socio-Economic Monitoring Committee should develop Terms of Reference outlining each member's roles and responsibilities for Project-specific socio-economic monitoring throughout the life of the Project.
Reporting Requirement	The Terms of Reference should be submitted to the Nunavut Impact Review Board within six (6) months of issuance of the Project Certificate.
Status of Compliance	Compliant
Stakeholder Review	SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F. Socio-Economic Monitoring Plan (Sabina 2018a)

## Methods:

A Project monitoring framework is described in the Socio-Economic Monitoring Plan (i.e. Sabina 2018a) and in Section 1 (Introduction) and Section 2 (Methods) of the Socio-Economic Monitoring Report.

## Results:

Sabina is actively involved in the SEMWG and regularly participates in its meetings. Most recently, Sabina met with the SEMWG in Cambridge Bay in April 2019. Sabina's participation in the SEMWG is described in Section 1.2 (Socio-Economic Monitoring Requirements and Guidance) and Appendix A (KSEMC & SEMWG Meeting Minutes) of the Socio-Economic Monitoring Report. A revised TOR for the SEMWG has been developed and was submitted to NIRB in December 2018. This TOR is also included as an appendix to the Socio-Economic Monitoring Plan (i.e., Sabina 2018a). Any updates to the TOR will be provided to NIRB through annual Socio-Economic Monitoring Reports.

## Trends:

Not applicable.

## Next Steps:

A revised Socio-Economic Monitoring Plan, which includes a TOR for the SEMWG, was submitted to NIRB in December 2018. Sabina will continue to engage the KSEMC, SEMWG, and community stakeholders on the Project's monitoring program.

## Project Certificate Condition No. 68

Category	Socio-Economic Monitoring
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Socio-Economic Monitoring Committee, Kitikmeot Inuit Association, Government of Nunavut, Indigenous and Northern Affairs Canada, and Kitikmeot communities
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Development of the Project-specific socio-economic monitoring program and on-going monitoring of Project-related socio-economic effects.
Term or Condition (TC)	<p>The Proponent should develop a Project-specific Back River Socio-Economic Monitoring Program designed to:</p> <ul style="list-style-type: none"> <li>- Monitor for Project-induced effects, including the impacts predicted in the Final Environmental Impact Statement through indicators presented in the Back River Socio-Economic Monitoring Plan;</li> <li>- reflect regional socio-economic concerns identified by the Kitikmeot Socio-Economic Monitoring Committee (KSEMC);</li> <li>- work in collaboration with all other socio-economic stakeholders such as the Kitikmeot Inuit Association, the Government of Nunavut, and Indigenous and Northern Affairs Canada, and the communities of the Kitikmeot Region to develop the program; and</li> <li>- include a process for adaptive management and mitigation to respond if unanticipated impacts are identified.</li> </ul>
Reporting Requirement	Details of the Back River Socio-Economic Monitoring Program should be submitted to the NIRB within one (1) year of issuance of the Project Certificate. The Proponent should produce annual Back River socio-economic monitoring reports throughout the life of the Project that are submitted to the Nunavut Impact Review Board and shared with the wider KSEMC.
Status of Compliance	Compliant
Stakeholder Review	KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F. Socio-Economic Monitoring Plan (Sabina 2018a)

## Methods:

A Project monitoring framework is described in the Socio-Economic Monitoring Plan (i.e., Sabina 2018a), an updated version of which was submitted to NIRB in December 2018. Section 1 (Introduction) and Section 2 (Methods) of the Socio-Economic Monitoring Report also summarize the Project's monitoring framework.

## Results:

Sabina's participation in the KSEMC and SEMWG are summarized in Section 1.2 (Socio-Economic Monitoring Requirements and Guidance) and Appendix A (KSEMC & SEMWG Meeting Minutes) of the Socio-Economic Monitoring Report, while Sabina's use of community perspectives and TK in Project monitoring is described in Section 1.3 (Use of Community Perspectives and TK). Sabina's process for adaptive management and mitigation is described in the Socio-Economic Monitoring Plan and in Section 11.2 (Adaptive Management) of the Socio-Economic Monitoring Report. Monitoring program results will continue to be presented in Sabina's annual Socio-Economic Monitoring Report.

Trends:

Monitoring program results will continue to be presented in Sabina's annual Socio-Economic Monitoring Report.

Next Steps:

A revised Socio-Economic Monitoring Plan was submitted to NIRB in December 2018. Sabina will continue to engage the KSEMC, SEMWG, and community stakeholders on the Project's monitoring program.

## Project Certificate Condition No. 69

Category	Socio-Economic Monitoring and Kitikmeot Socio-Economic Monitoring Committee
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Identify risks and potential effects of temporary mine closures on the Kitikmeot Region.
Term or Condition (TC)	The Proponent should undertake an analysis of the risk of temporary mine closure, giving particular consideration to how communities in the Kitikmeot Region may be affected by temporary closure of the mine, including economic, social, and cultural effects. This analysis is required to be updated as necessary to reflect significant changes to the Project or the socio-economic conditions in the region that may increase the risks and potential effects of temporary mine closures.
Reporting Requirement	This initial results of the Proponent's analysis should be provided to the Nunavut Impact Review Board within nine (9) months of the issuance of the Project Certificate. Any updates to the analyses should be provided to the NIRB as completed by the Proponent.
Status of Compliance	Compliant
Stakeholder Review	SEMWG
Reference	Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects (JPCSL 2018)

## Methods:

Sabina has prepared an analysis of the risk of temporary mine closure which considers how communities in the Kitikmeot Region may be affected by temporary closure of the Project, including socio-economic effects.

## Results:

Sabina provided the report 'Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects' (i.e., JPCSL 2018) to NIRB in September 2018.

## Trends:

Not applicable.

## Next Steps:

This analysis may be updated in the future to reflect significant changes to the Project or socio-economic conditions in the region that may increase the risks and potential effects of temporary mine closures. However, no further updates to this report are considered necessary at this time.

**Project Certificate Condition No. 70**

Category	Socio-Economic Monitoring and Kitikmeot Socio-Economic Monitoring Committee (KSEMC)
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Ensuring that the Proponent's Socio-Economic Management Plan addresses the risks and potential effects of temporary mine closures on the Kitikmeot Region.
Term or Condition (TC)	The Proponent is required to update its Socio-Economic Management Plan to include defined measures to address the risks and mitigate the potential effects of temporary closure.
Reporting Requirement	The required updates to the Socio-Economic Monitoring Program (and the Socio-Economic Management Plan included within the Program) should be provided to the Nunavut Impact Review Board within three (3) months of the completion of the analysis or updates to the analysis of the risk of temporary mine closure in the term and condition noted above. The Proponent shall reference the updates to its Socio-Economic Monitoring Program and associated Management Plan in the annual Back River socio-economic monitoring reports that are submitted to the Nunavut Impact Review Board and shared with the wider KSEMC throughout the life of the Project.
Status of Compliance	Compliant
Stakeholder Review	KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F. Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects (JPCSL 2018) Socio-Economic Monitoring Plan (Sabina 2018a) Community Involvement Plan (Sabina 2018b) Human Resources Plan (Sabina 2018c) Business Development Plan (Sabina 2018d)

**Methods:**

Sabina provided the report 'Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects' (i.e., JPCSL 2018) to NIRB in September 2018.

**Results:**

Sabina provided updated versions of the following management plans to NIRB in December 2018:

- Business Development Plan
- Community Involvement Plan
- Human Resources Plan
- Socio-Economic Monitoring Plan

Mitigation and management measures applicable to temporary closure are included in these plans, including new measures identified in JPCSL (2018).

Trends:

Not applicable.

Next Steps:

The analysis presented in JPCSL (2018) may be updated in future to reflect significant changes to the Project or socio-economic conditions in the region that may increase the risks and potential effects of temporary mine closures. However, no further updates to this report are considered necessary at this time.

## 4.6.2 Employment (PC TCs 71 through 72)

## Project Certificate Condition No. 71

Category	Staff Schedule
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Operations, Temporary Closure/Care and Maintenance
Objective	To produce accurate labour market information regarding available Project employment and skill requirements for the Project to support economic and employment forecasting.
Term or Condition (TC)	To the extent the sharing of such information is consistent with and not limited by any Inuit Impact Benefit Agreement with the Kitikmeot Inuit Association, and in consultation with the Government of Nunavut during preparation, the Proponent should submit detailed staff schedule information, consisting of at least the following items: a. Title of positions required by department and division; b. Quantity of positions available by Project phase and year; c. Transferable skills, both certified and uncertified which may be required for, or gained during, employment within each position; and d. The National Occupational Classification code for each individual position.
Reporting Requirement	The Staff Schedule should be submitted to the Nunavut Impact Review Board at least 60 days prior to pre-construction and construction, six (6) months prior to the commencement of operations, if the Proponent identifies significant deviations from the labour force requirements in the FEIS and FEIS Addendum, or as may be required by the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Not applicable
Reference	Not applicable

## Methods:

Sabina will prepare staff schedule information for the NIRB, as appropriate.

## Results:

The most recent staff schedule information update was provided to NIRB in April 2018 (NIRB PRI: 317306). Sabina anticipates providing additional staff schedule information once a construction decision has been made.

## Trends:

Not applicable.

## Next Steps:

Annual monitoring is not required; this information is submitted separately by Sabina to NIRB as appropriate.

## Project Certificate Condition No. 72

Category	Registration of Trades Workers
Responsible Parties	Sabina Gold & Silver Corp., Government of Nunavut
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure that the Government of Nunavut has accurate information to assist in its role as overseer of the apprenticeship program in Nunavut and in providing access to training initiatives and programs.
Term or Condition (TC)	The Proponent is encouraged to identify and register all trades occupations, journeypersons, and apprentices working with the Project, as well as to provide the Government of Nunavut with information regarding the number of registered apprentices and journeypersons from other jurisdictions employed at the Project.
Reporting Requirement	Information regarding the Proponent's efforts in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	GN
Reference	Not applicable

## Methods:

Sabina anticipates collecting information from employees working on the project regarding trades occupations, journey persons, initiatives and apprenticeships once Construction commences.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

Sabina anticipates collecting information regarding occupations, initiatives, and programs for trades workers on the Back River Project Site once Construction commences. This information may be reported on in Sabina's NIRB annual report once Construction commences.



## 4.6.3 Education and Training (PC TCs 73 through 76)

## Project Certificate Condition No. 73

Category	Training Opportunities
Responsible Parties	Sabina Gold & Silver Corp., Government of Nunavut, Training Organizations
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Ensuring that the local, regional, and territorial training opportunities associated with the Project maximize opportunities for the regional workforce to obtain transferable skills and certifications.
Term or Condition (TC)	The Proponent is encouraged to work with training organizations and/or government departments offering mine-related or other training to ensure that Project-specific training programs can yield additional opportunities for residents and employees to gain meaningful and transferable skills and certifications.
Reporting Requirement	The Proponent should summarize the results of these efforts in the annual Back River socio-economic monitoring reports submitted to the Nunavut Impact Review Board and shared with the wider Kitikmeot Socio-Economic Monitoring Committee throughout the life of the Project.
Status of Compliance	Compliant
Stakeholder Review	KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F.

## Methods:

Sabina has had conversations with some relevant parties and anticipates engaging with all relevant training organizations and/or government departments on this topic once we are closer to a construction decision. This may help yield additional opportunities for residents and employees to gain meaningful and transferable skills and certifications.

## Results:

Sabina continues to engage with various government agencies and stakeholders on the Project's development; however, formal engagement with training organizations/government departments on this topic will only commence once a construction decision is made. Additional work in this area will be described in future Socio-Economic Monitoring Reports. Types of training programs currently offered by Sabina are discussed in Section 7.1.2 (Hours of Training (by Type) Completed) and Section 7.1.3 (Inuit Apprenticeships) of the Socio-Economic Monitoring Report.

## Trends:

Not applicable.

## Next Steps:

Sabina anticipates engaging with relevant training organizations/government departments on this topic once a construction decision is made.

## Project Certificate Condition No. 74

Category	Transferable Skills and Certifications
Responsible Parties	Sabina Gold & Silver Corp., Government of Nunavut, Training Organizations
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Ensuring that the Project maximizes opportunities for the regional workforce to obtain transferable skills and certifications.
Term or Condition (TC)	The Proponent shall develop and maintain an easily referenced listing of formal certificates and licences that may be acquired via on-site training or training during Project employment. The listing shall indicate which of these certifications and licences would be transferable to a similar job site within Nunavut.
Reporting Requirement	The initial listing should be provided to the Nunavut Impact Review Board within six (6) months of the Project Certificate being issued. Updates to the list should be included in the annual Back River socio-economic monitoring reports submitted to the Nunavut Impact Review Board and shared with the wider Kitikmeot Socio-Economic Monitoring Committee throughout the life of the Project.
Status of Compliance	Compliant
Stakeholder Review	KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F.

## Methods:

Sabina will continue to maintain a listing of formal certificates and licences that may be acquired via on-site training or training during Project employment.

## Results:

An initial listing was provided by Sabina to NIRB in November 2018 (NIRB PRI: 320914). Updates to this list will be included in future Socio-Economic Monitoring Reports.

## Trends:

Not applicable.

## Next Steps:

Updates to this list will be included in future Socio-Economic Monitoring Reports.

## Project Certificate Condition No. 75

Category	Educational Opportunities
Responsible Parties	Sabina Gold & Silver Corp., Government of Nunavut, Kitikmeot Socio-Economic Monitoring Committee
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Ensuring that the local, regional and territorial educational opportunities maximize the opportunities for Project employment.
Term or Condition (TC)	The Proponent is encouraged to work with the Back River Socio-Economic Monitoring Committee and with the Kitikmeot Socio-Economic Monitoring Committee (KSEMC) to review and monitor education utilization rate trends for Project employees throughout the Project to identify whether or not the Project's employees are accessing educational opportunities available to them in the Kitikmeot Region and/or any Northwest Territories communities.
Reporting Requirement	The summary of this information should be included in the annual Back River socio-economic monitoring reports submitted to the Nunavut Impact Review Board and shared with the wider KSEMC throughout the life of the Project.
Status of Compliance	Compliant
Stakeholder Review	KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F.

### Methods:

Data on this topic may be sourced from future Inuit Employee Surveys. A draft Inuit Employee Survey was included in Appendix B (Proposed Inuit Employee Survey) of the 2018 Socio-Economic Monitoring Report (JPCSL, 2019; NIRB PRI: 324711), and included questions on this topic.

### Results:

Information on this topic will be provided in future Socio-Economic Monitoring Reports and a placeholder has been provided in Section 7.1.6 (Employee Education) of the report. Future results will also be shared with the SEMWG and KSEMC.

### Trends:

Trends may be reported on once relevant data become available.

### Next Steps:

Sabina welcomes feedback from the KSEMC and SEMWG on the survey. Survey revisions may be made as a result of feedback received. No surveys are expected to be administered until after a Project production decision has been made by Sabina.

## Project Certificate Condition No. 76

Category	Inuktitut/Inuinnaqtun Training
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Monitoring training measures being taken to reduce language barriers to Inuit employment on-site.
Term or Condition (TC)	The Proponent is encouraged to provide the following information regarding any second language courses offered on-site: a. Description of courses offered (to include general outline); b. Timing and frequency of courses offered; c. The number of individuals (and percentage of workforce), including Inuit and non-Inuit, taking part in each course, including completion rates; and d. Any noted outcomes or lessons learned from the courses offered.
Reporting Requirement	A summary of this information should be included in the annual Back River socio-economic monitoring reports submitted to the Nunavut Impact Review Board and shared with the wider KSEMC throughout the life of the Project.
Status of Compliance	Compliant
Stakeholder Review	KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F.

## Methods:

Sabina will consider offering second language courses on-site following a construction decision.

## Results:

No second language courses have been offered by Sabina to-date. Updates on this topic will be provided in future Socio-Economic Monitoring Reports in Section 7.1.2 (Hours of Training (by Type) Completed).

## Trends:

Not applicable.

## Next Steps:

Sabina will consider offering second language courses on-site following a construction decision.

## 4.6.4 Population Demographics (PC TC 77)

## Project Certificate Condition No. 77

Category	Monitoring Demographic Changes
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Socio-Economic Monitoring Committee
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Monitoring demographic changes affecting the Kitikmeot communities and the territory as a whole is important to understand and evaluate the Proponent's predictions with regards to population demographics and whether any trends are identified which may be correlated with the Project.
Term or Condition (TC)	Provided the collection and sharing of such information is consistent with and not limited by any Inuit Impact and Benefit Agreement with the Kitikmeot Inuit Association, the Proponent should provide Project-specific data concerning employee community of residence and number of employees that relocated from the year prior (where available, to and from, for Cambridge Bay, Kugluktuk, Taloyoak, Gjoa Haven, and Kugaaruk). The details of this process will be captured in the terms of reference for the Project specific Back River Socio-Economic Monitoring Committee.
Reporting Requirement	Summaries of this information should be included in the annual Back River socio-economic monitoring reports submitted to the Nunavut Impact Review Board and shared with the wider Kitikmeot Socio-Economic Monitoring Committee throughout the life of the Project.
Status of Compliance	Compliant
Stakeholder Review	KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F.

## Methods:

This topic is addressed in Section 3.1.2 (Number of Employees) and Section 3.1.3 (Employee Relocations) of the Socio-Economic Monitoring Report.

Note, Sabina considers the Socio-Economic Monitoring Plan and/or annual Socio-Economic Monitoring Report to be a more appropriate location for the details of this process to be captured.

## Results:

Data on the number of Project employees and contractors by origin and ethnicity help reveal the composition of the Project's current labour force. In 2019, a total of 310 employees and contractors worked on the Project, 49 (or 15.8%) of which were Inuit (see table below). Most Inuit employees and contractors originated from within the Kitikmeot Region (45), while some originated from outside of Nunavut (4). All non-Inuit employees and contractors originated from outside of Nunavut (261). The table below presents the total number of individuals who worked on the Project in 2019 rather than being a point-in-time count. The employment numbers presented below also reflect the limited and short-term/seasonal nature of pre-construction activities that occurred in 2019.

Number of Back River Project Employees and Contractors by Origin and Ethnicity				
Origin		2019		
		Inuit	Non-Inuit	Total
Nunavut	Cambridge Bay	13	0	13
	Gjoa Haven	6	0	6
	Kugaaruk	0	0	0
	Kugluktuk	24	0	24
	Taloyoak	2	0	2
	Other	0	0	0
Other Canadian Provinces and Territories	Alberta	4	259	263
	British Columbia			
	Manitoba			
	New Brunswick			
	Nfld. and Labrador			
	Northwest Territories			
	Nova Scotia			
	Ontario			
	Prince Edward Island			
	Quebec			
	Saskatchewan			
	Yukon			
International	Other	0	2	2
Unknown	Unknown	0	0	0
Total		49	261	310

Source: Sabina

Data on Project employee relocations are expected to be available after a Project production decision has been made by Sabina and formal construction activities begin. A section on this topic has been included as a placeholder in the Socio-Economic Monitoring Report for future years. Additional analysis will be completed as data become available.

## Trends:

Trends may be reported on once additional data become available.

## Next Steps:

Sabina will continue to monitor this topic and engage the KSEMC and SEMWG on the Project's monitoring program.

## 4.6.5 Traditional Activity and Knowledge (PC TCs 78 through 80)

## Project Certificate Condition No. 78

Category	Incorporation of IQ and TK
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Inuit Association, and Kitikmeot Socio-Economic Monitoring Committee
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure monitoring efforts are informed by and reflect Inuit Qaujimaningit and local community knowledge.
Term or Condition (TC)	The Proponent is strongly encouraged to ensure that the development of all Project monitoring plans and associated reporting and updates are undertaken with active engagement of Kitikmeot communities, land users, and harvesters. The Proponent should work with the Kitikmeot Inuit Association and the Kitikmeot Socio-Economic Monitoring Committee to report on the collection and integration of Inuit Qaujimaningit and Traditional Knowledge through its monitoring programs for the Project.
Reporting Requirement	To the extent the sharing of such information is consistent with, and not limited by, any confidentiality or other agreements with the Kitikmeot Inuit Association, summaries addressing the Proponent's fulfillment of this Term and Condition should be included in the annual Back River socio-economic monitoring reports submitted to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	KIA, KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F.

## Methods:

Sabina has finalized the document *Guidance for Incorporating Community Perspectives and Traditional Knowledge in the Back River Project's Monitoring Programs*. This document is presented in Appendix B of the 2019 Socio-Economic Monitoring Report (JPCSL 2020). Feedback from relevant stakeholders is welcome.

## Results:

Sabina has developed the document *Guidance for Incorporating Community Perspectives and Traditional Knowledge in the Back River Project's Monitoring Programs*. It reviews the document's purpose, relevant definitions, potential sources of community perspectives and TK, and reporting and integration considerations for the Project. Where appropriate, future monitoring and/or NIRB Annual Reports may summarize:

- Relevant community engagement and TK activities undertaken during the previous year.
- How community perspectives and TK informed the design and content of the monitoring program.
- How community perspectives and TK informed the results of the monitoring program (including feedback provided).
- Any noted discrepancies between TK and scientific knowledge.
- Responses to key concerns identified through community engagement and TK.
- How community perspectives and TK informed adaptive management for the Project.

Results:

Monitoring results specific to Project VECs/VSECs are provided through their respective monitoring programs and/or Sabina's Annual Report to NIRB.

Trends:

Not applicable.

Next Steps:

Feedback from relevant stakeholders on the guidance document is welcome. Sabina will begin reporting on its use of community perspectives and TK in future monitoring reports.



### Project Certificate Condition No. 79

Category	Inuit Environmental Advisory Committee
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Inuit Association
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	Establishing and reporting on the Inuit Environmental Advisory Committee as a mechanism to incorporate community input (including Inuit Qaujimaningit and Traditional Knowledge) into monitoring plans, programs, and mitigation measures.
Term or Condition (TC)	The Proponent shall establish an Inuit Environmental Advisory Committee. To the extent the sharing of such information is consistent with and not limited by any Inuit Impact Benefit Agreement with the Kitikmeot Inuit Association, once established, the Proponent shall provide the Nunavut Impact Review Board with the following information about the Committee: a. Number of members and home communities; b. Selection process; c. Description of work to be undertaken; and d. Outcome of any work undertaken.
Reporting Requirement	Information regarding the Proponent's efforts in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	KIA
Reference	Back River Project Inuit Impact Benefit Agreement (IIBA)(2018)

#### Methods:

As per Back River Project IIBA (2018), Schedule 7.1 Section 2, the IIBA Implementation Committee, once formed, will establish an Inuit Environmental Advisory Committee within 120 Days of Sabina making a production decision.

#### Results:

A Production Decision was not made by Sabina in 2019.

#### Trends:

Not applicable.

#### Next Steps:

Sabina will establish an Inuit Environmental Advisory Committee within 120 Days of a production decision. Committee Information will be submitted to NIRB once available.

## Project Certificate Condition No. 80

Category	Wildlife Harvesting
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To assess the potential impacts of winter ice road usage on caribou harvesting.
Term or Condition (TC)	If the results from monitoring reveal extensive public use of the winter ice road, or a trend of increasing use of the winter ice road for harvesting, the Proponent shall conduct a harvest study in nearby communities of wildlife harvested from the areas surrounding the winter ice road.
Reporting Requirement	Information regarding the Proponent's efforts in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F.

## Methods:

Section 10.1.4 (Number of Times Public Use of Project Winter Ice Roads Reported) in the annual Socio-Economic Monitoring Report includes monitoring data on this topic. Results are assessed on an annual basis.

## Results:

2019 was the first year the Project's Winter Ice Road (WIR) became operational (operating from April-May). One instance of public use of the WIR was recorded in 2019. This use was by a non-Inuit expeditioner travelling through the area.

## Trends:

Trends may be reported on once additional data become available.

## Next Steps:

Sabina will continue monitoring and reporting on this topic through the NIRB Annual Report process.

## 4.6.6 Non-Traditional Land Use and Resource Use (PC TC 81)

## Project Certificate Condition No. 81

Category	Non-traditional Activity and Resource Use
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Construction, Operations, and Post-Closure
Objective	To assess and monitor potential Project effects on non-traditional activity and knowledge.
Term or Condition (TC)	The Proponent is encouraged to consult with outfitting and guiding businesses that operate in the regional study area regarding use of the land and marine areas in proximity to Project infrastructure or activities and any noted Project effects, particularly for effects in relation to the experience of the natural environment.
Reporting Requirement	Information regarding the consultations and monitoring undertaken by the Proponent in fulfillment of this Term and Condition should initially be provided within two (2) years of Project construction in the Proponent's annual report to the Nunavut Impact Review Board and any updated information should be provided in the annual report to the Nunavut Impact Review Board every year thereafter.
Status of Compliance	Compliant
Stakeholder Review	Not applicable
Reference	NIRB Annual Report 2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F.

## Methods:

Sabina has finalized its *Outfitting/Guiding Business Consultation Protocol*. This document is presented in Appendix C of the 2019 Socio-Economic Monitoring Report (JPCSL 2020). Feedback from relevant stakeholders is welcome.

## Results:

Per Project Certificate T&C No.81, initial reporting is due within two years of Project construction. Sabina did not commence formal construction activities in 2019. Updates on this topic will be provided in Sabina's Annual Reports to NIRB and/or future Socio-Economic Monitoring Reports. Section 9.1.1 (Number of Formal Grievances/Complaints Filed Pertaining to Non-Traditional Land and Resource Use) of future Socio-Economic Monitoring Reports may contain relevant information.

## Trends:

Not applicable.

## Next Steps:

Feedback from relevant stakeholders on the *Outfitting/Guiding Business Consultation Protocol* document is welcome. Sabina will begin reporting on this topic in future monitoring reports within two years of Project construction.

## 4.6.7 Heritage Resources (PC TC 82)

## Project Certificate Condition No. 82

Category	Assessment of Archaeological and Heritage Resources
Responsible Parties	Sabina Gold & Silver Corp., Government of Nunavut - Department of Culture and Heritage
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To assess and monitor potential project effects to archaeological and heritage resources.
Term or Condition (TC)	In any year in which changes to the project footprint are expected to occur or an archaeological permit will be requested, the Proponent will provide the Government of Nunavut - Department of Culture and Heritage (GN-CH) with a series of maps and tables indicating the current status of all archaeological sites within the Project Development Area. Tables provided should include textual descriptions of map contents, and the Proponent shall consult with the GN-CH to establish the contents of the maps and tables to be submitted within its annual status reports.
Reporting Requirement	To be submitted for each year in which changes to the project footprint are expected to occur or an archaeological permit will be requested. Specific reporting requirements will be as agreed to by the Government of Nunavut - Department of Culture and Heritage.
Status of Compliance	Compliant
Stakeholder Review	The 2019 Archaeology Site Status Report was issued to the Government of Nunavut - Department of Culture and Heritage on February 25, 2020.
Reference	Golder (Golder Associates Ltd.). 2020. Back River Project, Nunavut - 2020 Archaeology Site Status Report. Doc 18114181-056-RPT-Rev0

## Methods:

Sabina's proposed development work was reviewed to determine where previously recorded sites might be impacted and to see what areas might need pre-impact assessment. Where there were previously recorded sites in close proximity (<50m) to project developments, the sites were staked for avoidance with wooden stakes marked by high visibility flagging. Sabina personnel were responsible for monitoring flagged sites during construction to ensure avoidance.

In 2019 construction continued on the Project footprint in the MLA and the WIR route was revised in several places, including staying on Bathurst Inlet all the way to the south end of the inlet. In order to improve the current WIR route, several areas have been proposed for optimization and upgrades.

Pedestrian surveys were undertaken along portions of the winter ice road that are proposed outside of the previous study areas. Any identified heritage sites were recorded and flagged for avoidance. Site forms were completed for both revisited sites and for newly identified sites.

Excel tables and pdf maps are maintained that list the status of all archaeological sites within the affected Projects areas. These tables and maps were updated with new status information on the revisited sites and with the newly identified sites. The tables and maps form the core of the Annual Site Status Report issued to the Government of Nunavut.

Results:

The 2018 archaeological program involved the staking of 12 previously recorded sites for avoidance in the MLA, GPA, and along the WIR. Additional features and/or artifacts were noted at four of these previously recorded sites. Approximately 30 km of WIR reroutes were assessed for heritage resources. Four newly identified sites were recorded and staked for avoidance along the WIR in these portions of the road that had not been previously surveyed. The results were recorded on site forms, tables and in the Annual Sites Status Report as well as the Permit Report for this year's work.

In 2019, under Nunavut Archaeologist Permit 2019-14A, due to expansion of some Project footprints in the MLA, sites MdNI-17 and 18 were revisited and staked for avoidance. This work in the MLA also led to the identification of site MdNI-21, a kayak stand. Sites MdNI-17, 18 and 21 are all located within the proposed expansion of a laydown area and it is recommended that the proposed expansion be altered to avoid these sites. All three sites were staked for avoidance. Previously recorded sites (MbNj-21 and McNj-48, 49 and 50) along the WIR route optimizations were also revisited to check on their status and stake them for avoidance. All of these sites were found to be intact and undisturbed and additional artifacts were observed at MbNj-21 and McNj-48 and 49. While conducting archaeological assessments of proposed route optimizations for the WIR, three new sites were observed. These include two campsites (MbNj-24 and 25) and one hunting blind (MaNj-8). Sites MbNj-24 and 25 are within the proposed WIR route optimization. It is recommended that one of the two alternate routes that were scouted in the field be used in order to avoid these sites. Both sites were staked for avoidance, but if this is not possible then the sites will need to be mitigated. Site MaNj-8 is being avoided by the WIR and no further work is recommended unless the WIR route or proposed optimizations change.

Trends:

No notable trends.

Next Steps:

Sabina will continue to utilize the Back River Project Cultural and Heritage Resources Plan.

## 4.6.8 Health and Wellbeing (PC TCs 83 through 85)

## Project Certificate Condition No. 83

Category	Employee Housing
Responsible Parties	Sabina Gold & Silver Corp., Government of Nunavut, Nunavut Housing Corporation
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To assess and monitor the extent to which the Project enhances employee access to a range of housing options.
Term or Condition (TC)	The Proponent is strongly encouraged to communicate and collaborate with the Government of Nunavut and the Nunavut Housing Corporation on potential housing initiatives with a view to enhancing employee access to a range of housing options, including homeownership. Initiatives may include, but are not limited to, the provision of financial literacy, financial planning, and personal budgeting training.
Reporting Requirement	Provided the sharing of such information is consistent with and not limited by the terms and conditions of any applicable Inuit Impact Benefit Agreement with the Kitikmeot Inuit Association, these efforts should be reported to the Nunavut Impact Review Board within the annual Back River Socio-Economic Monitoring Report.
Status of Compliance	Compliant
Stakeholder Review	Government of Nunavut, Nunavut Housing Corporation
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F. Human Resources Plan (Sabina 2018c)

## Methods:

As described in the Human Resources Plan (Sabina 2018c), Sabina may arrange for financial management orientation for employees (based on demand).

## Results:

No related training programs have been offered by Sabina to-date. However, Sabina anticipates engaging with the GN on this topic in the future. Updates on this topic will be provided in future Socio-Economic Monitoring Reports in Section 7.1.2 (Hours of Training (by Type) Completed). Other housing-related initiatives may also be reported on in future reports.

## Trends:

Not applicable.

## Next Steps:

Sabina anticipates engaging with the GN on this topic following a production decision.

## Project Certificate Condition No. 84

Category	Employee Housing
Responsible Parties	Sabina Gold & Silver Corp., Government of Nunavut, Nunavut Housing Corporation, Kitikmeot Socio-Economic Monitoring Committee
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To assess and monitor the potential for Project-induced effects on regional access to housing.
Term or Condition (TC)	The Proponent is strongly encouraged to work with the Kitikmeot Socio-Economic Monitoring Committee (KSEMC), the Nunavut Housing Corporation, and the GN to design and implement a voluntary housing survey to be offered to its Nunavummiut employees.
Reporting Requirement	<p>The frequency and content of the survey should be determined by the collaborating parties, but content may include changes to address, housing status (i.e., public/social, privately owned/rented, government, etc.) and migration intentions of Project employees.</p> <p>Non-confidential results of the survey should be reported to the GN and other members of the KSEMC and summary information of these results should be reported to the Nunavut Impact Review Board within the annual Back River Socio-Economic Monitoring Report.</p>
Status of Compliance	Compliant
Stakeholder Review	KSEMC, SEMWG
Reference	2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F.

## Methods:

A draft Inuit Employee Survey was included in Appendix B (Proposed Inuit Employee Survey) of the 2018 Socio-Economic Monitoring Report (JPCSL, 2019; NIRB PRI: 324711), which included questions on this topic. Sabina welcomes feedback on the survey from the KSEMC and SEMWG (the GN is a member of both groups).

## Results:

No data on this topic are expected to be available until after a Project production decision has been made by Sabina and formal construction activities begin. Information on this topic will be provided in future Socio-Economic Monitoring Reports, for example if Inuit Employee Survey data becomes available, in Section 8.1.6 (Employee Changes of Address, Housing Status, and Migration Intentions).

## Trends:

Trends may be reported on once relevant data become available.

## Next Steps:

Survey revisions may be made as a result of feedback received. No surveys are expected to be administered until after a Project production decision has been made by Sabina.

## Project Certificate Condition No. 85

Category	Cross-cultural Awareness
Responsible Parties	Sabina Gold & Silver Corp., Kitikmeot Inuit Association
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To support the elimination of cultural barriers and promote recognition for Inuit Qaujimajatuqangit to establish a healthy workplace for all Project employees.
Term or Condition (TC)	<p>The Proponent is encouraged to work with the Kitikmeot Inuit Association to establish cross-cultural training initiatives which promote respect and consideration for the importance of Inuit Qaujimajatuqangit to the Inuit identity and to make this training available to Project employees and on-site sub-contractors. The Proponent should actively monitor the implementation of these initiatives, including the following items:</p> <ul style="list-style-type: none"> <li>a. Descriptions of the goals of each program offered;</li> <li>b. Language of instruction;</li> <li>c. Schedules and location(s) of when each program was offered;</li> <li>d. Uptake by employees and/or family members where relevant, noting Inuit and non-Inuit participation rates; and</li> <li>e. Completion rates for enrolled participants, noting Inuit and non-Inuit participation rates.</li> </ul>
Reporting Requirement	Summaries of all cross-cultural training initiatives should be provided in the annual Back River Socio-Economic Monitoring Report.
Status of Compliance	Compliant
Stakeholder Review	Kitikmeot Inuit Association
Reference	<p>2019 Socio-Economic Monitoring Report (JPCSL 2020). This document is attached in Appendix F.</p> <p>Human Resources Plan (Sabina 2018c)</p>

## Methods:

As described in the Human Resources Plan (Sabina 2018c), Sabina may provide cross-cultural orientation for employees.

## Results:

While cross-cultural training has been offered to select Project staff in the past, a revised training program has not yet been developed with the KIA. Updates on this topic will be provided in Section 7.1.2 (Hours of Training (by Type) Completed) of future Socio-Economic Monitoring Reports.

## Trends:

Not applicable.

## Next Steps:

Sabina anticipates engaging with the KIA on this topic following a Production decision.



## 4.6.9 Human Health and Safety (PC TCs 86 through 88)

## Project Certificate Condition No. 86

Category	Airborne Actinolite Fibres
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure worker health and safety.
Term or Condition (TC)	If potential health risks due to airborne actinolite fibres are identified, the Proponent shall enact measures to mitigate human exposure, notify the Territorial occupational health authority, and update relevant management plans.
Reporting Requirement	If required, updated information regarding mitigation measures/management plans should be provided to the Nunavut Impact Review Board at least 60 days prior to the commencement of construction, and subsequent modifications to these plans should be identified and included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Health Canada, Nunavut Impact Review Board
Reference	FEIS Technical Comment No. F-HC-TC-4

## Methods:

If airborne actinolite fibres are identified, Sabina will enact measures to mitigate human exposure, notify the Territorial occupational health authority, and update relevant management plans.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

Sabina will reconsider this requirement following a production decision.

## Project Certificate Condition No. 87

Category	Site Orientation
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure worker health and safety.
Term or Condition (TC)	The Proponent shall have in place a comprehensive site orientation plan for all employees. Further, the Proponent shall ensure all worker site- orientation, training presentations, and materials are updated regularly and reflect any amendments to management plans
Reporting Requirement	The updated site orientation plan should be provided to the Nunavut Impact Review Board at least 60 days prior to the commencement of construction and subsequent modifications to this plan should be identified and included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board
Reference	Not applicable

## Methods:

Sabina will have in place a comprehensive site orientation plan for all employees. Further, the Proponent shall ensure all worker site- orientation, training presentations, and materials are updated regularly and reflect any amendments to management plans.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

Sabina's site orientation plan will be provided to the NIRB at least 60 days prior to the commencement of Construction and subsequent modifications to this plan will be identified and included in Sabina's annual report to the NIRB.

**Project Certificate Condition No. 88**

Category	Winter Ice Road Operations
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure worker health and safety.
Term or Condition (TC)	The Proponent shall include, within its relevant management plans, consideration for worker safety during winter ice road operations, particularly during periods of adverse weather conditions. The Proponent shall ensure that updates are made to its safety procedures throughout the life of the Project consistent with best management practices for similar ice road projects.
Reporting Requirement	Updated sections of the relevant management plans should be provided to the Nunavut Impact Review Board at least 60 days prior to the commencement of construction and subsequent modifications to these plans should be identified and included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board
Reference	Not applicable

**Methods**

Sabina will include, within its relevant management plans, consideration for worker safety during winter ice road operations, particularly during periods of adverse weather conditions. Sabina will ensure that updates are made to its safety procedures throughout the life of the Project consistent with best management practices for similar ice road projects.

**Results:**

Not applicable.

**Trends:**

Not applicable.

**Next Steps:**

Updated sections of the relevant management plans will be provided to the NIRB at least 60 days prior to the commencement of Construction and subsequent modifications to these plans will be identified and included in the Sabina's annual report to the NIRB.

## 4.7 PERFORMANCE ON OTHER TERMS AND CONDITIONS

### 4.7.1 Accidents and Malfunctions (PC TCs 89 through 94)

#### Project Certificate Condition No. 89

Category	Spills
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-shipping, Construction, Operations, Temporary Closure/Care and Maintenance
Objective	To protect marine wildlife, migratory birds, and the marine environment.
Term or Condition (TC)	<p>The Proponent shall include within its Wildlife Mitigation and Monitoring Program Plan measures for preventing fuel spills into the marine environment and mitigating potential effects of an accidental spill on polar bears, seals, other marine wildlife, and migratory birds. Measures should include:</p> <ul style="list-style-type: none"> <li>a. Placement of spill prevention and response equipment as necessary to initiate wildlife protection measures along shipping routes and on-site;</li> <li>b. Ensuring spill response contacts for Sabina and government agencies are current;</li> <li>c. Providing a list of community organizations that would be contacted to inform traditional land users of shipping activity in the area, any spills and actions to ensure public safety and plans for clean-up.</li> </ul>
Reporting Requirement	The mitigation plan should be provided to the Nunavut Impact Review Board prior to the commencement of Project-related shipping, and updates provided with annual reporting.
Status of Compliance	Compliant
Stakeholder Review	Transport Canada, Government of Nunavut, Nunavut Impact Review Board
Reference	Wildlife Mitigation and Monitoring Program Plan Oil Pollution Emergency Plan (2018), NIRB PRI 319643

#### Methods:

Sabina provided the NIRB with a submission on September 5, 2018 in fulfillment of Project Certificate T&C No.89. In summary,

The WMMPP includes measures for managing fuels and other hazardous materials on land, at the MLA and during marine shipping in Section 6.1.3; Spill Management. The WMMPP describes the five management plans used for fuels, hazardous substances and managing spills and refers the reader to the applicable plan.

For a spill occurring at the MLA, the WMMPP refers the reader to the Oil Pollution Emergency Plan (OPEP). This Plan was provided to the NIRB in fulfillment of Project Certificate T&C No.90 on September 3, 2018.

The OPEP/OPPP includes measures to prevent harm to wildlife should a spill occur at the MLA, including:

1. Measures to prevent spills occurring,
2. Default measures used to reduce the chance of a spill spreading, such as the use of fuel spill booms during fueling,
3. Modeling to predict the direction of spread of small or large spills under known wind and current conditions,
4. A description of environmentally sensitive features (Section 5.3.6) including known locations of marine birds, marine mammals, and marine fish in the area which could be affected by a spill,
5. A response management system should a spill occur (Section 7), and Spill Response Procedures (Section 8), that includes:
  - a. Responsibilities, coordination, reporting, management, treatment and disposal instructions,
  - b. Locations of wildlife habitat where mitigation should be focused,
  - c. Deterrence of wildlife from a spill, and
  - d. Cleaning of any oiled wildlife.

Results:

Not applicable.

Trends:

Not applicable.

Next Steps:

Any updates to the management plans will be provided with annual reporting.

## Project Certificate Condition No. 90

Category	Spills
Responsible Parties	Sabina Gold & Silver Corp., Transport Canada
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure accurate and adequate spill response and emergency preparedness.
Term or Condition (TC)	The Proponent shall maintain an Oil Pollution Emergency Plan (OPEP) with a list of authorised personnel, staff training, and the required Northwest Territories-Nunavut spill report document.
Reporting Requirement	The OPEP should be provided to the Nunavut Impact Review Board prior to the commencement of Project-related shipping, and updates provided with annual reporting.
Status of Compliance	Compliant
Stakeholder Review	Transport Canada
Reference	Oil Pollution Emergency Plan (2018), NIRB PRI 319643

## Methods:

Sabina provided the NIRB with a submission on September 3, 2018 in fulfillment of Project Certificate T&C No.90. An OPEP with a list of authorised personnel, staff training, and the required Northwest Territories-Nunavut spill report document was provided.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

Any updates to the management plans will be provided with annual reporting.

## Project Certificate Condition No. 91

Category	Marine Shipping
Responsible Parties	Sabina Gold & Silver Corp., Transport Canada
Project Phase(s)	Pre-shipping, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure protection of the marine environment.
Term or Condition (TC)	The Proponent shall contract only certified vessels to carry cargo for the Project, and will ensure shippers are aware of the requirements of the Shipping Management Plan, the Risk Management and Emergency Response Plan, and the Oil Pollution Emergency Plan.
Reporting Requirement	Monitoring plans should be provided to the Nunavut Impact Review Board prior to the commencement of Project-related shipping, with any subsequent amendments or new plans being identified and provided in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Transport Canada
Reference	Shipping Management Plan (2018) NIRB PRI: 319686
	Oil Pollution Emergency Plan (2018) NIRB PRI: 319643
	Risk Management and Emergency Response Plan (2018) NIRB PRI: 319645

### Methods:

Sabina provided the NIRB with a submission on September 3, 2018 in fulfillment of Project Certificate T&C No.91. The Back River Project Shipping Management Plan, Risk Management and Emergency Response Plan, and the Oil Pollution Emergency Plan were provided to the NIRB. These plans were also provided to the shippers to ensure they were aware of their respective requirements.

### Results:

Not applicable.

### Trends:

Not applicable.

### Next Steps:

Any subsequent amendments or new plans being identified will be provided in Sabina's annual report to the NIRB.

## Project Certificate Condition No. 92

Category	Marine Shipping
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-shipping, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure protection of the Marine Environment.
Term or Condition (TC)	<p>The Proponent shall ensure that the necessary spill response equipment and training to employees, contractors, and local community members is available prior to commencing Project shipping.</p> <p>Commentary: The reference to “local community members” means members of the public who may reside seasonally in or near the communities of Kingaok (Bathurst Inlet) and Omingmaktok (Bay Chimo).</p>
Reporting Requirement	An inventory of spill equipment and listing of training undertaken shall be provided to the Nunavut Impact Review Board prior to the receipt of the first project-related shipment. Subsequently, results of annual inspections shall be included in the Proponent’s annual report to the Nunavut Impact Review Board.
Status of Compliance	Compliant
Stakeholder Review	Nunavut Impact Review Board
Reference	Oil Pollution Emergency Plan (2018) NIRB PRI: 319643

## Methods:

Sabina provided the NIRB with a submission on September 3, 2018 in fulfillment of Project Certificate T&C No.92. An inventory of spill equipment and listing of training undertaken is detailed in Sections 7.4, 10, and Annex 4 of the Oil Pollution Emergency Plan.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

Any changes to personnel, delivering companies, and the Oil Pollution Prevention Plan/Oil Pollution Emergency Plan (OPPP/OPEP), will be included in subsequent Sabina annual reports to the NIRB.



## Project Certificate Condition No. 93

Category	Navigation Charts
Responsible Parties	Sabina Gold & Silver Corp., Fisheries and Oceans Canada - Canadian Hydrographic Services
Project Phase(s)	Post-construction
Objective	To mitigate potential ship groundings.
Term or Condition (TC)	The Proponent shall submit a post-construction depiction of the Marine Laydown Area and surrounding shoreline, including any new bathymetry aspects.
Reporting Requirement	This information shall be provided to Fisheries and Oceans Canada - Canadian Hydrographic Services following construction and when the information is provided to Fisheries and Oceans Canada the Proponent shall advise the Nunavut Impact Review Board that the required information has been submitted.
Status of Compliance	Compliant
Stakeholder Review	Fisheries and Oceans Canada - Canadian Hydrographic Services, Nunavut Impact Review Board
Reference	Not applicable

## Methods:

Sabina confirms no in-water construction occurred in the marine environment at the Marine Laydown Area in 2019.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

If in-water construction occurs in the marine environment at the Marine Laydown Area, Sabina will provide a post-construction depiction, including any new bathymetry aspects, to DFO - Canadian Hydrographic Services following construction. When the information is provided to DFO, Sabina will advise the NIRB that the required information has been submitted.

## Project Certificate Condition No. 94

Category	Fuel Transportation
Responsible Parties	Sabina Gold & Silver Corp.
Project Phase(s)	Pre-construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure
Objective	To ensure protection of the environment.
Term or Condition (TC)	The Proponent shall ensure fuel trucks meet industry design standards and receive regularly scheduled maintenance of fuel lines, nozzles and dust caps.
Reporting Requirement	A summary of the results of the applicable maintenance schedules and a summary of inspections shall be included in the Proponent's annual report to the Nunavut Impact Review Board.
Status of Compliance	Partially Compliant
Stakeholder Review	Nunavut Impact Review Board
Reference	Not applicable

## Methods:

Sabina ensures all fuel trucks meet industry design standards and receive regularly scheduled maintenance of fuel lines, nozzles, and dust caps. Fuel trucks are not mobilized to the Back River Project without a thorough mechanical investigation, as well as review of the equipment's documentation by the Project's mechanics.

## Results:

Not applicable.

## Trends:

Not applicable.

## Next Steps:

A summary of the results of the applicable maintenance schedules and a summary of inspections shall be included in Sabina's 2020 annual report to the Nunavut Impact Review Board.

## Appendix A. Figures

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Figure 1. Back River Project Overview

Figure 2. Winter Ice Road Corridor Overview

Figure 3. Goose Property Area, Potential Development Area and Layout

Figure 4. Marine Laydown Area, Potential Development Area and Layout

## Appendix B. Expediter Verification Form

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## Appendix C. 2019 Vegetation Monitoring Program

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## Appendix D. 2019 Pre-Construction Wildlife Mitigation and Monitoring Program Report

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## Appendix E. Marine Shipping Wildlife Mitigation and Monitoring

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## Appendix F. Socio-Economic Monitoring Report

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## Appendix G. Rascal Stream West Fish Habitat Assessment

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## Appendix H. Air Quality Monitoring and Management Plan

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## Appendix I. Incinerator Management Plan

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## Appendix J. Marine Water Quality Results

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