

2019 Socio-Economic Monitoring Report for the Back River Project

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Prepared For:
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EXECUTIVE SUMMARY

This is the second annual Socio-Economic Monitoring Report prepared by Sabina Gold & Silver Corp. for the Back River Project. The content of this report is guided by the Project's Socio-Economic Monitoring Plan (i.e. Sabina 2018a). More specifically, Sabina's reports are intended to assess the socio-economic performance of the Project as it progresses from construction through operations and eventual closure. The Project remained in the pre-construction phase in 2019.

Some Project employment, training, and business opportunity information was available for 2019. A total of 310 individuals worked on the Project, completing 145,171 hours of work. Of this, 49 Inuit worked on the Project, completing 21,735 hours of work (or 15.0% of total hours worked). 189 hours of training were also completed, including 84 hours by Inuit (or 44.4% of total). In 2019, a total of \$27.1 million in expenditures were made to 240 businesses. Of this, \$16.4 million (or 60.5%) in expenditures were made to 73 northern businesses (including Kitikmeot Qualified Businesses, NTI Registered Inuit Firms, Nunavut Businesses, and other Northern Businesses). \$5.6 million (or 20.7%) in expenditures were made to 14 Kitikmeot Qualified Businesses.

A Project production decision was not made by Sabina in 2019 and formal construction activities did not begin. The socio-economic data presented in this report may thus be limited or will continue to serve as baseline information until construction commences. Performance conclusions may be drawn as additional monitoring data become available in future years. No need has been identified to update any FEIS predictions or to modify Sabina's existing management approach at this time. However, Sabina will continue to use adaptive management as a tool for improving the Project's overall socio-economic performance in the future.

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ABBREVIATIONS

CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
Company	Sabina Gold & Silver Corp.
EA	Environmental Assessment
EFAP	Employee and Family Assistance Program
FEIS	Final Environmental Impact Statement
FTE	Full-Time Equivalent
GDP	Gross Domestic Product
GN	Government of Nunavut
IEAC	Inuit Environmental Advisory Committee
IIBA	Inuit Impact and Benefit Agreement
IQ	Inuit Qaujimajatuqangit
KIA	Kitikmeot Inuit Association
KQB	Kitikmeot Qualified Businesses
KSEMC	Kitikmeot Socio-Economic Monitoring Committee
LSA	Local Study Area
MLA	Marine Laydown Area
NAC	Nunavut Arctic College
NBS	Nunavut Bureau of Statistics
NHC	Nunavut Housing Corporation
NIRB	Nunavut Impact Review Board
NNI	Nunavummi Nangminiqqtunik Ikajuuti
NTI	Nunavut Tunngavik Incorporated
NuPPAA	Nunavut Planning and Project Assessment Act
Project	Back River Project
RSA	Regional Study Area
Sabina	Sabina Gold & Silver Corp.
SEMWG	Back River Socio-Economic Monitoring Working Group
TOR	Terms of Reference
TK	Traditional Knowledge
VC	Valued Component
VEC	Valued Ecosystem Component
VSEC	Valued Socio-Economic Component
WIR	Winter Ice Road

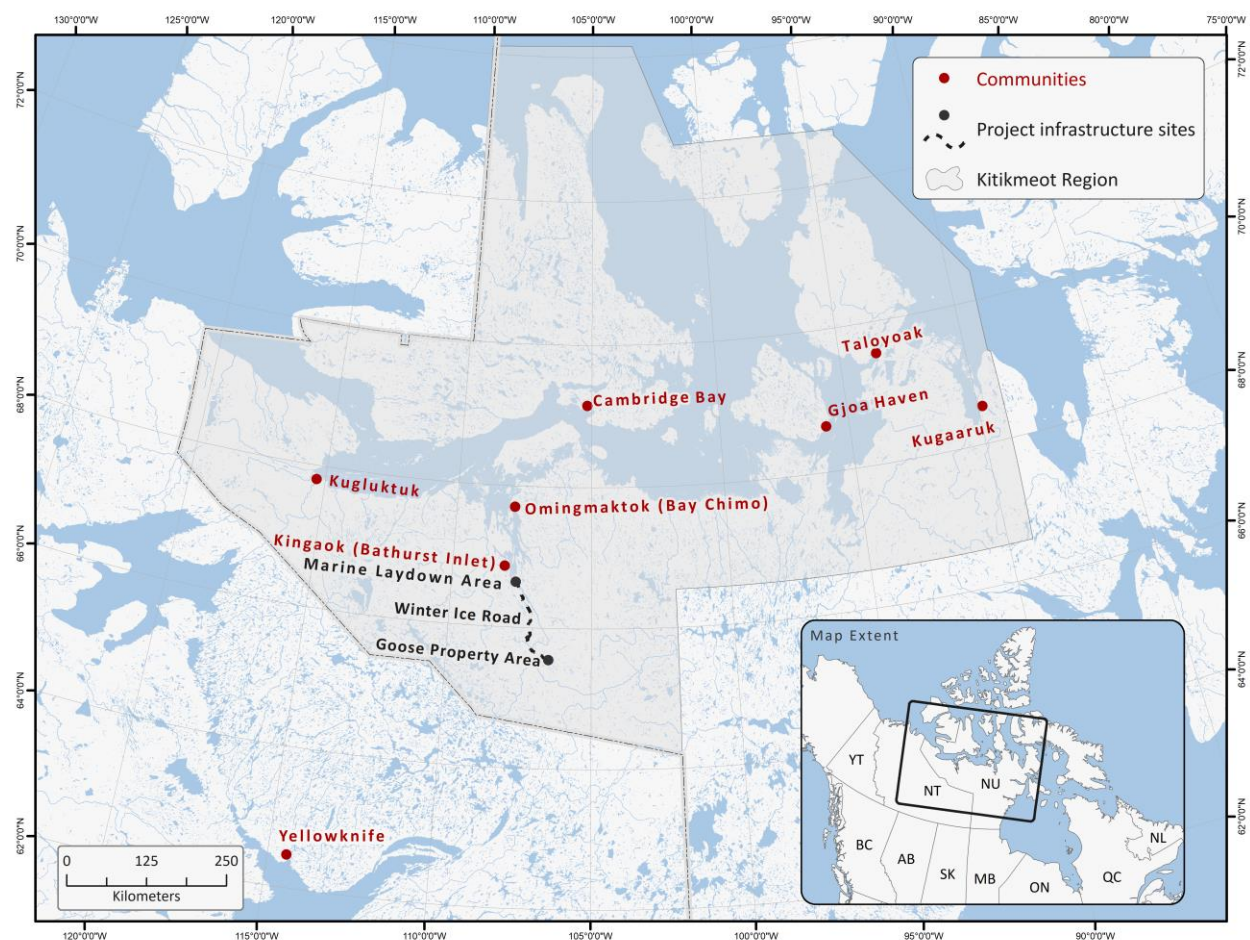
1. INTRODUCTION

1.1 BACK RIVER PROJECT OVERVIEW

The Back River Project (Project) is a gold mining project owned by Sabina Gold & Silver Corp. (Sabina or the Company) located within the western Kitikmeot Region of Nunavut. The Project is comprised of two main areas with an interconnecting Winter Ice Road (WIR): The Goose Property and a Marine Laydown Area (MLA) situated approximately 130km away along the western shore of southern Bathurst Inlet (Figure 1-1). Sabina has stated it intends to build a mine that is safe, environmentally responsible, and beneficial to all parties involved. The Project is anticipated to bring benefits such as employment, training, business and other economic opportunities to the people of the Kitikmeot Region and Nunavut as a whole. After a comprehensive five-year environmental assessment (EA) process, Sabina received its Project Certificate from the Nunavut Impact Review Board (NIRB) on December 19, 2017. Sabina subsequently finalized an Inuit Impact and Benefit Agreement (IIBA) with the Kitikmeot Inuit Association (KIA), with an effective date of June 1, 2018.

The Back River Project Initial Feasibility Study is based on currently identified reserves with a total ore feed of 19.8 million tonnes from several mineral deposits (Umwelt, Llama, and Goose Main) to a 3,000 tonnes per day (t/d) single process plant at the Goose Property. Ore will be mined using conventional open pit and underground methods and will be trucked to the process plant for segregated stockpiling or direct feed to processing. The Project remained in the pre-construction phase in 2019.

Figure 1-1: Project Area, Regional Perspective



1.2 SOCIO-ECONOMIC MONITORING REQUIREMENTS AND GUIDANCE

Project-specific socio-economic monitoring programs in Nunavut are generally expected to focus on two areas: ‘effects monitoring’ and ‘compliance monitoring’. Effects monitoring keeps track of the socio-economic effects of a project to see if management plans are working or if any unexpected effects are occurring. Compliance monitoring occurs to make sure proponents follow the terms and conditions of the licences, decisions, and certificates issued by authorizing agencies (NIRB 2013; NIRB 2018). This focus is commensurate with socio-economic monitoring practices recommended elsewhere (e.g. Noble 2015; Vanclay et al. 2015) and can assist companies with achieving their sustainable development goals. Socio-economic monitoring also supports adaptive management, as findings can alert project proponents to the emergence of unanticipated effects and help initiate a management response. Furthermore, regular review of monitoring plans helps determine whether existing socio-economic indicators and monitoring methods remain appropriate (Vanclay et al. 2015).

Project-related socio-economic monitoring requirements originate from the Nunavut Agreement and NIRB Project Certificate No. 007. The Nunavut Agreement is a comprehensive land claims agreement signed in 1993 between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in Right of Canada. As a result of signing the Nunavut Agreement, Inuit exchanged Aboriginal title to all their traditional land in the Nunavut Settlement Area for a series of rights and benefits. The Nunavut

Agreement also created various ‘institutions of public government’ such as the NIRB, and established conditions for the review and oversight of resource development projects. Referencing Article 12, Part 7 of the Nunavut Agreement, NIRB (2018) provides details on project-specific monitoring programs which may be required under a NIRB project certificate. Specifically, the purpose of these programs is to:

- (a) measure the ecosystemic and socio-economic environments of a project;*
- (b) assess whether the project is in compliance with the prescribed project terms and conditions;*
- (c) share information with regulatory authorities to support enforcement of land, water or resource use approvals and agreements; and*
- (d) assess the accuracy of the predictions contained in the impact statement.*

As noted previously, NIRB issued Project Certificate No. 007 approving the Project on December 19, 2017. NIRB (2017) and later sections of this report should be consulted for additional information on the Terms and Conditions specific to socio-economic monitoring that were included in the Project Certificate.

Some Terms and Conditions relate to Sabina’s engagement with the Kitikmeot Socio-Economic Monitoring Committee (KSEMC) and Back River Socio-Economic Monitoring Working Group (SEMWG). The KSEMC is one of three regional socio-economic monitoring committees in Nunavut. These committees were established in 2007 to address project certificate requirements for project-specific monitoring programs. They create a discussion forum and information sharing hub that supports impacted communities and interested stakeholders to take part in monitoring efforts (SEMCs 2019). 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. A summary of this meeting can be found in Appendix A.

The SEMWG Terms of Reference (TOR) also provides guidance on Sabina’s socio-economic monitoring program. Sabina, in addition to the Government of Nunavut (GN), the Government of Canada, and the Kitikmeot Inuit Association (KIA), is a member of the SEMWG. The SEMWG aims to support Project-specific monitoring in addition to regional monitoring through the KSEMC. The SEMWG is also intended to help satisfy and fulfill parts of the Terms and Conditions set out in Project Certificate No. 007 that relate to socio-economic monitoring. The SEMWG TOR were revised in late 2018 in consultation with SEMWG members and are included in the Socio-Economic Monitoring Plan (Sabina 2018a). The TOR describe the Working Group’s purpose; membership and member roles; reporting, communication, and meeting requirements; and other topics. Furthermore, Section 5.1 of the TOR notes:

“Following Project Certificate issuance and Sabina’s decision to proceed with Project construction, Sabina will prepare an annual socio-economic report for the Project (the “Program Report”), which will be attached to its Annual Report submission to the NIRB. Sabina shall submit annual Program Reports to NIRB on or before March 31 of each year, containing data with respect to the previous calendar year (January to December) which may be presented at the Project, community, and/or regional scale. The Program Report will further describe Sabina’s participation on the KSEMC, other collaborative socio-economic monitoring processes, and other relevant activities related to understanding socio-economic processes.”

As established in the TOR, SEMWG members agreed that collaboration is required to effectively monitor the socio-economic performance of the Project. It was acknowledged that Sabina is best able to collect and provide data concerning workforce information, employment, training and procurement in relation to the Project, and the Government of Nunavut and the Government of Canada are best able to collect and provide public statistics on general health and well-being, food security, demographics, and other socio-economic indicators at the community and territorial level. The KIA was noted to be best able to provide information and data relating to Inuit land use and culture at the community and regional level, if available and appropriate. Sabina is actively involved in the SEMWG and regularly participates in its meetings. Most recently, Sabina met with the SEMWG in April 2019. A summary of this meeting can be found in Appendix A.

The Project's Socio-Economic Monitoring Plan (Sabina 2018a) helps address the requirements and guidance described above. Submission of this annual Socio-Economic Monitoring Report assists with the implementation of this Plan. Sabina has committed to continue addressing its socio-economic monitoring requirements as the Project advances.

1.3 USE OF COMMUNITY PERSPECTIVES AND TRADITIONAL KNOWLEDGE

Community perspectives and Traditional Knowledge (TK) will continue to be considered in the Project's socio-economic monitoring program. For example, they were considered in the identification of Valued Socio-Economic Components (VSECs) and the assessment of Project effects in the Final Environmental Impact Statement (FEIS) (Sabina 2015, 2017); these effects subsequently became a focus of Sabina's Socio-Economic Monitoring Plan (Sabina 2018a). FEIS Volume 3 (Public Consultation and Traditional Knowledge) and Volume 8 (Human Environment) describe how community perspectives and TK were specifically incorporated into Project baseline information, the selection of VSECs, effects assessments, and mitigation and monitoring plans. Sabina also presented early versions of the Socio-Economic Monitoring Plan for stakeholder review and comment.

Moving forward, Sabina has committed to presenting socio-economic monitoring results to the KSEMC and SEMWG at least annually. Sabina's Community Involvement Plan (Sabina 2018b) also outlines how Kitikmeot Region communities will be kept informed about the Project, including the results of monitoring programs. Once formed, the Project's Inuit Environmental Advisory Committee (IEAC) will also be engaged by Sabina. Feedback on Project monitoring programs may be solicited from these parties and suggested improvements may be considered.

Sabina has developed the document 'Guidance for Incorporating Community Perspectives and Traditional Knowledge in the Back River Project's Monitoring Programs' (Appendix B). 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 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.

1.4 REPORT OBJECTIVES AND ORGANIZATION

This is the second annual Socio-Economic Monitoring Report prepared by Sabina for the Project. The content of this report is guided by the Project's Socio-Economic Monitoring Plan (i.e. Sabina 2018a). More specifically, Sabina's reports are intended to assess the socio-economic performance of the Project as it progresses from construction through operations and eventual closure. These reports help accomplish the following objectives of the monitoring program, as identified in the Socio-Economic Monitoring Plan:

1. Verify the accuracy of key predictions made in the FEIS with respect to the direction and magnitude of socio-economic effects, gauge the efficacy of mitigation measures, and facilitate early identification of any unanticipated effects.
2. Contribute to and support adaptive management through evaluation of planned mitigation measures. Monitoring results will be used to provide a basis from which to develop additional or alternative mitigation plans in cases where initial mitigation measures are insufficient or ineffective.
3. Help ensure that, wherever possible, the monitoring program design and methodologies themselves are culturally appropriate and relevant to the issues and concerns of local Inuit, including respect for the confidentiality of certain socio-economic information. In part, this objective will be achieved by the consideration and incorporation of TK into the monitoring program, when and as appropriate. The appropriate incorporation of TK will be guided by and determined in consultation with the SEMWG.

The Project remained in the pre-construction phase in 2019. The socio-economic data presented in this report may thus be limited or will continue to serve as baseline information until construction commences. Performance conclusions may be drawn as additional monitoring data become available in future years.

This report is organized in the following manner:

- Section 1 (i.e. this section) introduces the report and the scope of its contents.
- Section 2 describes the methods used in this report and how they support the conclusions that are reached.
- Sections 3 to 10 assess the socio-economic performance of VSECs included in the FEIS.
- Section 11 provides a report summary and comments on adaptive management.
- Section 12 includes the references cited in this report.
- Appendices A through C provide additional information on Sabina's socio-economic monitoring program.

2. METHODS

2.1 OVERVIEW

This report is intended to assess the socio-economic performance of the Project on an annual basis. To help focus this assessment, monitoring indicators and supporting data sources have been identified for VSECs in the FEIS. The data and analyses presented in this report often focus on one of three spatial scales: The Local Study Area (LSA), Regional Study Area (RSA), or Project level. The LSA includes the Kitikmeot Region communities of Cambridge Bay, Gjoa Haven, Kugaaruk, Kugluktuk, and Taloyoak (Figure 1-1).¹ In some cases, data for the LSA communities may be aggregated to facilitate analysis. The RSA includes the entire territory of Nunavut. Annually produced data are presented where available.

Following the presentation of available indicator data, management and mitigation measures relevant to each VSEC are discussed and an assessment of residual effects predicted to occur in the FEIS is made. Structuring the report in this manner allows predictions to be evaluated against current monitoring data and provides insight into the effectiveness of existing mitigation measures. A compliance assessment of Project Certificate Terms and Conditions relevant to the monitoring of each VSEC is also presented.

Indicator ‘trends’ may be discussed in future reports (i.e. once sufficient data become available) to describe whether an indicator has exhibited change (and the direction/magnitude of that change). This may include trends for ‘pre-development’ (i.e. a defined period preceding Project construction), ‘post-development’ (i.e. the period after Project construction commenced), and ‘since previous year’ (i.e. the two most recent years indicator data are available) periods. Available data and trends may then be assessed in the context of potential Project influences on them. However, the process of socio-economic monitoring may require many years of data to effectively discern trends and causality. Even then, various factors may influence causality, and these may not be easy to individually measure or confirm. Successful socio-economic monitoring for the Project will require appropriate long-term data, the regular input of Project stakeholders, and a focus on continuous improvement.

2.2 SOCIO-ECONOMIC MONITORING INDICATORS

‘Indicators’ are an important aspect of socio-economic monitoring. Indicators are metrics used to measure and report on the condition and trend of a Valued Component (VC)², and help facilitate the analysis of interactions between a project and a selected VC (BCEAO 2013). Indicators can also provide an early warning of potential adverse effects and are considered the most basic tools for analyzing change (Noble 2015).

Socio-economic monitoring indicators have been identified in the Project’s Socio-Economic Monitoring Plan (Sabina 2018a) and are presented in Table 2-1, below. Specifically, Table 2-1 includes indicators and data sources for VSEC-related: a) residual effects; b) topics requested through the Project Certificate; and, c) other topics deemed relevant to the monitoring program. Sabina has acknowledged these indicators and data sources may benefit from additional refinement in the future; suggestions

¹ Kingaok (Bathurst Inlet) and Omingmaktok (Bay Chimo) are also located near the Project. However, inhabitants of these locations are typically seasonal and reside in other communities (e.g. Cambridge Bay) for the remainder of the year. The Government of Nunavut has further deemed these ‘outpost camps’ and not official communities.

² Valued Components are typically referred to as Valued Ecosystem Components (VECs) and Valued Socio-Economic Components (VSECs) in Nunavut.

from reviewers on potential improvements are welcome. It is further acknowledged that any significant changes to the socio-economic monitoring program require discussion with the SEMWG.

Table 2-1: Socio-Economic Monitoring Indicators for the Back River Project

VSEC	Residual Effect or Project Certificate Term and Condition	Topic	Indicator(s)	Data Source	
Population Demographics	Residual Effect	N/A	N/A	N/A	
	Project Certificate Term and Condition	Demographic change (T&C No. 77)	Population estimates	NBS	
			Number of employees (by total, origin, and ethnicity)	Sabina	
			Employee relocations	Sabina	
Employment	Residual Effect	Changes to employment and income levels	Number of employees (by total, origin, and ethnicity)	Sabina	
			Project hours worked (by total, origin, gender, and ethnicity)	Sabina	
			Number and percentage of Inuit in each job category	Sabina	
			Percentage of population receiving social assistance	NBS	
		Changes to the capacity of the labour force	Number of employees (by total, origin, and ethnicity)	Sabina	
			Project hours worked (by total, origin, gender, and ethnicity)	Sabina	
			Number and percentage of Inuit in each job category	Sabina	
			Employees who left positions in their community	Sabina (survey data)	
		Changes to competition for local labour	Turnover rate (by ethnicity)	Sabina	
			Project Certificate Term and Condition	N/A	N/A
	Business Opportunities	Residual Effect	Changes to the growth and diversity of Inuit and northern businesses	Project business expenditures (total and by business type)	Sabina
		Project Certificate Term and Condition	N/A	N/A	N/A
Economic Development	Residual Effect	Changes to economic growth, diversity, and performance	Employee payroll amounts (by origin and ethnicity where appropriate)	Sabina	
			Project business expenditures (total and by business type)	Sabina	
	Project Certificate Term and Condition	N/A	N/A	N/A	
Education and Training	Residual Effect	Changes to the demand for education and training	Hours of training completed (by total, type, and ethnicity)	Sabina	
			Inuit apprenticeships	Sabina	
			Secondary school graduation rate	NBS	
			NAC full-time enrollment by campus	NAC	
		Changes to youth attitudes and behaviours toward education and training	Inuit apprenticeships	Sabina	
			Secondary school graduation rate	NBS	
			NAC full-time enrollment by campus	NAC	
	Project Certificate Term and Condition	Employee education trends (T&C No. 75)	Employee education	Sabina (survey data)	
Health and Community Well-Being	Residual Effect	Changes to life skills of individuals	Project hours worked (by total, origin, gender, and ethnicity)	Sabina	
			Hours of training completed (by total, type, and ethnicity)	Sabina	
			Utilization rate of Employee and Family Assistance Program (EFAP)	Sabina	
		Changes to individual and family spending	Number of impaired driving violations	NBS	

VSEC	Residual Effect or Project Certificate Term and Condition	Topic	Indicator(s)	Data Source
		Changes to family/household structure	Number of drug violations	NBS
			Crime rate	NBS
			Marital status of individuals 15 years and over	Statistics Canada (Census data)
	Project Certificate Term and Condition	Access to housing (T&C No. 84)	Employee changes of address, housing status, and migration intentions	Sabina (survey data)
	Other	Health centre utilization	Number of health centre visits per capita	NBS
		GN emergency health service utilization	Number of times GN emergency health services required	Sabina
		Lost time incidents	Lost time incidents	Sabina
Non-Traditional Land and Resource Use	Residual Effect	Changes to the experience of the natural environment	Number of formal grievances/complaints filed pertaining to non-traditional land and resource use	Sabina
	Project Certificate Term and Condition	N/A	N/A	N/A
Subsistence Economy and Land Use	Residual Effect	Changes in access to land and resources	Number of land use visitor person-days at Project sites	Sabina
			Number of wildlife compensation payments made	Sabina
			Number of formal grievances/complaints filed pertaining to the subsistence economy and land use	Sabina
		Changes to the experience of the natural environment	Number of land use visitor person-days at Project sites	Sabina
			Number of wildlife compensation payments made	Sabina
			Number of formal grievances/complaints filed pertaining to the subsistence economy and land use	Sabina
		Changes to the abundance and distribution of resources	Potential effects will be tracked through Sabina's terrestrial, freshwater, and marine environment monitoring programs	
	Project Certificate Term and Condition	Public use of Winter Ice Road (T&C No. 80)	Number of times public use of the Project's Winter Ice Road reported	Sabina

2.3 DATA SOURCES

Data for this report have been obtained from Company, government, and other sources. Data are presented in textual, graphical, or tabular formats, with a source identified for each. Company data sources include employment, training, and contracting records; and information obtained from other Project-related records and sources. Employment data (i.e. data on employee and contractor origin/headcount, Project hours worked) include employees and contractors who performed Nunavut-based Project work (primarily site-based, but may include community-based or other positions). Otherwise, these data do not include individuals who worked on the Project outside of Nunavut, Sabina corporate office staff, or off-site contractors. In addition, Sabina anticipates presenting results from an Inuit Employee Survey in future monitoring reports. The timing and frequency of this survey will be determined in consultation with the SEMWG after Project construction activities begin. A draft version of this survey was provided in Sabina's 2018 Socio-Economic Monitoring Report (i.e. JPCSL 2019).

Government data have been obtained primarily from the Nunavut Bureau of Statistics (NBS), the Government of Nunavut's central statistical agency. NBS posts current Nunavut population data, economic data, labour force and employment data, social data, census data, and Nunavut Housing Survey data through the Government of Nunavut's Department of Executive and Intergovernmental Affairs website (<https://www.gov.nu.ca/eia/information/nunavut-bureau-statistics>) for the public to use. The report from the most recent KSEMC annual meeting (i.e. April 2019) has also been reviewed for relevant data and insights. Some data have also been obtained from other sources (e.g. Statistics Canada, Nunavut Arctic College, other organizations) where appropriate.

2.4 DATA LIMITATIONS

Some data limitations were identified during the preparation of this report. For example, limited Project data have been presented at this time. This is because the Project remained in the pre-construction phase in 2019, some monitoring programs are still under development, and/or collection of relevant data have not yet begun. Data in this report are also presented for the most recent year that is currently available. Lag times in data availability exist for some (primarily government) sources and data for the current year were not available in all cases. Some data are also only available for multi-year periods (e.g. national Census data, produced every five years), or only at the regional or territorial scale (rather than a community scale).

Sabina has committed to continue developing and refining its socio-economic monitoring and reporting systems as the Project advances. Where data limitations may exist, efforts will be made to identify these in the Socio-Economic Monitoring Report and/or present data and analyses in an appropriately conservative manner.

2.5 CHANGES SINCE PREVIOUS YEAR'S REPORT

A small number of changes have been made to this report since the previous year (Table 2-2). This section will continue to be updated in future reports to reflect additional monitoring report and/or program improvements identified by Sabina.

Table 2-2: Key Changes Since Previous Year's Report

Description of Change	Reason for Change	Report Reference
Indicator renamed from 'Utilization of Local, Regional, and Territorial Educational Opportunities by Project Employees' to 'Employee Education'	Renaming of indicator better reflects data that will be collected for both 'Highest Level of Education Obtained (Inuit Employee Survey Results)' and 'Utilization of Local, Regional, and Territorial Educational Opportunities by Project Employees (Inuit Employee Survey Results)'	Section 2.2 Section 7.1.6
Reporting commenced on 'Number of Wildlife Compensation Payments Made'	Data have become available	Section 10.1.2
Reporting commenced on 'Number of Times Public Use of Project Winter Ice Roads Reported'	2019 represented Sabina's inaugural WIR season, resulting in data becoming available	Section 10.1.4
Inclusion of 'Guidance for Incorporating Community Perspectives and Traditional Knowledge in the Back River Project's Monitoring Programs'	Included to address Project Certificate Term and Condition No. 78	Appendix B
Inclusion of 'Outfitting/Guiding Business Consultation Protocol'	Included to address Project Certificate Term and Condition No. 81	Appendix C

3. POPULATION DEMOGRAPHICS

3.1 INDICATOR DATA AND ANALYSIS

3.1.1 Population Estimates

Population data are a fundamental component of many socio-economic monitoring programs. Population estimates for the Kitikmeot Region and Nunavut are provided by NBS (2019a) and are presented in Table 3-1.³ 2018 was the most recent year population estimates were available. In 2018, the Kitikmeot Region had a population of 6,902 while Nunavut had a population of 38,396.

Between 2009 and 2018, the Kitikmeot Region grew from a population of 6,032 to 6,902 (or 14.4%). Nunavut grew from a population of 32,600 to 38,396 (or 17.8%). Average annual growth rates over this period for the Kitikmeot Region (1.9%) and Nunavut (1.9%) were higher than the Canadian average (1.0%) (Statistics Canada 2018a). Population growth in Nunavut remains high due to the territory having the highest birth rate in Canada and a young population profile (Statistics Canada 2017b, 2018b, 2020a). Figure 3-1 displays population data for the Kitikmeot Region and Nunavut since 2009.

Table 3-1: 2018 Population Estimates

2018 Population Estimates	
Community/Region	Total Population
Kitikmeot Region	6,902
• Cambridge Bay	1,858
• Gjoa Haven	1,405
• Kugaaruk	1,028
• Kugluktuk	1,531
• Taloyoak	1,080
Nunavut	38,396

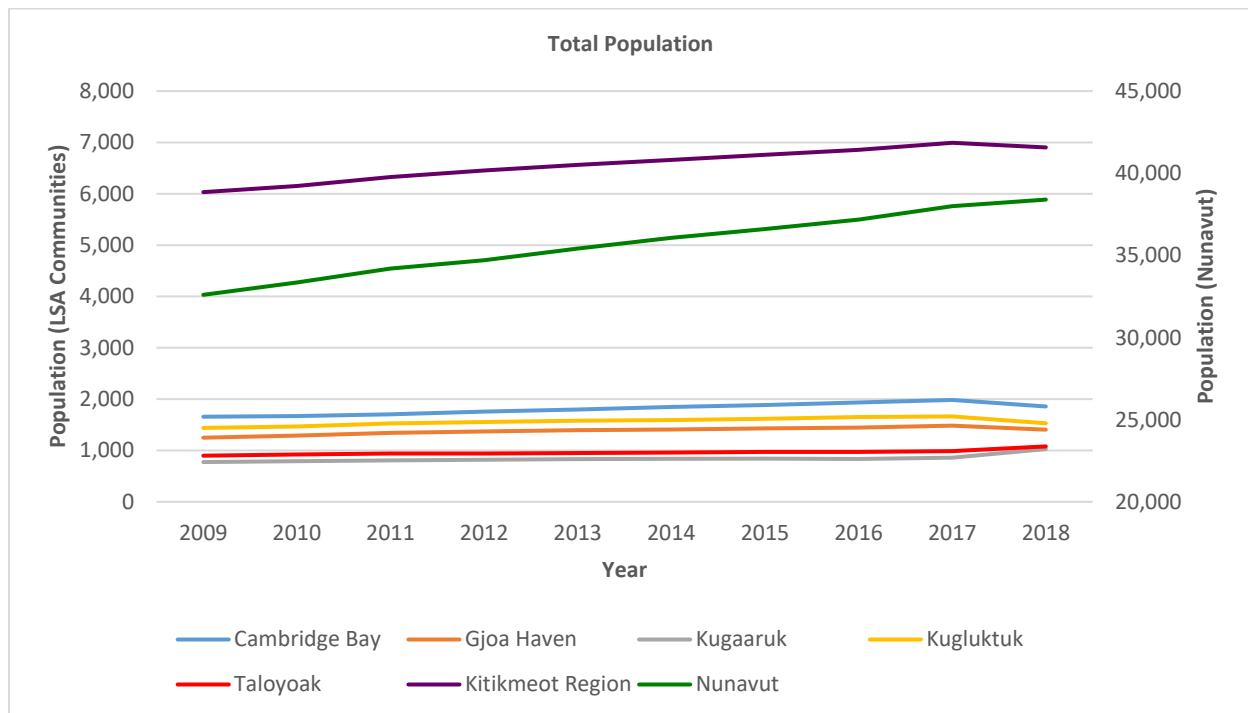
Source: NBS (2019a)

The percentage of Inuit versus non-Inuit residents in the Kitikmeot Region remains high. An average 89.5% of Kitikmeot Region residents were Inuit from 2009 to 2016. Figure 3-2 displays the percentage of Inuit versus non-Inuit residents in the Kitikmeot Region from 2009 to 2016 (NBS 2016).

These data will continue to serve as baseline information until a Project production decision has been made by Sabina and formal construction activities begin. Additional analysis will be completed as data become available in future years.

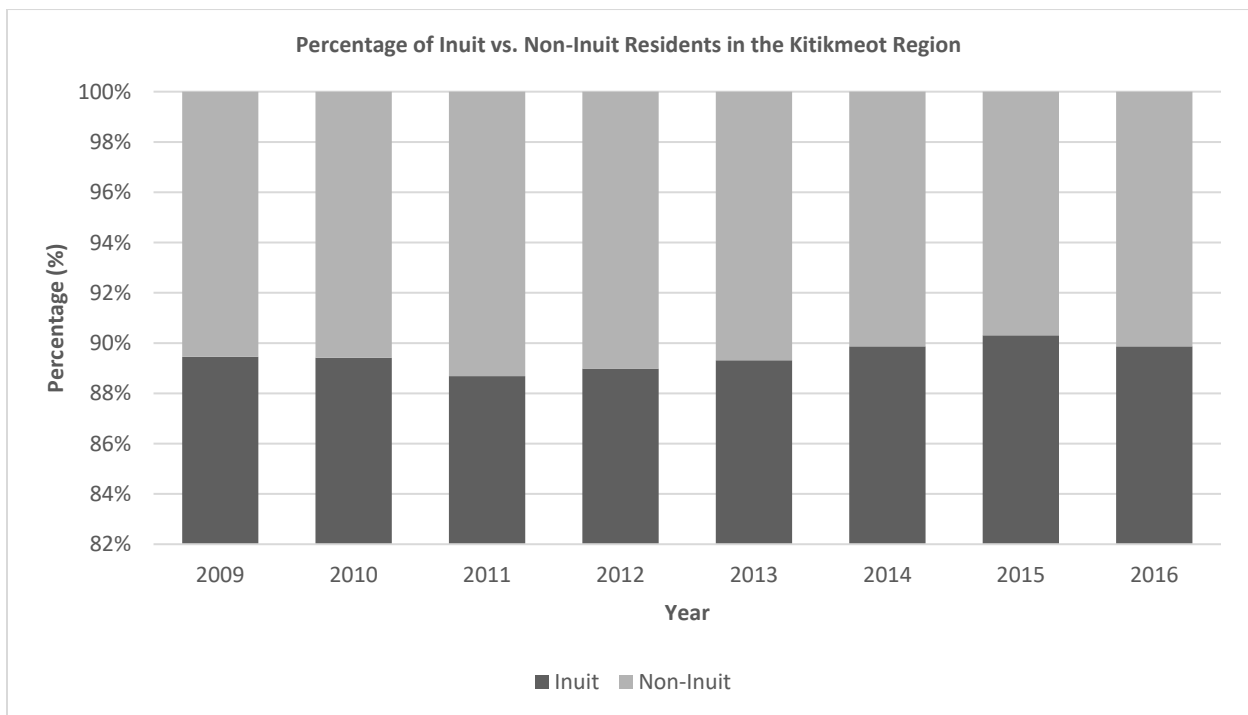
³ NBS (2019a) notes community population estimates are preliminary and subject to revision. 2018 estimates, in particular, are to be viewed with some caution, as these are in early preliminary stages.

Figure 3-1: Total Population (2009 to 2018)



Source: NBS (2019a)

Figure 3-2: Percentage of Inuit Versus Non-Inuit Residents in the Kitikmeot Region (2009 to 2016)



Source: NBS (2016)

3.1.2 Number of Employees

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 (Table 3-2). 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). Table 3-2 presents the total number of individuals who worked on the Project in 2019 rather than being a point-in-time count.

The Project employed several Inuit from the LSA communities in 2019, which likely reflects the Inuit hiring commitments Sabina has made in those locations. All non-Inuit individuals in 2019 came from Canadian provinces and territories other than Nunavut, or from international locations. Mining projects typically require many employees with various skill sets. Individuals with advanced mining and/or technical skill sets are in limited supply in Nunavut (e.g. MIHR 2014, 2015; Conference Board of Canada 2016, 2019). The large number of Project employees from outside of Nunavut is considered to at least partly reflect this skills gap. The employment numbers presented in Table 3-2 also reflect the limited and short-term/seasonal nature of pre-construction activities that occurred in 2019.

Table 3-2: Number of Back River Project Employees and Contractors by Origin and Ethnicity

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

3.1.3 Employee Relocations

Data on employee relocations provide insight into potential demographic changes that may be occurring as a result of the Project. 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. This section has been included as a placeholder for future years. Additional analysis will be completed as data become available.

3.2 EFFECTS AND COMPLIANCE ASSESSMENT

3.2.1 Management and Mitigation Measures

No specific management and mitigation measures for the Population Demographics VSEC were developed by Sabina, although the IIBA (KIA and Sabina 2018) and Human Resources Plan (Sabina 2018c) contain related commitments. These include priority hiring of Kitikmeot Inuit and other Nunavut Inuit residents in the Kitikmeot Region, and the provision of free employee transportation to and from the communities of the Kitikmeot Region to the Project. A southern pick-up point will also be established. These measures are anticipated to reduce the potential for significant demographic change in the Kitikmeot Region.

3.2.2 Effects Assessment

There were no residual effects identified in the FEIS for the Population Demographics VSEC.

3.2.3 Compliance Assessment

There is one Term and Condition in the Project Certificate pertaining to the Population Demographics VSEC. The status of this is summarized in Table 3-3.

Table 3-3: Terms and Conditions for the Population Demographics VSEC

Term and Condition No.	Description	Status
77	Provided the collection and sharing of such information is consistent with and not limited by any IIBA with the KIA, 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 SEMWG.	<p>This topic is addressed in Section 3.1.2 (Number of Employees) and Section 3.1.3 (Employee Relocations) of this report.</p> <p>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.</p>

4. EMPLOYMENT

4.1 INDICATOR DATA AND ANALYSIS

4.1.1 Project Hours Worked

The total hours of Project labour performed each year is a useful indicator of the Project's overall labour demand. When disaggregated, data on hours worked can also provide insight into the varying labour contributions of the Project's workforce (e.g. by ethnicity, origin, and gender). In 2019, a total of 145,171 hours of Project labour were performed by employees and contractors, which is equal to approximately 70 Full Time Equivalent (FTE) positions.⁴ 21,735 hours (or 15.0%) were performed by Inuit and 123,436 hours (or 85.0%) were performed by non-Inuit (Table 4-1). These employment numbers reflect the limited and short-term/seasonal nature of pre-construction activities that occurred in 2019. However, existing Inuit employment opportunities likely also reflect the commitments Sabina has made through the IIBA and elsewhere.

Table 4-1: Hours of Project Labour Performed in Nunavut

Hours of Project Labour Performed in Nunavut			
Employee Ethnicity & Origin		2019	
		Hours Worked	% of Total (145,171)
Inuit	Kitikmeot Inuit	19,184	13.2%
	Nunavut Inuit Residing in the Kitikmeot Region	0	0.0%
	Kitikmeot Inuit Residing Elsewhere	2,551	1.8%
	Nunavut Inuit Residing Elsewhere	0	0.0%
	Inuit (Total)	21,735	15.0%
Non-Inuit	Kitikmeot Resident	0	0.0%
	Nunavut Resident (but not in Kitikmeot Region)	0	0.0%
	Non-Resident	123,436	85.0%
	Non-Inuit (Total)	123,436	85.0%
TOTAL		145,171	100.0%

Source: Sabina

Table 4-2 displays the hours (and percentage of hours) worked by women and men on the Project in 2019. 16,481 hours (or 11.4% of total hours worked on the Project) were worked by women in 2019. The percentage of hours worked by Inuit women (1.9%) was lower than non-Inuit women (9.5%) in 2019. However, the percentage of hours worked by Inuit women compared to Inuit men on the Project

⁴ FTEs are calculated assuming 2,080 hours of employment per person annually.

(approximately 12.5% of this total) was higher than non-Inuit women compared to non-Inuit men (approximately 11.2% of this total) in 2019. It should be noted that women remain under-represented in the Canadian mining industry as a whole. The Mining Industry Human Resources Council (2018) notes women comprise about 16% of the total Canadian mining, quarrying, and oil and gas extraction workforce, which is significantly lower than the total participation of women in the general Canadian workforce, at 48%. Indigenous women are also less likely than non-Indigenous women to be employed in Canada (Arriagada 2016).

Table 4-2: Hours of Project Labour Performed in Nunavut, by Ethnicity and Gender

Hours of Project Labour Performed in Nunavut, by Ethnicity and Gender			
Employee Ethnicity & Gender		2019	
		Hours Worked	% of Total (145,171)
Inuit	Male	19,021	13.1%
	Female	2,714	1.9%
Non-Inuit	Male	109,669	75.5%
	Female	13,767	9.5%
Total		145,171	100.0%

Source: Sabina

4.1.2 Number and Percentage of Inuit in Each Job Category

Data on the number and percentage of Inuit in each job category can provide insight into the varying labour contributions of the Project's Inuit workforce. 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. Table 4-3 has been included as a placeholder for future years and formal job categories will be developed at a later date. Additional analysis will be completed as data become available in future years.

Table 4-3: Number and Percentage of Inuit in Each Job Category

Number and Percentage of Inuit in Each Job Category		
Job Category	Year	
	Number	% of Total
Job Category	–	–
Job Category	–	–
Job Category	–	–
...	–	–
Total	–	–

Source: Sabina

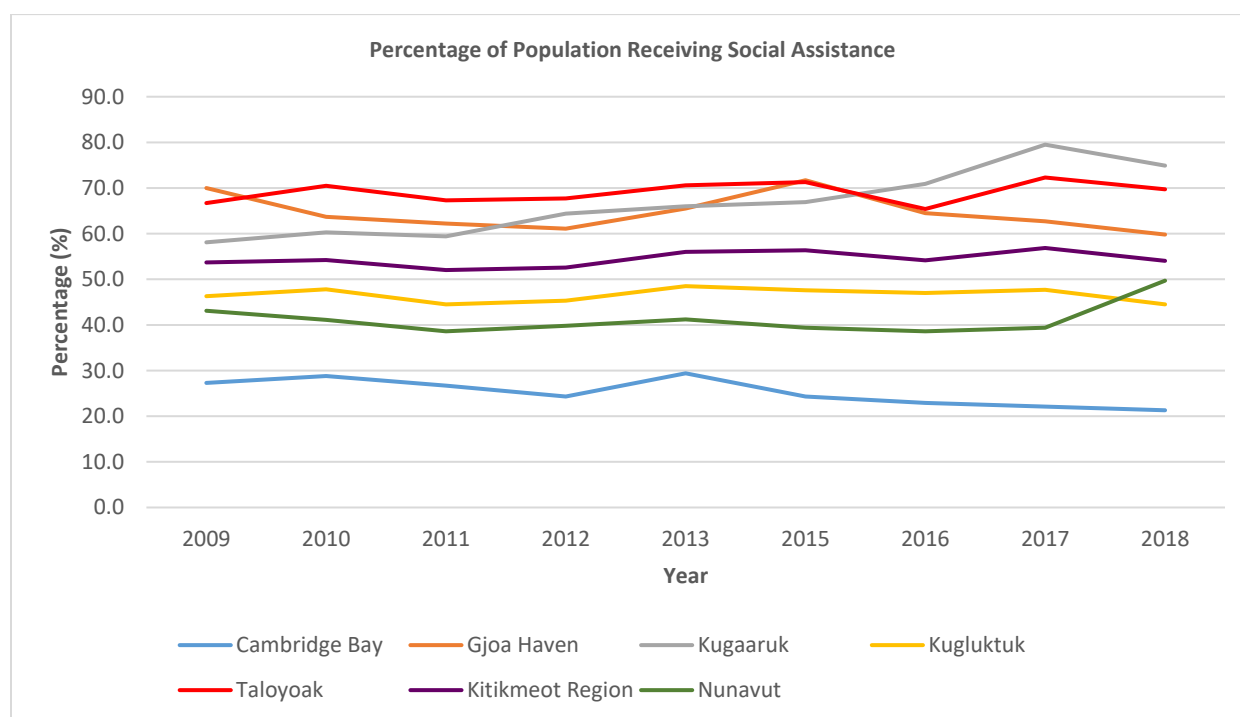
4.1.3 Percentage of Population Receiving Social Assistance

The percentage of the population receiving social assistance can provide insight into employment and income level changes which may be introduced by the Project. Social assistance data are available from NBS (2019b). Figure 4-1 displays the percentage of population receiving social assistance from 2009 to 2018 (2014 data are unavailable). The Kitikmeot Region average during this period was 54.4%, which was higher than the Nunavut average of 41.2%. Taloyoak had the highest average (69.1%) in the Kitikmeot Region during this period, while Cambridge Bay had the lowest (25.2%).

Social assistance use remains high in Nunavut.⁵ While social assistance rates can be influenced by many factors, it should be noted Nunavut's unemployment rate was 11.6% in December 2019, which was more than double the national average of 5.6% for the same time period (Statistics Canada 2020b, 2020c). As well, the cost of living in Nunavut is much higher than in the rest of the country. For example, according to the federal government's Nutrition North Canada subsidy program, the 2016 cost of a basket of food to feed a family of four in Nunavut communities eligible for the subsidy was \$22,368 per year (Government of Canada 2018). That same year, the average Canadian household spent about \$6,176 on food from stores (Statistics Canada 2020d).

These data will continue to serve as baseline information until a Project production decision has been made by Sabina and formal construction activities begin. Additional analysis will be completed as data become available.

Figure 4-1: Percentage of Population Receiving Social Assistance (2009 to 2018)



Source: NBS (2019b)

Notes: No data available for 2014

4.1.4 Employees who Left Positions in their Community

Data on employees who left positions in their community can provide insight into potential competition for local labour introduced by the Project. No data on this topic are expected to be available until after

⁵ Comparative data are available through sources other than NBS (i.e. Maytree 2019; Statistics Canada 2018c). These indicate the percentage of Canada's population receiving social assistance in 2018 was 5.2%, whereas for Nunavut this percentage was 38.1%. Social assistance percentages were calculated using the number of social assistance recipients identified in Maytree (2019) and 2017 population data presented by Statistics Canada (2018c). Comparative data should be used with caution, however, as each province/territory has unique social assistance programs and may report numbers of recipients differently.

a Project production decision has been made by Sabina and formal construction activities begin. Following this, an Inuit Employee Survey may be administered to help obtain this information. Table 4-4 has been included as a placeholder for future years. Additional analysis will be completed as data become available.

Table 4-4: Employment Status Prior to Project Employment (Inuit Employee Survey Results)

Employment Status Prior to Project Employment (Inuit Employee Survey Results)		
Pre-Employment Status	Number of Respondents	Percentage of Respondents
<i>Did you resign from a previous job in order to take up employment with the Back River Project? (n=N/A)</i>		
Yes	–	–
No	–	–
Unknown	–	–
Total	–	–
<i>If yes, what was your previous employment status? (n= N/A)</i>		
Casual	–	–
Part-time	–	–
Full-time	–	–
Total	–	–

Source: Sabina

4.1.5 Turnover Rate

Data on Inuit employee turnover can provide insight into Inuit career progression and stability of employment at the Project. The term ‘turnover’ is inclusive of many different components including resignation, layoff, termination, end of contract, and retirement. Low turnover indicates a greater number of individuals are maintaining stable employment and able to take advantage of potential advancement opportunities. 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. Table 4-5 has been included as a placeholder for future years. Additional analysis will be completed as data become available.

Table 4-5: Sabina Employee Departures

Sabina Employee Departures				
Year	Inuit Employees		Non-Inuit Employees	
	Number of Departures	Turnover Rate	Number of Departures	Turnover Rate
Year	–	–	–	–

Source: Sabina

4.2 EFFECTS AND COMPLIANCE ASSESSMENT

4.2.1 Management and Mitigation Measures

Several management and mitigation measures have been developed by Sabina in relation to the Employment VSEC. These are described in the IIBA (KIA and Sabina 2018), Human Resources Plan (Sabina 2018c), Business Development Plan (Sabina 2018d), and Socio-Economic Monitoring Plan (Sabina 2018a) and include:

- Preferential employment opportunities for Inuit
- Provision of free employee transportation to and from Kitikmeot Region communities to the Project
- Establishment of Inuit employment targets
- Promotion of employment opportunities in Kitikmeot Region communities
- Development of approaches to reduce absenteeism and turnover
- Consideration of skill equivalencies and flexibility in language requirements for employment
- Training and career development opportunities for Inuit
- Preferential contracting opportunities for Inuit businesses
- Socio-economic monitoring of employment indicators

4.2.2 Effects Assessment

There were three residual effects for the Employment VSEC assessed in the FEIS. Monitoring results applicable to these are summarized in Table 4-6.

Table 4-6: Effects Assessment for the Employment VSEC

Residual Effect	FEIS Conclusion	Monitoring Results
Changes to Employment and Income Levels	The Project is anticipated to increase employment and income levels within the Kitikmeot Region and Nunavut, as well as elsewhere in Canada. The provision of employment opportunities has the potential to result in substantial positive benefits for the Kitikmeot. Increased income and employment levels are anticipated to have a positive residual effect on the Employment VSEC.	As the Project has not begun construction, it's too early to assess whether notable changes to employment and income levels have been realized and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.
Changes to the Capacity of the Labour Force	The Project is anticipated to increase the capacity of the labour force in the Kitikmeot Region. At present, Kitikmeot residents face a number of barriers to employment including lack of experience and opportunity. The Project has the potential to alter outcomes for those who become employed directly or indirectly, increasing the ability of individuals and communities to engage in the wage economy. The increased capacity of the labour force is anticipated to have a positive residual effect on regional levels of employment generally, and on the Employment VSEC.	As the Project has not begun construction, it's too early to assess whether notable changes to the capacity of the labour force have been realized and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.
Changes to Competition for Local Labour	The provision of Project employment is expected to produce substantial benefits in the Kitikmeot Region. These employment opportunities may result in competition for labour locally as a result of the demand for skilled labour and the higher than average incomes often associated with mine employment. This effect is expected to be negative in direction and low in magnitude. The magnitude is assessed as low because the expected competition for labour is anticipated to be minimal and to affect a small number of operations/businesses. This effect is determined to be Not Significant based on the low magnitude,	As the Project has not begun construction, it's too early to assess whether notable changes to competition for local labour have been realized and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.

Residual Effect	FEIS Conclusion	Monitoring Results
	limited geographic extent, and reversible nature of the effect.	

4.2.3 Compliance Assessment

There are two Terms and Conditions in the Project Certificate pertaining to the Employment VSEC. The status of these are summarized in Table 4-7.

Table 4-7: Terms and Conditions for the Employment VSEC

Term and Condition No.	Description	Status
71	To the extent the sharing of such information is consistent with and not limited by any IIBA with the KIA, and in consultation with the GN 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.	Annual monitoring is not required; this information is submitted separately by Sabina to NIRB as appropriate. The most recent staff schedule information update was provided to NIRB in April 2018. Sabina anticipates providing additional staff schedule information once a construction decision has been made.
72	The Proponent is encouraged to identify and register all trades occupations, journeypersons, and apprentices working with the Project, as well as to provide the GN with information regarding the number of registered apprentices and journeypersons from other jurisdictions employed at the Project.	This Term and Condition is addressed in Sabina's Annual Report to NIRB.

5. BUSINESS OPPORTUNITIES

5.1 INDICATOR DATA AND ANALYSIS

5.1.1 Project Business Expenditures by Business Type

The value of Project business expenditures is a useful indicator of the business opportunities created by the Project. When disaggregated, these data also provide insight into the opportunities created for different business types. In 2019, a total of \$27.1 million in expenditures were made to 240 businesses. Of this, \$16.4 million (or 60.5%) in expenditures were made to 73 northern businesses (including Kitikmeot Qualified Businesses, NTI Registered Inuit Firms, Nunavut Businesses, and other Northern Businesses). \$5.6 million (or 20.7%) in expenditures were made to 14 Kitikmeot Qualified Businesses (Table 5-1). This indicator includes any amounts spent by Sabina on Project-related business expenditures and is not limited to amounts spent only in Nunavut or through formally negotiated contracts.

These business expenditures reflect the limited and short-term/seasonal nature of pre-construction activities that occurred in 2019. However, existing Inuit business opportunities likely also reflect the commitments Sabina has made through the IIBA and elsewhere.

Table 5-1: Project Business Expenditures by Business Type

Project Business Expenditures		
Business Type	2019	
	Number of Businesses Expenditures Made To	Value of Business Expenditures (\$CAD)
Kitikmeot Qualified Businesses	14	\$5.6 million
NTI Registered Inuit Firms	4	\$0.6 million
Nunavut Businesses (NNI)	1	–
Other Northern Businesses	54	\$10.2 million
Other Businesses	167	\$10.7 million
Total	240	\$27.1 million

Source: Sabina

Notes: 1. The value of business expenditures made to Nunavut Businesses in 2019 fell below a minimum monetary reporting threshold established by Sabina. 2. Kitikmeot Qualified Businesses (KQB) are those included on the KIA's Kitikmeot Qualified Business Registry. NTI Registered Inuit Firms are those included on NTI's Inuit Firm Registry (see <http://inuitfirm.tunngavik.com/>); for the purposes of this table KQB are not included. Nunavut Businesses are those included on the Nunavummi Nangminiaqtunik Ikajuuti (NNI) Registry (see <http://nni.gov.nu.ca/business/search>); for the purposes of this table KQB and NTI Registered Inuit Firms are not included. Other Northern Businesses refers to other businesses operating in Northwest Territories, Yukon, or Nunavut; for the purposes of this table KQB, NTI Registered Inuit Firms, and Nunavut Businesses (NNI) are not included. Other Businesses refers to all other businesses Sabina had Project expenditures with.

5.2 EFFECTS AND COMPLIANCE ASSESSMENT

5.2.1 Management and Mitigation Measures

Several management and mitigation measures have been developed by Sabina in relation to the Business Opportunities VSEC. These are described further in the IIBA (KIA and Sabina 2018), Business Development Plan (Sabina 2018d), and Socio-Economic Monitoring Plan (Sabina 2018a) and include:

- Preferential contracting opportunities for Inuit businesses
- Community-based investments for business development (e.g. Business Development Fund)
- Local business and entrepreneur capacity building
- Socio-economic monitoring of business opportunities indicators

5.2.2 Effects Assessment

There was one residual effect for the Business Opportunities VSEC assessed in the FEIS. Monitoring results applicable to this are summarized in Table 5-2.

Table 5-2: Effects Assessment for the Business Opportunities VSEC

Residual Effect	FEIS Conclusion	Monitoring Results
Changes to the Growth and Diversity of Inuit and Northern Businesses	The Project is anticipated to result in the growth and diversity of Inuit and northern business as linked to Project related expenditure, contract, and sub-contract work. Changes to the growth and diversity of Inuit and northern business are anticipated to have a positive residual effect on the Business Opportunities VSEC.	As the Project has not begun construction, it's too early to assess whether notable changes to the growth and diversity of Inuit and northern businesses have been realized and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.

5.2.3 Compliance Assessment

There are no Terms and Conditions in the Project Certificate pertaining to the Business Opportunities VSEC.

6. ECONOMIC DEVELOPMENT

6.1 INDICATOR DATA AND ANALYSIS⁶

6.1.1 Employee Payroll Amounts

Employee payroll expenditures are one useful indicator of the economic benefits provided by the Project. In 2019, approximately \$1.3 million was spent on Sabina's employee payroll, \$312,000 of which (24.1%) was spent on Inuit employees (Table 6-1). These payroll values reflect the limited and short-term/seasonal nature of pre-construction activities that occurred in 2019. Furthermore, these values do not include any payroll expenditures to contractors working for Sabina; contractors represented most of the Project workforce in 2019. Existing Inuit employment opportunities likely reflect the commitments Sabina has made through the IIBA and elsewhere.

Table 6-1: Employee Payroll Amounts

Employee Payroll Amounts			
Employee Ethnicity & Origin		2019	
		Payroll Value (Gross \$CAD)	% of Total
Inuit	Kitikmeot Inuit	\$285,603.33	22.0%
	Nunavut Inuit Residing in the Kitikmeot Region	\$0.00	0.0%
	Kitikmeot Inuit Residing Elsewhere	\$26,665.95	2.1%
	Nunavut Inuit Residing Elsewhere	\$0.00	0.0%
	Inuit (Total)	\$312,269.28	24.1%
Non-Inuit	Kitikmeot Resident	\$0.00	0.0%
	Nunavut Resident (but not in Kitikmeot Region)	\$0.00	0.0%
	Non-Resident	\$984,097.70	75.9%
	Non-Inuit (Total)	\$984,097.70	75.9%
TOTAL		\$1,296,366.98	100.0%

Source: Sabina

Notes: This table includes payroll amounts for Sabina employees and individuals on direct contract with Sabina (primarily site-based, but may include Sabina community-based or other positions), but only for Project work performed in Nunavut. This table does not include amounts paid to contractors or for Project work performed outside of Nunavut. Unless they met the above criteria, this table also doesn't include amounts paid to Sabina corporate office staff.

⁶ Additional indicator data relevant to this VSEC (i.e. Project business expenditures by business type) are provided in Section 5 (Business Opportunities).

6.2 EFFECTS AND COMPLIANCE ASSESSMENT

6.2.1 Management and Mitigation Measures

Several management and mitigation measures have been developed by Sabina in relation to the Economic Development VSEC. These are described in the IIBA (KIA and Sabina 2018), Business Development Plan (Sabina 2018d), Human Resources Plan (Sabina 2018c), and Socio-Economic Monitoring Plan (Sabina 2018a) and include:

- Preferential contracting opportunities for Inuit businesses
- Community-based investments for business development (e.g. Business Development Fund)
- Local business and entrepreneur capacity building
- Preferential employment opportunities for Inuit
- Training and career development opportunities for Inuit
- Regional Wealth Creation Investment Fund
- Other financial commitments and benefits
- Socio-economic monitoring of economic development indicators

6.2.2 Effects Assessment

There was one residual effect for the Economic Development VSEC assessed in the FEIS. Monitoring results applicable to this are summarized in Table 6-2.

Table 6-2: Effects Assessment for the Economic Development VSEC

Residual Effect	FEIS Conclusion	Monitoring Results
Changes to Economic Growth, Diversity, and Performance	The Project is expected to increase economic growth, diversity, and performance. Contributions to GDP and tax revenues would be substantial. The Project has the potential to reshape the economy of the Kitikmeot, as one that is increasingly experienced and diverse, and able to support various types of development. Increased economic growth, diversity, and performance are expected to have a positive residual effect on the VSEC Economic Development.	As the Project has not begun construction, it's too early to assess whether notable changes to economic growth, diversity, and performance have been realized and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.

6.2.3 Compliance Assessment

There are five Terms and Conditions in the Project Certificate pertaining to the Economic Development VSEC. The status of these are summarized in Table 6-3.

Table 6-3: Terms and Conditions for the Economic Development VSEC

Term and Condition No.	Description	Status
66	The Proponent is strongly encouraged to participate in the work of the KSEMC along with other agencies and the communities of the Kitikmeot Region, and to identify areas of mutual	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 this report. Sabina's participation in

Term and Condition No.	Description	Status
	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.	the KSEMC and SEMWG is summarized in Section 1.2 (Socio-Economic Monitoring Requirements and Guidance) and Appendix A (KSEMC & SEMWG Meeting Minutes) . Sabina's use of community perspectives and TK in the monitoring program is described in Section 1.3 (Use of Community Perspectives and TK) . Sabina will continue to engage the KSEMC, SEMWG, and community stakeholders on the Project's monitoring program.
67	The Proponent should work with other socio-economic stakeholders including the KIA, the GN, CIRNAC, and communities of the Kitikmeot Region, to establish a SEMWG for the Project to develop and oversee the Back River Socio-Economic Monitoring Program. The SEMWG should develop Terms of Reference outlining each member's roles and responsibilities for Project-specific socio-economic monitoring throughout the life of the Project.	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 this report. A final 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. Sabina will continue to engage the SEMWG on the Project's monitoring program.
68	The Proponent should develop a Project-specific Back River Socio-Economic Monitoring Program designed to: <ul style="list-style-type: none"> • Monitor for Project-induced effects, including the impacts predicted in the FEIS through indicators presented in the Back River Socio-Economic Monitoring Plan; • Reflect regional socio-economic concerns identified by the KSEMC; • Work in collaboration with all other socio-economic stakeholders such as the KIA, the GN, and CIRNAC, and the communities of the Kitikmeot Region to develop the program; and • Include a process for adaptive management and mitigation to respond if unanticipated impacts are identified. 	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 this report also summarize the Project's monitoring framework. 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) , 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 Section 11.2 (Adaptive Management) of this report. Monitoring program results will continue to be presented in Sabina's annual Socio-Economic Monitoring Report. Sabina will also continue to engage the KSEMC, SEMWG, and community stakeholders on the Project's monitoring program.
69	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.	Sabina provided the report ' <i>Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects</i> ' (i.e. JPCSL 2018) to NIRB in September 2018. No further updates to this report are considered necessary at this time.
70	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.	Sabina provided updated versions of the following management plans to NIRB in December 2018: <ul style="list-style-type: none"> • Business Development Plan • Community Involvement Plan

Term and Condition No.	Description	Status
		<ul style="list-style-type: none"> • Human Resources Plan • Socio-Economic Monitoring Plan <p>Mitigation and management measures applicable to temporary closure are included in these plans, including new measures identified in JPCSL (2018). No further updates to these plans are considered necessary at this time.</p>

7. EDUCATION AND TRAINING

7.1 INDICATOR DATA AND ANALYSIS

7.1.1 Hours of Training (Total) Completed

The number of training hours completed by Project employees is a useful indicator of the magnitude of Sabina's annual training efforts. A total of 189 hours of training were completed in 2019, of which 84 hours (44.4%) were completed by Inuit (Table 7-1). This indicator includes training offered by Sabina to employees and contractors at Project sites; it does not include training that may have been offered directly by contractors to their own employees. These training hours also reflect the limited and short-term/seasonal nature of pre-construction activities that occurred in 2019.

Table 7-1: Hours of Training (Total) Completed

Hours of Training (Total) Completed			
Year	Inuit	Non-Inuit	Total
2018	179	328	507
2019	84	105	189
Total	263	433	696

Source: Sabina

7.1.2 Hours of Training (by Type) Completed

The types of training provided by Sabina help reveal the full scope of learning opportunities available at the Project. Ten types of training were offered on-site in 2019 (Table 7-2). Training with the highest levels of Inuit participation in 2019 included Fire Response (20 hours), Plane Fuel Offload (12 hours), IT28 Loader (12 hours), and Boat (12 hours). These training programs also reflect the limited and short-term/seasonal nature of pre-construction activities that occurred in 2019.

Table 7-2: Hours of Training (by Type) Completed

Hours of Training (by Type) Completed			
2019 Training	Inuit	Non-Inuit	Total
Plane Fuel Offload	12	14	26
Fire Response	20	12	32
Aircraft Incident Response	8	12	20
Skid Steer Operation	8	4	12
IT28 Loader	12	6	18
Incinerator	8	8	16
Fuel Station	4	8	12
Boat	12	24	36
Snowmobile	0	5	5
Dangerous Goods	0	12	12
TOTAL	84	105	189

Source: Sabina

Several Terms and Conditions in the Project Certificate request additional information on training programs at the Project. Term and Condition No. 76 requests that Sabina provide information regarding any second language courses offered on-site. This includes: a) description of courses offered;

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. No second language courses have been offered by Sabina on-site to date. Updates on this topic will be provided in future Socio-Economic Monitoring Reports.

Term and Condition No. 83 asks that Sabina communicate and collaborate with the GN and the Nunavut Housing Corporation (NHC) on potential housing initiatives with a view to enhancing employee access to a range of housing options, including homeownership. Initiatives may include the provision of financial literacy, financial planning, and personal budgeting training. As described in the Human Resources Plan (Sabina 2018c), Sabina may arrange for financial management orientation for employees (based on demand). However, no related training programs have been offered by Sabina to date. Updates on this topic will be provided in future Socio-Economic Monitoring Reports.

Term and Condition No. 85 requests that Sabina work with the KIA to establish cross-cultural training initiatives which promote respect and consideration for the importance of Inuit Qaujimajatuqangit (IQ) to the Inuit identity and to make this training available to Project employees and on-site sub-contractors. Sabina has also been requested to actively monitor the implementation of these initiatives, including: a) descriptions of the goals of each program offered; b) language of instruction; c) schedules and location(s) of when each program was offered; d) uptake by employees and/or family members where relevant, noting Inuit and non-Inuit participation rates; and e) completion rates for enrolled participants, noting Inuit and non-Inuit participation rates. As described in the Human Resources Plan (Sabina 2018c), Sabina may provide a cross-cultural program for employees. 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 future Socio-Economic Monitoring Reports.

7.1.3 Inuit Apprenticeships

The number of Inuit apprenticeships provided by Sabina are one indicator of advanced education and training opportunities available at the Project. 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 (as formal apprenticeship opportunities won’t be offered until then). Table 7-3 has been included as a placeholder for future years. Additional analysis will be completed as data become available.

Table 7-3: Inuit Apprenticeships

Inuit Apprenticeships	
Year	Number of Apprentices
Year	–
Total	–

Source: Sabina

7.1.4 Secondary School Graduation Rate

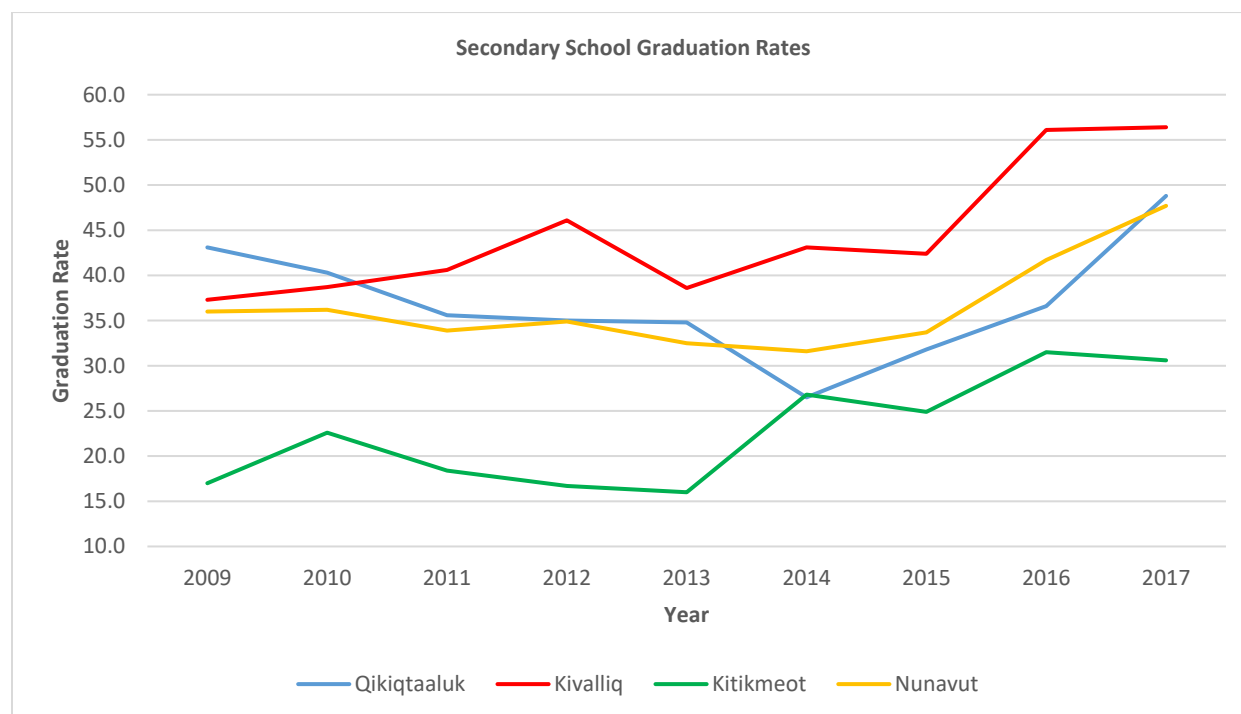
Secondary school graduation rates are a useful indicator of school attendance and success, and can provide insight into potential Project influences in this area. Secondary school graduation rate data are

available from NBS (2019c).⁷ Figure 7-1 displays graduation rates from 2009 to 2017 for the Kitikmeot, Kivalliq, and Qikiqtaaluk Regions and Nunavut. The Kitikmeot Region average graduation rate during this period was 22.7, which was lower than the Nunavut average of 36.5.

The percentage of individuals aged 25 to 64 who have completed secondary school in Nunavut (47.8%) remains well below the Canadian average (86.3%) (Statistics Canada 2017a). O’Gorman and Pandey (2015) have identified some of the barriers to high school completion in Nunavut, which include lack of parental encouragement to attend school and graduate, as well as parents who have not completed high school themselves. Other factors contributing to low high school completion rates among Inuit students include having to learn in a second language, insufficient numbers of Inuit teachers, and curricula that do not include Inuit culture and history (ITK 2018).

These data will continue to serve as baseline information until a Project production decision has been made by Sabina and formal construction activities begin. Additional analysis will be completed as data become available in future years.

Figure 7-1: Secondary School Graduation Rates (2009 to 2017)



Source: NBS (2019c)

7.1.5 Nunavut Arctic College Full-Time Enrollment by Campus

Nunavut Arctic College (NAC) full-time enrollments are a useful indicator of advanced education program usage, and can provide insight into potential Project influences in this area. Full-time

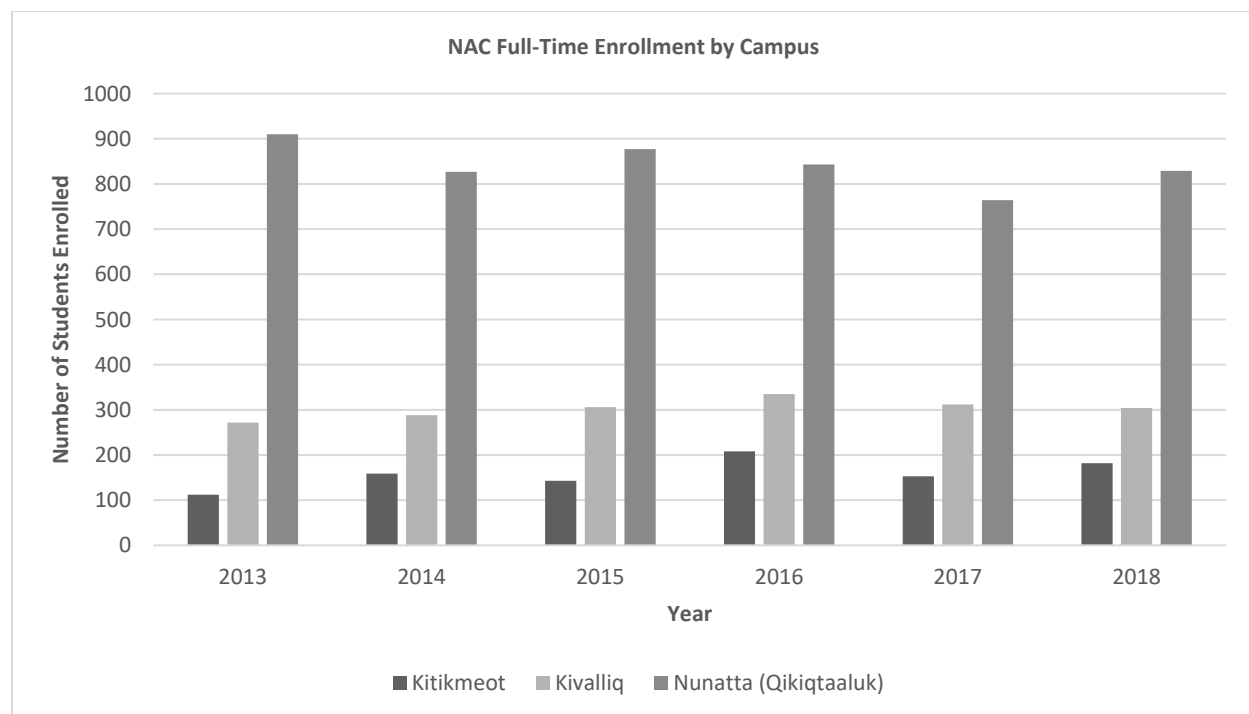
⁷ NBS (2019c) notes the ‘graduation rate’ is calculated by dividing the number of graduates by the average of estimated 17- and 18-year-old populations (the typical ages of graduation). ‘Graduates’ include students who completed secondary school but excludes those who completed equivalency or upgrading programs. Due to the small population of Nunavut, however, NBS (2019c) notes that graduation rate changes from year to year and must be interpreted with caution.

enrollment data are provided in NAC Annual Reports (e.g. NAC 2018) and are summarized for 2013 to 2018 in Table 7-4. Average full-time enrollment in the Kitikmeot Region during this period was 160, which was lower than average full-time enrollments in the Kivalliq Region (303) and Qikiqtaaluk Region (842).

The percentage of individuals aged 25 to 64 who have completed more than a secondary school education in Nunavut (44.4%) remains well below the Canadian average (64.8%) (Statistics Canada 2017b). While post-secondary educational outcomes can be influenced by many factors, including secondary school graduation rates, a recent report by the Office of the Auditor General of Canada (2019) also highlighted the Government of Nunavut Department of Education’s failure to adequately prepare high school students academically for post-secondary education, as well as insufficient outreach from NAC to promote their programs to prospective students.

These data will continue to serve as baseline information until a Project production decision has been made by Sabina and formal construction activities begin. Additional analysis will be completed as data become available in future years.

Figure 7-4: NAC Full-Time Enrollment by Campus (2013 to 2018)



Source: Nunavut Arctic College Annual Reports (e.g. NAC 2018)

7.1.6 Employee Education

Project Certificate Term and Condition No. 75 requests that Sabina monitor employee education utilization rate trends. 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. Following this, an Inuit Employee Survey may be administered to help obtain this information. Tables 7-5 and 7-6 have been included as placeholders for future years. Additional analysis will be completed as data become available.

Table 7-5: Highest Level of Education Obtained (Inuit Employee Survey Results)

Highest Level of Education Obtained (Inuit Employee Survey Results)		
Highest Level of Education	Number of Respondents	Percentage of Respondents
Less than high school	–	–
High school diploma or equivalent	–	–
Apprenticeship or trades certificate or diploma	–	–
College or other non-university certificate or diploma	–	–
University certificate or diploma	–	–
Unknown	–	–
Total	–	–

Source: Sabina

Table 7-6: Utilization of Local, Regional, and Territorial Educational Opportunities by Project Employees (Inuit Employee Survey Results)

Utilization of Local, Regional, and Territorial Educational Opportunities by Project Employees (Inuit Employee Survey Results)		
Education Program	Number of Respondents	Percentage of Respondents
<i>I completed a high school diploma or equivalent (n= N/A)</i>		
Yes	–	–
No	–	–
Unknown	–	–
Yes, in the Kitikmeot Region	–	–
Yes, in the Kivalliq Region or Qikiqtaaluk Region	–	–
Yes, in the Northwest Territories	–	–
Yes, elsewhere	–	–
<i>I completed an apprenticeship or trades certificate or diploma (n= N/A)</i>		
Yes	–	–
No	–	–
Unknown	–	–
Yes, in the Kitikmeot Region	–	–
Yes, in the Kivalliq Region or Qikiqtaaluk Region	–	–
Yes, in the Northwest Territories	–	–
Yes, elsewhere	–	–
<i>I completed a college or other non-university certificate or diploma (n= N/A)</i>		
Yes	–	–
No	–	–
Unknown	–	–
Yes, in the Kitikmeot Region	–	–
Yes, in the Kivalliq Region or Qikiqtaaluk Region	–	–
Yes, in the Northwest Territories	–	–
Yes, elsewhere	–	–
<i>I completed a university certificate or diploma (n= N/A)</i>		
Yes	–	–
No	–	–
Unknown	–	–
Yes, in the Kitikmeot Region	–	–
Yes, in the Kivalliq Region or Qikiqtaaluk Region	–	–
Yes, in the Northwest Territories	–	–
Yes, elsewhere	–	–

Source: Sabina

7.2 EFFECTS AND COMPLIANCE ASSESSMENT

7.2.1 Management and Mitigation Measures

Several management and mitigation measures have been developed by Sabina in relation to the Education and Training VSEC. These are described in the IIBA (KIA and Sabina 2018), Human Resources Plan (Sabina 2018c), Business Development Plan (Sabina 2018d), and Socio-Economic Monitoring Plan (Sabina 2018a) and include:

- Preferential employment opportunities for Inuit
- Preferential contracting opportunities for Inuit businesses
- Training and career development opportunities for Inuit
- Inuit training targets
- Training and Education Fund contributions
- Investments in school-based initiatives (including summer student programs)
- Socio-economic monitoring of education and training indicators

7.2.2 Effects Assessment

There were two residual effects for the Education and Training VSEC assessed in the FEIS. Monitoring results applicable to these are summarized in Table 7-7.

Table 7-7: Effects Assessment for the Education and Training VSEC

Residual Effect	FEIS Conclusion	Monitoring Results
Changes to the Demand for Education and Training	The Project may create increased demand for education and training programs as a result of the provision of employment and contracting opportunities. Overall, increases to the demand for education and training are considered to have a positive residual effect on the Education and Training VSEC.	As the Project has not begun construction, it's too early to assess whether notable changes to the demand for education and training have been realized and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.
Changes to Youth Attitudes and Behaviours Toward Education and Training	The Project has the potential to change youth attitudes toward education and training through the modelling of behavior and changes to the employment status of local residents. Should a notable number of local residents become employed with the Project, youth may experience or witness the connection between education and employment as adults begin to upgrade their skills or participate in training for employment with the Project. The shift in youth attitudes may serve to increase participation in education and interest in school generally. This change in youth attitudes toward education and training is considered a positive residual effect on the Education and Training VSEC.	As the Project has not begun construction, it's too early to assess whether notable changes to youth attitudes and behaviours toward education and training have been realized and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.

7.2.3 Compliance Assessment

There are four Terms and Conditions in the Project Certificate pertaining to the Education and Training VSEC. The status of these are summarized in Table 7-8.

Table 7-8: Terms and Conditions for the Education and Training VSEC

Term and Condition No.	Description	Status
73	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.	Sabina participates in training-related discussions through the KIA's Kitikmeot Stakeholders Working Group and the NWT & Nunavut Chamber of Mines' Education and Mine Training Working Group. Additional work in this area will be described in future Socio-Economic Monitoring Reports. Types of training programs offered by Sabina are discussed in Section 7.1.2 (Hours of Training (by Type) Completed) and Section 7.1.3 (Inuit Apprenticeships) .
74	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.	An initial listing was provided by Sabina to NIRB in November 2018. Updates to this list will be included in future Socio-Economic Monitoring Reports.
75	The Proponent is encouraged to work with the SEMWG and with the 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.	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 this report. Data may be sourced from future Inuit Employee Surveys. A draft Inuit Employee Survey was included in Sabina's 2018 Socio-Economic Monitoring Report (JPCSL 2019), which includes questions on this topic.
76	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.	No second language courses have been offered by Sabina on-site 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) .

8. HEALTH AND COMMUNITY WELL-BEING

8.1 INDICATOR DATA AND ANALYSIS⁸

8.1.1 Utilization Rate of Employee and Family Assistance Program

Data from Sabina's Employee and Family Assistance Program (EFAP) can provide insight into its usage by Project employees. No data on this topic are expected to be provided until after a Project production decision has been made by Sabina and formal construction activities begin. Table 8-1 has been included as a placeholder for future years. Additional analysis will be completed when data are available.

Table 8-1: Number of Times Sabina's EFAP is Accessed Annually

Number of Times Sabina's Employee and Family Assistance Program (EFAP) is Accessed Annually			
Year	Nunavut	Other Locations	Total
Year	–	–	–

Source: Sabina

8.1.2 Number of Impaired Driving Violations

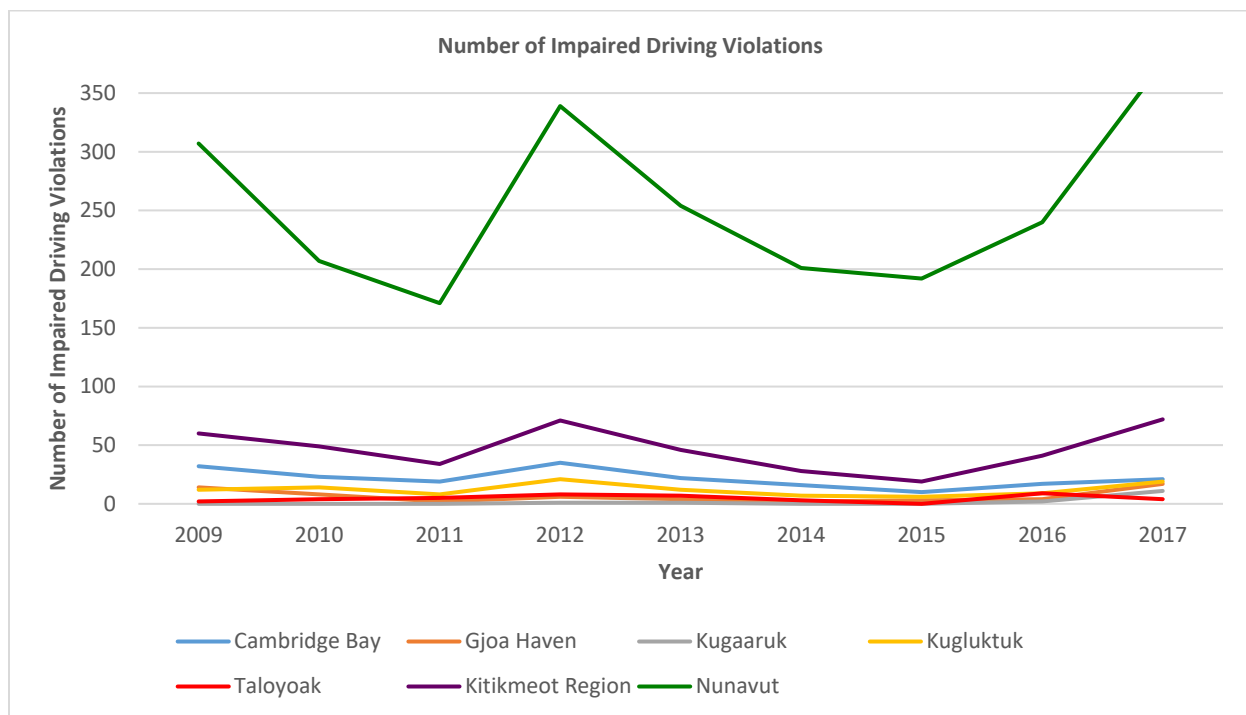
Data on impaired driving violations in the LSA can provide insight into whether rates of substance abuse are changing as a result of the Project. Impaired driving violation data are available from NBS (2018a). Figure 8-1 displays the number of impaired driving violations from 2009 to 2017. The Kitikmeot Region average during this period was 47 violations, while Nunavut had an average of 254 violations. Cambridge Bay had the highest average (22) in the Kitikmeot Region during this period, while Kugaaruk had the lowest (2).

Substance abuse issues remain a significant concern in Nunavut. While these issues can be influenced by many factors, some identified reasons for them in Nunavut include intergenerational trauma associated with forced relocations, loss of cultural tradition and language, the historical impact of residential schools, poor housing conditions, and the disintegration of family structure (NVision Insight Group 2018).

These data will continue to serve as baseline information until a Project production decision has been made by Sabina and formal construction activities begin. Additional analysis will be completed as data become available in future years.

⁸ Additional indicator data relevant to this VSEC (i.e. Project hours worked and hours of training completed) are provided in Section 4 (Employment) and Section 7 (Education and Training).

Figure 8-1: Number of Impaired Driving Violations (2009 to 2017)



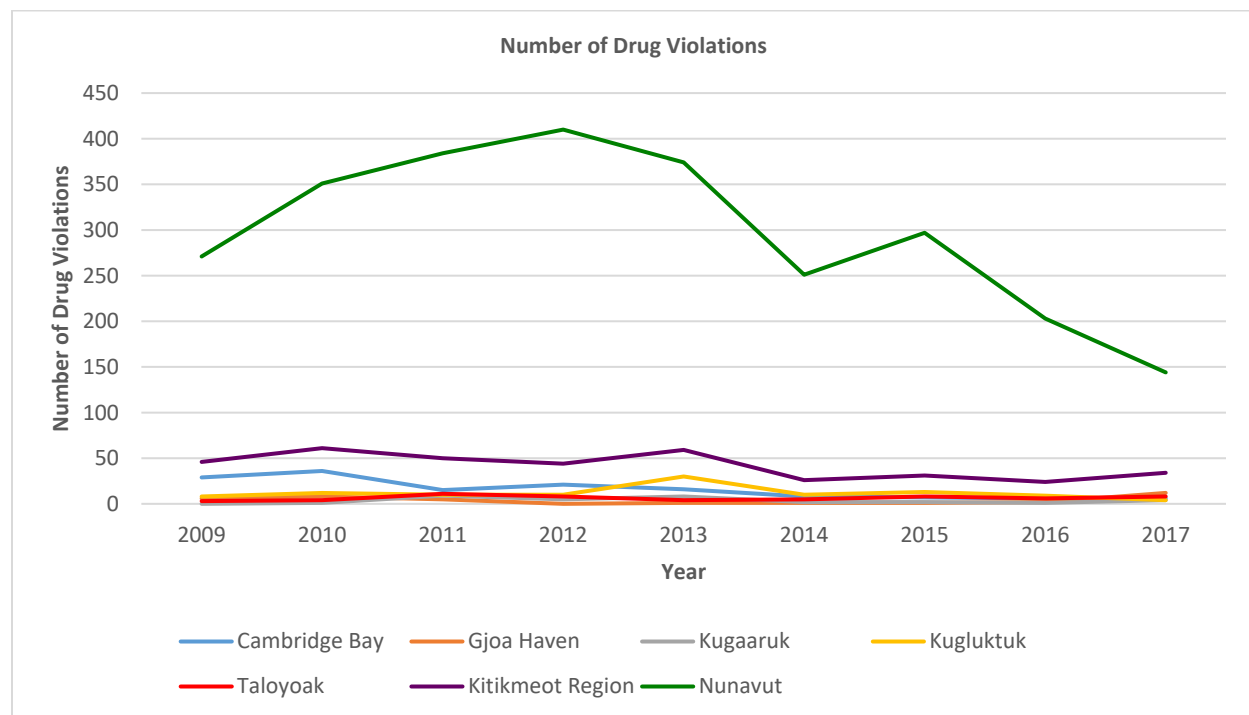
Source: NBS (2018a)

8.1.3 Number of Drug Violations

Data on drug violations in the LSA can provide insight into whether rates of drug abuse are changing as a result of the Project. Drug violation data are available from NBS (2018a). Figure 8-2 displays the number of drug violations from 2009 to 2017. The Kitikmeot Region average during this period was 42 violations, while Nunavut had an average of 298. Cambridge Bay had the highest average (16) in the Kitikmeot Region during this period, while Gjoa Haven and Kugaaruk each had the lowest (4). As previously noted in Section 8.1.2, substance abuse issues remain a significant concern in Nunavut. These issues can be influenced by many factors (e.g. NVision Insight Group 2018).

These data will continue to serve as baseline information until a Project production decision has been made by Sabina and formal construction activities begin. Additional analysis will be completed as data become available in future years.

Figure 8-2: Number of Drug Violations (2009 to 2017)



Source: NBS (2018a)

8.1.4 Crime Rate

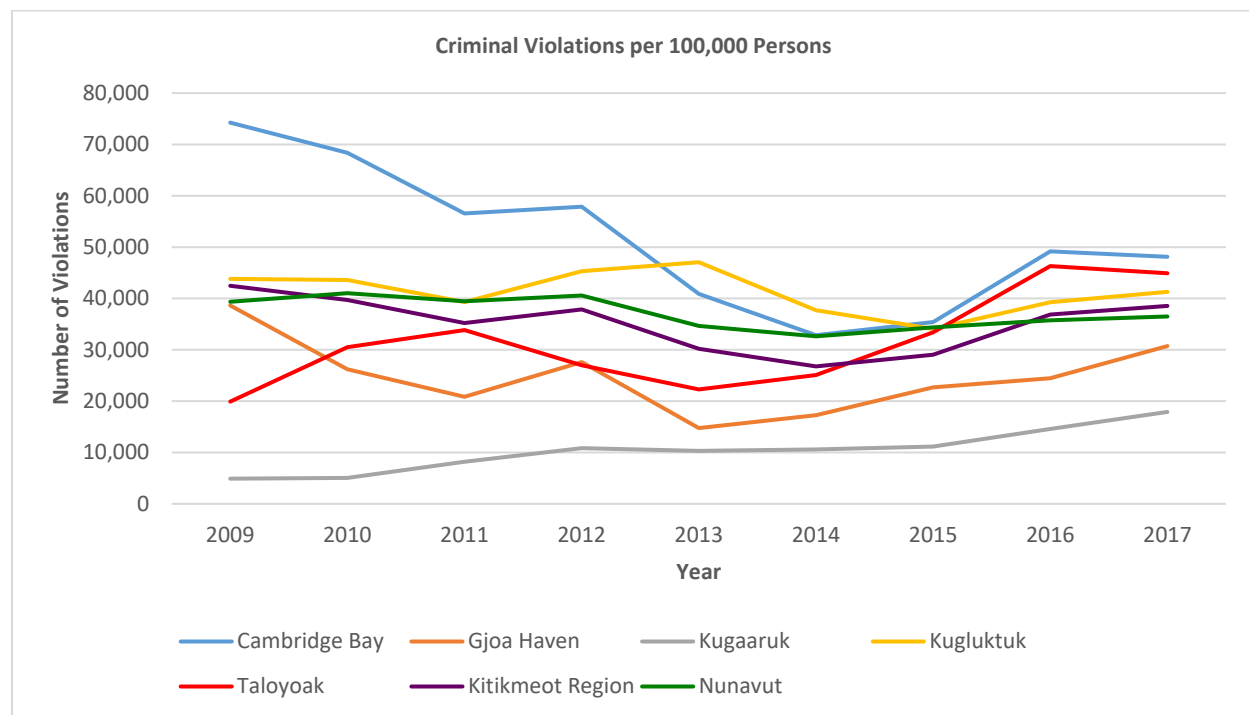
Data on community crime rates can provide an indication of whether the incidence of crime is changing as a result of the Project. Community crime rate data are available from NBS (2018b). Figure 8-3 displays the number of criminal violations per 100,000 persons from 2009 to 2017.⁹ The Kitikmeot Region average during this period was 35,109, which was lower than the Nunavut average of 37,104. Cambridge Bay had the highest average (51,498) in the Kitikmeot Region during this period, while Kugaaruk had the lowest (10,398).

Crime issues are more prevalent in Nunavut than many other Canadian jurisdictions (Moreau 2019). While these issues can be influenced by many factors, high rates of substance abuse, higher proportions of lone parent households, lack of education, and overcrowded homes have all been linked to higher crime rates (NVision Insight Group 2018, Perreault 2019).

These data will continue to serve as baseline information until a Project production decision has been made by Sabina and formal construction activities begin. Additional analysis will be completed as data become available in future years.

⁹ NBS (2018b) notes these data include criminal code violations (including traffic) and total federal statutes. These data also only include 'actual violations' (i.e. unfounded violations are subtracted from the number of reported violations to produce the number of actual violations).

Figure 8-3: Number of Criminal Violations per 100,000 Persons (2009 to 2017)



Source: NBS (2018b)

8.1.5 Marital Status of Individuals 15 Years and Over

Marital status data can provide insight into potential changes to family/household structure induced by the Project. Marital status data are available through the Federal Census (see Table 8-2). Between 2011 and 2016, for example, the percentage of individuals in the Kitikmeot Region who were married or living common law increased (from 54.3% to 54.4%), while those who were separated or divorced decreased (from 3.3% to 2.9%). In Nunavut, the percentage of individuals who were married or living common law decreased (from 53.4% to 53.2%), while those who were separated or divorced remained the same (at 3.5%).

Separation and divorce rates in Nunavut remain lower than Canadian averages, which may be because the rate of couples living common-law in Nunavut is more than double the rate in the rest of Canada (Statistics Canada 2017b). Many of these couples do not consider themselves legally bound, and therefore do not seek legal proceedings when they wish to end the relationship. Low separation and divorce rates may also be due to the housing shortage that exists in Nunavut, in that a spouse wishing to leave the marriage may have no place else to go (Government of Canada 2015).

These data will continue to serve as baseline information until a Project production decision has been made by Sabina and formal construction activities begin. Additional analysis will be completed as data become available in future years.

Table 8-2: Marital Status of Individuals 15 Years and Over (2011 and 2016)

Marital Status of Individuals 15 Years and Over				
Location	2011		2016	
	% Married or Living with a Common-Law Partner	% Separated or Divorced	% Married or Living with a Common-Law Partner	% Separated or Divorced
Kitikmeot Region	54.3%	3.3%	54.4%	2.9%
Nunavut	53.4%	3.5%	53.2%	3.5%
Canada	57.7%	8.6%	57.6%	8.6%

Source: Statistics Canada (2012a, b, c, d, e, f); Statistics Canada (2017b, c, d, e, f, g)

8.1.6 Employee Changes of Address, Housing Status, and Migration Intentions

Project Certificate Term and Condition No. 84 requests that Sabina design and implement a voluntary housing survey to be offered to its Nunavummiut employees. 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. Following this, an Inuit Employee Survey may be administered to help obtain this information. Tables 8-3 to 8-5 have been included as placeholders for future years. Additional analysis will be completed as data become available in future years.

Table 8-3: Changes in Inuit Employee Residence and Community (Inuit Employee Survey Results)

Changes in Inuit Employee Residence and Community (Inuit Employee Survey Results)		
Type of Residence Change	Number of Respondents	Percentage of Respondents
<i>All survey respondents (n= N/A)</i>		
Residence changed in the past 12 months, within existing community	–	–
Residence changed in the past 12 months, moved to new community	–	–
Residence did not change in the past 12 months	–	–
Unknown	–	–
Total	–	–
<i>Residence changed in the past 12 months, moved to new community (n= N/A)</i>		
Moved from Kitikmeot Region to outside of Kitikmeot Region	–	–
Moved from outside of Kitikmeot Region to Kitikmeot Region	–	–
Moved within the Kitikmeot Region	–	–
Other	–	–
Unknown	–	–
Total	–	–

Source: Sabina

Table 8-4: Current Inuit Employee Housing Status (Inuit Employee Survey Results)

Current Inuit Employee Housing Status (Inuit Employee Survey Results)		
Current Housing Status	Number of Respondents	Percentage of Respondents
<i>All survey respondents (n= N/A)</i>		
Privately owned – Owned by you	–	–
Privately owned – Owned by another individual	–	–
Renting from a private company	–	–
Public housing	–	–
Government of Nunavut staff housing	–	–
Other staff housing	–	–
Other	–	–
Unknown	–	–
Total	–	–

Source: Sabina

Table 8-5: Inuit Employee Migration Intentions (Inuit Employee Survey Results)

Inuit Employee Migration Intentions (Inuit Employee Survey Results)		
Migration Intentions	Number of Respondents	Percentage of Respondents
<i>All survey respondents (n= N/A)</i>		
Plan to move residences in the next 12 months, within existing community	–	–
Plan to move residences in the next 12 months, to a new community	–	–
Do not plan to move residences in the next 12 months	–	–
Unknown	–	–
Total	–	–
<i>Plan to move residences in the next 12 months, to a new community (n= N/A)</i>		
Plan to move from Kitikmeot Region to outside of Kitikmeot Region	–	–
Plan to move from outside of Kitikmeot Region to Kitikmeot Region	–	–
Plan to move within Kitikmeot Region	–	–
Other	–	–
Unknown	–	–
Total	–	–

Source: Sabina

8.1.7 Number of Health Centre Visits Per Capita

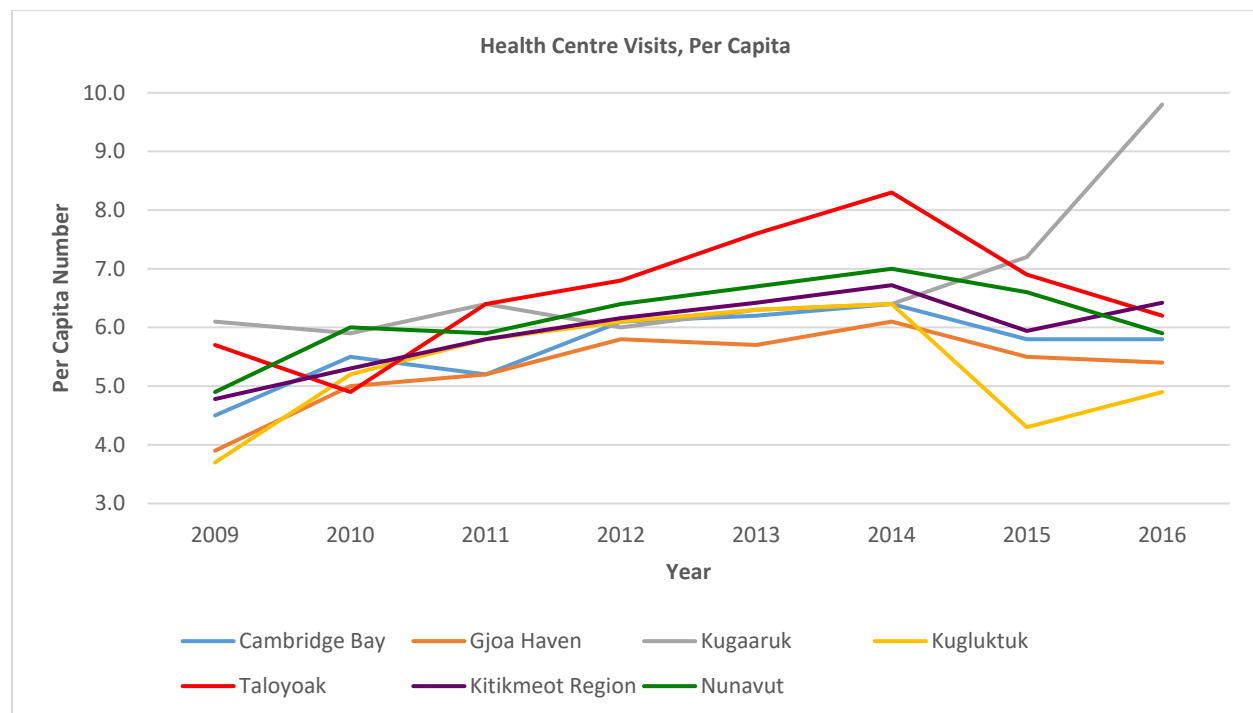
Community health centre visit data can provide insight into potential changes to demand experienced by local health care services as a result of the Project. These data are available from NBS (2018c). Figure 8-4 displays the number of health centre visits per capita from 2009 to 2016. The Kitikmeot Region average during this period was 5.9 visits per capita, which was lower than the Nunavut average of 6.2. Kugaaruk had the highest average (6.8) in the Kitikmeot Region during this period, while Gjoa Haven and Kugluktuk had the lowest (5.3).

Compared to the rest of Canada, Inuit face challenges in terms of physical and mental health and well-being, including a shorter life expectancy, higher infant mortality rates, the highest suicide rates, and higher rates of infectious diseases (ITK 2014; Statistics Canada 2014). While health outcomes can be influenced by many factors, ITK (2014: 7) notes “this health gap in many respects is a symptom of poor

socio-economic conditions in Inuit communities which are characterized by high poverty rates, low levels of education, limited employment opportunities, and inadequate housing conditions.”¹⁰

These data will continue to serve as baseline information until a Project production decision has been made by Sabina and formal construction activities begin. Additional analysis will be completed as data become available in future years.

Figure 8-4: Number of Health Centre Visits Per Capita (2009 to 2016)



Source: NBS (2018c)

8.1.8 Number of Times GN Emergency Health Services Required

Sabina’s use of GN emergency health services provides an indication of Project demands placed on community and territorial health services. Zero uses of GN medevac services or community emergency health services were required by Sabina in 2019 (Table 8-6). This indicator includes emergency health services required by any Sabina employee or contractor at Project sites.

¹⁰ More broadly, ITK (2014) identifies the following eleven factors as key social determinants of Inuit health: quality of early childhood development, culture and language, livelihoods, income distribution, housing, personal safety and security, education, food security, availability of health services, mental wellness, and the environment.

Table 8-6: Number of Times GN Emergency Health Services Required

Number of Times GN Emergency Health Services Required	
Year	Number of Times GN Emergency Health Services Required
2018	0
2019	0
Total	0

Source: Sabina

8.1.9 Lost Time Incidents

Lost time incidents are a useful indicator of overall health and safety at a work site. Zero lost time incidents occurred at Project sites in 2019, resulting in zero lost time days (Table 8-7). This indicator includes lost time incidents for any Sabina employee or contractor at Project sites.

Table 8-7: Lost Time Incidents

Lost Time Incidents		
Year	Number of Incidents	Total Lost Time (Days)
2018	1	5
2019	0	0
Total	1	5

Source: Sabina

8.2 EFFECTS AND COMPLIANCE ASSESSMENT

8.2.1 Management and Mitigation Measures

Several management and mitigation measures have been developed by Sabina in relation to the Health and Community Well-Being VSEC. These are described in the IIBA (KIA and Sabina 2018), Human Resources Plan (Sabina 2018c), and Socio-Economic Monitoring Plan (Sabina 2018a) and include:

- Employee and Family Assistance Program (EFAP)
- Inuit Employment and Training Coordinator
- Workplace preparedness orientation
- Environmental protection and health and safety orientation
- Cross-cultural orientation
- Provision of country food, country food kitchens, and cultural activities at the Project
- On-site access to communications facilities
- Preferential employment opportunities for Inuit
- Training and career development opportunities for Inuit
- Socio-economic monitoring of health and community well-being indicators

8.2.2 Effects Assessment

There were three residual effects for the Health and Community Well-Being VSEC assessed in the FEIS. Monitoring results applicable to these are summarized in Table 8-8.

Table 8-8: Effects Assessment for the Health and Community Well-Being VSEC

Residual Effect	FEIS Conclusion	Monitoring Results
Changes to Life Skills of Individuals	The Project is anticipated to increase the life skills of individuals who obtain Project-related employment. Engagement in economic productive work, the management of finances, and responsibility associated with employment are expected to assist with or support decision making and increase life skills. Increased life skills are considered positive and are anticipated to have a positive residual effect on the Health and Community Well-being VSEC.	As the Project has not begun construction, it's too early to assess whether notable changes to life skills of individuals have been realized and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.
Changes to Individual and Family Spending	The Project is anticipated to cause changes to individual and family spending as a result of employment and increased incomes. This effect may be either positive (e.g. increased spending on equipment for harvesting or groceries, reducing higher than average levels of food insecurity, or increased savings for larger purchases, old age, or children's education) or negative (e.g. spending on drugs and alcohol and engaging in negative social behaviors) and is dependent on choices made by individuals. Both positive and negative changes to individual and family spending have the potential to have a moderate magnitude, that is, to affect a number of households. However, the magnitude of this effect is dependent on the number of Kitikmeot residents that obtain Project employment. Furthermore, the few individuals experiencing a negative effect over a longer period results in a low magnitude rating. This effect is determined to be Not Significant based on the reversible nature of the effect, and the short to medium term duration. The social extent of this effect is limited.	As the Project has not begun construction, it's too early to assess whether notable changes to individual and family spending have occurred and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.
Changes to Family/Household Structure	The Project is anticipated to cause changes to family and household structure as a result of Project employment. Most notably, the periods away from the home while on shift and the social stressors that this can bring to family relationships due to the separation (and periodic re-introduction) can lead to or exacerbate relationship and family issues. The direction of this effect is expected to be negative as a result of the heightened importance of and value on the family unit in Inuit culture. The magnitude of this effect is considered low, as only a small number of households will be engaged in employment opportunities directly with the Project. This effect is determined to be Not Significant because the magnitude is low and the effect is reversible. The determination is further supported as the effect does not extend beyond the life of the Project and is only applicable for	As the Project has not begun construction, it's too early to assess whether notable changes to family/household structure have occurred and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.

Residual Effect	FEIS Conclusion	Monitoring Results
	individuals who receive the corresponding benefit of employment.	

8.2.3 Compliance Assessment

There are three Terms and Conditions in the Project Certificate pertaining to the Health and Community Well-Being VSEC. The status of these are summarized in Table 8-9.

Table 8-9: Terms and Conditions for the Health and Community Well-Being VSEC

Term and Condition No.	Description	Status
83	The Proponent is strongly encouraged to communicate and collaborate with the GN and the NHC 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.	Sabina may provide financial management orientation for employees, as described in its Human Resources Plan (Sabina 2018c). 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.
84	The Proponent is strongly encouraged to work with the KSEMC, the NHC, and the GN to design and implement a voluntary housing survey to be offered to its Nunavummiut employees.	Information on this topic will be provided in future Socio-Economic Monitoring Reports, for example if Inuit Employee Survey data become available, in Section 8.1.6 (Employee Changes of Address, Housing Status, and Migration Intentions) . A draft Inuit Employee Survey was included in Sabina's 2018 Socio-Economic Monitoring Report (JPCSL 2019), which includes questions on this topic. Sabina continues to welcome feedback on this survey from the KSEMC, NHC, and GN.
85	The Proponent is encouraged to work with the KIA 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: a. Descriptions of the goals of each program offered; b. Language of instruction; c. Schedules and location(s) of when each program was offered; d. Uptake by employees and/or family members where relevant, noting Inuit and non-Inuit participation rates; and e. Completion rates for enrolled participants, noting Inuit and non-Inuit participation rates.	Sabina may provide cross-cultural orientation for employees, as described in its Human Resources Plan (Sabina 2018c). Updates on this topic will be provided in Section 7.1.2 (Hours of Training (by Type) Completed) of future Socio-Economic Monitoring Reports.

9. NON-TRADITIONAL LAND AND RESOURCE USE

9.1 INDICATOR DATA AND ANALYSIS

9.1.1 Number of Formal Grievances/Complaints Filed Pertaining to Non-Traditional Land and Resource Use

The number of grievances/complaints filed pertaining to non-traditional land and resource use can indicate whether Project-induced changes in this area are occurring. 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 (as a grievance/complaints process has not yet been finalized). Table 9-1 has been included as a placeholder for future years. Additional analysis will be completed as data become available.

Table 9-1: Number of Formal Grievances/Complaints Filed Pertaining to Non-Traditional Land and Resource Use

Number of Formal Grievances/Complaints Filed Pertaining to Non-Traditional Land and Resource Use	
Year	Number of Formal Grievances/Complaints
Year	–
Total	–

Source: Sabina

In addition, Project Certificate Term and Condition No. 81 requests that Sabina 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. Sabina has developed a consultation protocol for these businesses (Appendix C). Updates on this topic will be provided in future Socio-Economic Monitoring Reports.

9.2 EFFECTS AND COMPLIANCE ASSESSMENT

9.2.1 Management and Mitigation Measures

Several management and mitigation measures have been developed by Sabina in relation to the Non-Traditional Land and Resource Use VSEC. These include:

- Grievance/complaints process to address issues related to non-traditional land and resource use (to be developed)
- Noise Abatement Mitigation and Monitoring Program, within the Wildlife Mitigation and Monitoring Plan
- Air Quality Monitoring and Management Plan
- Monitoring of air quality, dust, and other emissions for wildlife and other receptors
- Socio-economic monitoring of a non-traditional land and resource use indicator

9.2.2 Effects Assessment

There was one residual effect for the Non-Traditional Land and Resource Use VSEC assessed in the FEIS. Monitoring results applicable to this are summarized in Table 9-2.

Table 9-2: Effects Assessment for the Non-Traditional Land and Resource Use VSEC

Residual Effect	FEIS Conclusion	Monitoring Results
Changes to the Experience of the Natural Environment	There is potential for Project activities at the MLA to affect the experience of the natural environment for non-traditional land users due to their use of the Fishing Creek area; no residual effects are anticipated at the Goose Property. Non-traditional land users that are expected to experience an effect include those associated with the Bathurst Inlet Lodge. This effect is anticipated to be negative, as the addition of industrial development to a wilderness area generally degrades the wilderness experience. The magnitude of this effect is expected to be moderate as there would be a change from baseline conditions. The effect is considered Not Significant, as the effect is sporadic and reversible.	As the Project has not begun construction, it's too early to assess whether notable changes to the experience of the natural environment have occurred and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.

9.2.3 Compliance Assessment

There is one Term and Condition in the Project Certificate pertaining to the Non-Traditional Land and Resource Use VSEC. The status of this is summarized in Table 9-3.

Table 9-3: Terms and Conditions for the Non-Traditional Land and Resource Use VSEC

Term and Condition No.	Description	Status
81	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.	Appendix C includes an 'Outfitting/Guiding Business Consultation Protocol'. Sabina welcomes feedback on this protocol from Project stakeholders. Updates on this topic will be provided in Sabina's Annual Report to NIRB and/or future Socio-Economic Monitoring Reports. Section 9.2.1 (Number of Formal Grievances / Complaints Filed Pertaining to Non-Traditional Land and Resource Use) of future Socio-Economic Monitoring Reports may also contain relevant information.

10. SUBSISTENCE ECONOMY AND LAND USE

10.1 INDICATOR DATA AND ANALYSIS

10.1.1 Number of Land Use Visitor Person-Days at Project Sites

The number of recorded land use visitor 'person-days' at Project sites can provide an indication of how often the Project area is accessed for land use activities. Because groups of individuals may travel together and/or utilize Project sites over multiple days, person-days are useful for calculating the extent of site visitations in a year (i.e. one person-day is equal to one person visiting a site during one day, while ten person-days could equal one person visiting a site during ten days or five people visiting a site during two days). Individuals must have travelled to or through Project sites on their own accord (e.g. via snow machine, boat, or ATV) to be counted. Sabina maintains a visitor log to track land use parties that pass through or use Project areas.

A total of 46 land use visitor person-days were recorded at Project sites in 2019, all of which occurred at the MLA. These included informal visits, visits to pick up freight/fuel and, in one instance, a five day visit by a non-Inuit expeditioner travelling through the area. Harvesting does not appear to have been a primary motive for the visits recorded to the MLA in both 2018 and 2019.

Table 10-1: Number of Recorded Land Use Visitor Person-Days at Project Sites

Number of Recorded Land Use Visitor Person-Days at Project Sites			
Year	Goose Camp	MLA	Total
2018	0	36	36
2019	0	46	46
Total	0	82	82

Source: Sabina

Notes: This table only includes recorded land use visitors at selected Project sites and while camps were operational; as such, it may underestimate the total number of land users accessing all Project sites.

10.1.2 Number of Wildlife Compensation Payments Made

Wildlife compensation payments made by Sabina to the KIA can provide insight into land use, wildlife, and harvesting issues which may be resulting from the Project.¹¹ One wildlife compensation payment was made in 2019 (Table 10-2). This payment was made following a grizzly bear being killed by a Sabina bear monitor after coming too close to a field crew.

Table 10-2: Number of Wildlife Compensation Payments Made

Number of Wildlife Compensation Payments Made	
Year	Number of Payments
2019	1
Total	1

Source: Sabina

¹¹ A process to address compensation for the disruption of wildlife by the Project has been established under the IIBA.

10.1.3 Number of Formal Grievances/Complaints Filed Pertaining to the Subsistence Economy and Land Use

The number of grievances/complaints filed pertaining to the subsistence economy and land use can indicate whether Project-induced changes in this area are occurring. 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 (as a grievance/complaints process has not yet been finalized). Table 10-3 has been included as a placeholder for future years. Additional analysis will be completed as data become available.

Table 10-3: Number of Formal Grievances/Complaints Filed Pertaining to the Subsistence Economy and Land Use

Number of Formal Grievances/Complaints Filed Pertaining to the Subsistence Economy and Land Use	
Year	Number of Formal Grievances/Complaints
Year	–
Total	–

Source: Sabina

10.1.4 Number of Times Public Use of the Project's Winter Ice Road Reported

Project Certificate Term and Condition No. 80 requests that Sabina monitor public use of the Project's Winter Ice Road (WIR). 2019 was the first year the WIR became operational (operating from April-May). One instance of public use of the WIR was recorded in 2019 (Table 10-4). This use was by a non-Inuit expeditioner travelling through the area.

Table 10-4: Number of Times Public Use of the Project's Winter Ice Road Reported

Number of Times Public Use of the Project's Winter Ice Road Reported	
Year	Number of Times Public Use Reported
2019	1
Total	1

Source: Sabina

10.2 EFFECTS AND COMPLIANCE ASSESSMENT

10.2.1 Management and Mitigation Measures

Several management and mitigation measures have been developed by Sabina in relation to the Subsistence Economy and Land Use VSEC. These include:

- Grievance/complaints process to address issues related to the subsistence economy and land use (to be developed)
- Wildlife compensation process
- Project design measures, to reduce potential effects (e.g. open water shipping only, no hunting/fishing policy at Project sites)

- Project design measures, to enhance benefits (e.g. fly-in/fly-out operation coupled with two week on/two week off work rotation schedule allows for continued participation in land use activities; income benefits may enhance the ability to participate in land use activities)
- Wildlife Mitigation and Monitoring Plan
- Noise Abatement Mitigation and Monitoring Program
- Air Quality Monitoring and Management Plan
- Monitoring of air quality, dust, and other emissions for wildlife and other receptors
- Socio-economic monitoring of subsistence economy and land use indicators

10.2.2 Effects Assessment

There were three residual effects for the Subsistence Economy and Land Use VSEC assessed in the FEIS. Monitoring results applicable to these are summarized in Table 10-5.

Table 10-5: Effects Assessment for the Subsistence Economy and Land Use VSEC

Residual Effect	FEIS Conclusion	Monitoring Results
Changes in Access to Land and Resources	Land within the Goose Property and the MLA, and along all winter roads associated with the Project will no longer be available for use by subsistence harvesters while in use by the Project. This negative effect is predicted to be moderate in magnitude as it represents a change from baseline conditions. This effect is assessed as Not Significant, as the effect will be limited to areas within the land use LSA and affect a relatively small number of hunters.	As the Project has not begun construction, it's too early to assess whether notable changes in access to land and resources have occurred and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.
Changes to the Experience of the Natural Environment	This effect is predicted to be negative, as the addition of industrial development to a wilderness area is expected to alter the wilderness experience for hunters. The magnitude of this effect is predicted to be moderate as there will be a change from baseline conditions within the land use LSA. This effect is considered Not Significant for all Project phases, as the effect will be largely limited to within the land use LSA and affect a relatively small number of hunters.	As the Project has not begun construction, it's too early to assess whether notable changes to the experience of the natural environment have occurred and if mitigation measures are functioning as anticipated. Additional conclusions will be drawn in future monitoring reports.
Changes to the Abundance and Distribution of Resources	This effect is predicted to be negative due to the loss of habitat and likely relocation of resources (e.g. wildlife, birds) to areas outside the land use LSA. The change in wildlife resource distribution and abundance is expected to cause a change in harvesting patterns for subsistence harvesters active within the LSA but is not expected to reduce the overall levels of harvesting that occur in the RSA and the broader region. The magnitude is anticipated to be moderate as there will be a change from baseline conditions. This effect is considered Not Significant for all Project phases, as the effect is expected to be mainly restricted to within the land use LSA and affect a relatively small number of hunters.	Potential effects will be tracked through Sabina's terrestrial, freshwater, and marine environment monitoring programs.

10.2.3 Compliance Assessment

There are three Terms and Conditions in the Project Certificate pertaining to the Subsistence Economy and Land Use VSEC. The status of these are summarized in Table 10-6.

Table 10-6: Terms and Conditions for the Subsistence Economy and Land Use VSEC

Term and Condition No.	Description	Status
78	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 KIA and the KSEMC to report on the collection and integration of Inuit Qaujimaningit and Traditional Knowledge through its monitoring programs for the Project.	Section 1.3 (Use of Community Perspectives and Traditional Knowledge) addresses this topic for socio-economic monitoring. Efforts related to the monitoring of other VECs/VSECs are addressed through their respective monitoring programs and/or Sabina's Annual Report to NIRB. Appendix B includes 'Guidance for Incorporating Community Perspectives and Traditional Knowledge in the Back River Project's Monitoring Programs' . Sabina welcomes feedback on this guidance document from the KIA, KSEMC, and other stakeholders.
79	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 IIBA with the KIA, once established, the Proponent shall provide the NIRB 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.	This topic is addressed in Sabina's Annual Report to NIRB. The IEAC will be established in accordance with requirements described in the IIBA (KIA and Sabina 2018).
80	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.	Section 10.1.4 (Number of Times Public Use of the Project's Winter Ice Road Reported) includes monitoring data on this topic. Results will be assessed on an annual basis.

11. CONCLUDING REMARKS

11.1 SUMMARY

This report has presented data for several topics identified in the Project's Socio-Economic Monitoring Plan (Sabina 2018a). As a Project production decision was not made by Sabina in 2019 and formal construction activities did not begin, some Project-specific data are currently limited or unavailable. Other, non-Project (e.g. government sourced) data will also continue to serve as baseline information until Project construction commences. Additional analysis will be completed as data become available in future years.

Annual reporting helps accomplish the objectives of the monitoring program identified in Section 1.4. Namely, Sections 3 to 10 of this report include information to help verify the accuracy of key FEIS predictions over time, gauge the efficacy of mitigation measures, and assist in the identification of unanticipated effects (Objective 1). Information presented in these sections also provides a basis to support adaptive management, discussed further below (Objective 2). Likewise, Section 1.3 describes how community perspectives and TK continue to inform the socio-economic monitoring program (Objective 3).

11.2 ADAPTIVE MANAGEMENT

Sabina has committed to use adaptive management as a tool for improving the Project's socio-economic performance where necessary. If socio-economic issues are identified through monitoring (e.g. observed results differ from those originally predicted, unanticipated effects are uncovered, mitigation measures are not functioning as anticipated, or where non-compliance and/or indicator threshold issues are identified), an evaluation of existing management and mitigation measures may be conducted, and appropriate adjustments may be identified. Relevant findings will be provided in future monitoring reports. Likewise, Sabina may consult with appropriate stakeholders (e.g. SEMWG) on these topics so their feedback can be taken into consideration.

Sabina has also committed to use adaptive management as a tool for improving the performance of its Socio-Economic Monitoring Plan (Sabina 2018a). Semi-regular evaluations of the Project's monitoring program will be conducted by Sabina to assess the adequacy of its design and content (including indicators and methods used). Ongoing engagement with appropriate monitoring stakeholders (e.g. SEMWG) is also anticipated to occur so their feedback on potential monitoring program improvements can be taken into consideration. The Socio-Economic Monitoring Plan may be updated or adapted based on the above. Major changes to the Plan will be described in future monitoring reports.

Additional monitoring will be required before any long-term conclusions on the Project can be drawn. No need has been identified to update any FEIS predictions or to modify Sabina's existing management approach at this time.

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APPENDIX A: 2019 KSEMC & SEMWG MEETING MINUTES



Department of Economic Development & Transportation
Pivalliyuliyikkut Ingilrayuliyitkullu
Ministère du Développement économique et des Transports



Department of Economic Development & Transportation
Pivalliyuliyikkut Ingilrayuliyitkullu
Ministère du Développement économique et des Transports

The meeting was strongly focused on community, industry, and government discussion about socio-economic impacts and what the Kitikmeot would like to see moving forward. Committee members emphasized the need for local training opportunities for project-specific skills, encouraging youth to continue their education, and financial literacy training for mine employees. It was suggested that the SEMC may benefit from participation from the Department of Education, Nunavut Arctic College, and local youth in next year's meeting.



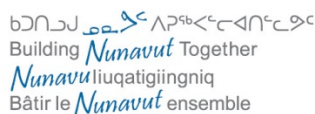
Ministère du Développement économique et des Transports

Arctic Islands Lodge, Cambridge Bay

Angela Gerbrandt – EDO for **Cambridge Bay**

Opening Prayer – Harry Maksagak

1867-975-7833
etaylor@gov.nu.ca
www.nunavutsemc.com



Ministère du Développement économique et des Transports



Ministère du Développement économique et des Transports

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Pivalliyuliyikkut Ingilrayuliyitkullu
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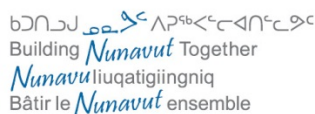


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Ministère du Développement économique et des Transports

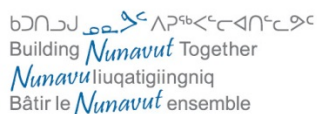
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End of Kitikmeot Socio-Economic Monitoring Committee meeting



Sabina Socio-Economic Monitoring Working Group (SEMWG) Meeting

Cambridge Bay April 11, 2019

Attendance: Erika Zell, Emily Taylor, Tracy Starnes

TS– Currently there is no deadline for submission of the Socio-Economic Monitoring Report. I will ask Merle Keefe (Environmental Permitting Manager) for more details. Sabina welcomes feedback from the Working Group feedback on the report. TK Guidelines are being drafted by Sabina, and will be a focus for this year to incorporate into the report.

TS - Annual report, the Socio-Economic Monitoring Report is attached as appendix. Each term and condition has its own page with brief results focus, and reference to expanded explanation in Socio-Economic Monitoring Report.

EZ - What have you reported on so far?

TS - This year we focused on putting systems in place to check accuracy of numbers, hours worked, gender etc.

EZ - For compliance monitoring and effects monitoring, look at annual report breakdown. Use Socio-Economic Monitoring Report narrative.

TS - Digital copies can be sent to SEMWG members.

EZ - Can the employee survey be included in the hiring process?

TS – We can look into this. We don't have an HR department yet, but when they are hired this is something we can ask them about.

EZ - Are there housing questions on the survey? Has NHC been consulted on it?

TS - The draft survey has not been shared with anyone to my knowledge.

TS - Looking at tracking Sabina medical services used by residents would be interesting. This was an unexpected effect of the project.



**APPENDIX B: GUIDANCE FOR INCORPORATING COMMUNITY PERSPECTIVES AND TRADITIONAL
KNOWLEDGE IN THE BACK RIVER PROJECT'S MONITORING PROGRAMS**

January 2020

Guidance for Incorporating Community Perspectives and Traditional Knowledge in the Back River Project's Monitoring Programs

1. PURPOSE

This document provides guidance on how Sabina Gold & Silver Corp. (Sabina) will incorporate community perspectives and Traditional Knowledge (TK) in the Back River Project's (Project) monitoring programs. This guidance helps address related Terms and Conditions in the Nunavut Impact Review Board's (NIRB) Project Certificate No. 007. For example, Term and Condition No. 78 outlines the anticipated scope of monitoring activities in this area:

Project Certificate Term and Condition No. 78

Objective:

To ensure monitoring efforts are informed by and reflect Inuit Qaujimaningit and local community knowledge.

Term or Condition:

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 Requirements:

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.

Other Project Certificate Terms and Conditions related to the use of community perspectives and TK in Project monitoring/management programs include:

- Term and Condition No. 15 (Terrestrial Environment – Progressive Reclamation Plan)
- Term and Condition No. 37 (Wildlife and Wildlife Habitat – Wildlife Mitigation and Monitoring Plan)
- Term and Condition No. 49 (Wildlife and Wildlife Habitat – Annual Reporting to the NIRB)
- Term and Condition No. 51 (Wildlife and Wildlife Habitat – Caribou Technical Advisory Group)

- Term and Condition No. 53 (Birds and Bird Habitat – Mitigation, Monitoring, and Adaptive Management for Birds and Bird Habitat)
- Term and Condition No. 66 (Economic Development and Opportunities – Socio-Economic Monitoring and the Kitikmeot Socio-Economic Monitoring Committee)
- Term and Condition No. 68 (Economic Development and Opportunities – Socio-Economic Monitoring)
- Term and Condition No. 79 (Traditional Activity and Knowledge – Inuit Environmental Advisory Committee)

2. DEFINITIONS

NIRB (2018) has provided several definitions of relevance to this guidance document:

Traditional Knowledge – *As defined under the NuPPAA to mean the accumulated body of knowledge, observations and understandings about the environment, and about the relationship of living beings with one another and with the environment, that is rooted in the traditional way of life of Inuit of the designated area.*

Inuit Qaujimaningit – *The term Inuit Qaujimaningit is meant to encompass Inuit traditional knowledge (and variations thereof or Inuit Qaujimajatuqangit), local and community-based knowledge, as well as Inuit epistemology as it relates to Inuit Societal Values and Inuit Knowledge (both traditional and contemporary). Inuit Qaujimaningit is rooted in the daily life of Inuit people and represents experience acquired over thousands of years of direct human contact with the environment.*

Inuit Qaujimajatuqangit – *Guiding principles of Inuit social values including: respecting other[s], relationships, and caring for people; development of skills through practice, effort and action; working together for a common cause; fostering good spirit by being open, welcoming, and inclusive; serving and providing for family and/or community; decision making through discussion and consensus; being innovative and resourceful; and respect and care for the land, animals and the environment. Inuit Qaujimajatuqangit refers to traditional values, beliefs, principles and experience regarding the environment.*

Sabina acknowledges the different definitions of Traditional Knowledge, Inuit Qaujimaningit, and Inuit Qaujimajatuqangit that exist. While ‘Traditional Knowledge’ is the term used by Sabina in this guidance document, it is typically used in a broad and inclusive manner akin to the NIRB’s definition of Inuit Qaujimaningit. Other terms may be used by Sabina in the future where appropriate.

3. POTENTIAL SOURCES OF COMMUNITY PERSPECTIVES AND TK

Potential sources of community perspectives and TK relevant to Project monitoring activities may include:

- Sabina’s community engagement program (described in the Community Involvement Plan; Sabina 2018)

- Inuit Environmental Advisory Committee (IEAC) meetings
- Kitikmeot Socio-Economic Monitoring Committee (KSEMC) meetings
- NIRB public information meetings on Project monitoring
- Existing TK in the Kitikmeot Inuit Association's (KIA) Naonaiyaotit Traditional Knowledge Project (NTKP) database, use of which will continue to be guided by the TK Agreement signed between Sabina and the KIA in May 2012. Sabina currently has access to two TK reports related to the Project (i.e. KIA 2012; 2014).
- Where appropriate, Sabina may collect additional community perspectives and TK in support of Project monitoring activities.

Sabina will maintain a database(s) of community perspectives and TK relevant to Project monitoring activities, which may be accessed as required.

4. REPORTING AND INTEGRATION

Per NIRB Project Certificate No. 007, Sabina will prepare annual monitoring reports on topics including the socio-economic, terrestrial, freshwater, and marine environments. Where appropriate, these reports will contain a section entitled 'Incorporation of Community Perspectives and Traditional Knowledge in the Monitoring Program'. This section may contain the following information:

- 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.

5. REFERENCES

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- Nunavut Impact Review Board (NIRB). 2018. *Terminology and Definitions: NIRB Technical Guide Series*. December 2018.
- Sabina Gold & Silver Corp. (Sabina). 2018. *Community Involvement Plan*. Updated December 2018.

APPENDIX C: OUTFITTING/GUIDING BUSINESS CONSULTATION PROTOCOL

July 2019

**SABINA GOLD & SILVER CORP.
BACK RIVER PROJECT
OUTFITTING/GUIDING BUSINESS CONSULTATION PROTOCOL**

Overview and Purpose

The Back River Project (Project) is a gold mining project owned by Sabina Gold & Silver Corp. (Sabina or the Company) located within the western Kitikmeot Region of Nunavut. The Project is comprised of two main areas with an interconnecting Winter Ice Road: The Goose Property and a Marine Laydown Area (MLA) situated approximately 130km away along the western shore of southern Bathurst Inlet.

The Nunavut Impact Review Board's (NIRB) Project Certificate No. 007, Term and Condition No. 81 for the Project states:

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.

The purpose of this Protocol is to outline the process Sabina will follow to address the above Term and Condition.

Procedure

Outfitting and guiding businesses operating in the Project vicinity will be engaged by Sabina in four primary ways:

1. Biennial informational letters sent (by email) to all companies in possession of a current Outfitter Licence from the Government of Nunavut, whose community of operation includes either Cambridge Bay or Kugluktuk. Hunters and Trappers Organizations (HTOs) in Cambridge Bay, Kugluktuk, Bathurst Inlet, and Bay Chimo will also receive copies of this letter. These communities are located closest to the Project, where outfitting/guiding business interactions with the Project are more likely to occur.
 - The Government of Nunavut's Department of Economic Development and Transportation maintains a list of licenced tourism operators (<https://www.gov.nu.ca/edt/operators/>) where current outfitter information can be obtained.
 - Appendix A includes a contact list of HTOs and outfitting/guiding businesses potentially operating in the Project vicinity. This list will be updated by Sabina every two years.

- Informational letters will at a minimum include: an overview of Sabina's engagement process for outfitting/guiding businesses; a description and map of the Project; a description of opportunities for outfitting/guiding businesses to engage with Sabina on concerns/issues they may have about the Project; and contact information for Sabina.
 - Appendix B includes an example informational letter.
2. Ensuring Project information is readily available to outfitting/guiding businesses and other members of the public through avenues such as:
- Project website (<https://backriverproject.com/>) and Twitter account (@BRP_Sabina)
 - Company website (<http://www.sabinagoldsilver.com/>)
 - NIRB Public Registry (<http://www.nirb.ca/application?strP=r>)
 - Where appropriate, through individual requests made directly to Sabina
3. Providing outfitting/guiding businesses access to Sabina's Community Liaison Officer and office in Cambridge Bay:
- Sabina Gold & Silver Corp.
10 Omilik Road
Cambridge Bay, NU
X0B 0C0
Phone: (867) 983-3033
Fax: (867) 983-3133
Email: backriverproject@sabinagoldsilver.com
4. Providing outfitting/guiding businesses access to Sabina's Grievance Process (under development):
- This Process is being put in place for Project stakeholders to have concerns and other issues addressed.
 - Details on how stakeholders can access Sabina's Grievance Process will be provided in the future. In the meantime, stakeholders should contact Sabina for additional information.

Sabina will attempt to address feedback received from outfitting/guiding businesses in an expeditious manner and to the mutual satisfaction of both parties. However, complex issues may need to be addressed by the Grievance Process or through alternative issue resolution methods instead.

Roles and Responsibilities

Implementation of this Protocol, as well as ongoing updates or revisions to the Protocol, will be the responsibility of the Manager of Indigenous Affairs or similar position, or other designated management

personnel with the requisite skill set and experience. The Manager of Indigenous Affairs may also delegate responsibility for specific components of the Protocol to other personnel. Sabina will maintain an office location in Cambridge Bay staffed by a Community Liaison Officer, where stakeholders can obtain Project-related information and have complaints or other issues addressed. This Protocol will be reviewed by Sabina for potential improvements every two years.

Monitoring and Reporting

Implementation of this Protocol will be monitored by Sabina, in part, through Annual Reports submitted to NIRB. For example, Sabina's Socio-Economic Monitoring Plan notes the indicator *number of formal grievances/complaints filed pertaining to non-traditional land and resource use* will be monitored through an annual Socio-Economic Monitoring Report. Likewise, the reporting requirements for Term and Condition No. 81 will be followed by Sabina:

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 NIRB and any updated information should be provided in the annual report to the NIRB every year thereafter.

Sabina may also conduct separate internal monitoring of this Protocol and/or prepare internal reports for Company use.

Appendix A

HTOs and Outfitting/Guiding Businesses Potentially Operating in the Project Vicinity (current as of July 2019)

Organization	Description / Key Activities	Contact Information
Bathurst Inlet HTO	HTOs in Nunavut have harvesting-related powers and functions assigned to them under the Nunavut Agreement. HTOs may also coordinate with outfitting/guiding businesses within their jurisdictions, and/or be a source of information on land use, harvesting, and wildlife activities in their local area.	Bathurst Inlet Hunters and Trappers Organization c/o Ekaluktutiak Hunters and Trappers Organization P.O. Box 1270 Cambridge Bay, NU X0B 0C0 (867) 983-2426 ehtocb@qiniq.com
Bay Chimo HTO	HTOs in Nunavut have harvesting-related powers and functions assigned to them under the Nunavut Agreement. HTOs may also coordinate with outfitting/guiding businesses within their jurisdictions, and/or be a source of information on land use, harvesting, and wildlife activities in their local area.	Bay Chimo Hunters and Trappers Organization c/o Ekaluktutiak Hunters and Trappers Organization P.O. Box 1270 Cambridge Bay, NU X0B 0C0 (867) 983-2426 ehtocb@qiniq.com
Cambridge Bay HTO	HTOs in Nunavut have harvesting-related powers and functions assigned to them under the Nunavut Agreement. HTOs may also coordinate with outfitting/guiding businesses within their jurisdictions, and/or be a source of information on land use, harvesting, and wildlife activities in their local area.	Ekaluktutiak Hunters and Trappers Organization P.O. Box 1270 Cambridge Bay, NU X0B 0C0 (867) 983-2426 ehtocb@qiniq.com
Kugluktuk HTO	HTOs in Nunavut have harvesting-related powers and functions assigned to them under the Nunavut Agreement. HTOs may also coordinate with outfitting/guiding businesses within their jurisdictions, and/or be a source of information on land use, harvesting, and wildlife activities in their local area.	Kugluktuk Angoniatit Association – Hunters and Trappers Organization P.O. Box 309 Kugluktuk, NU X0B 0E0 (867) 982-4908 kugluktuk@krwb.ca
Bathurst Inlet Developments (1984) LTD	Outfitter Licence issued for the following communities of operation: Cambridge Bay, Kugluktuk. Activities include: Accommodation, Arts & Culture, ATV or	Bathurst Inlet Developments (1984) LTD P.O. Box 820 Yellowknife, NT X1A 2N6

	Snowmobile, Boating, Camping and Hiking, Canoeing and Kayaking, Fishing, Hunting, Meetings and Events, Tours.	(867) 446-2654 boydw@bathurstinlet.com
Bathurst Inlet Lodge LTD.	Outfitter Licence issued for the following communities of operation: Cambridge Bay, Kugluktuk. Activities include: Accommodation, Arts & Culture, Bird Watching & Wildlife Viewing, Boating, Camping and Hiking, Canoeing and Kayaking, Fishing, Food and Beverage, Meetings and Events, Tours.	Bathurst Inlet Lodge LTD. P.O. Box 820 Yellowknife, NT X1A 2N6 (867) 446-2654 boydw@bathurstinlet.com
Black Feather	Outfitter Licence issued for the following communities of operation: Kugluktuk. Activities include: Camping and Hiking, Canoeing and Kayaking, Eco-Tourism, Floe Edge.	Black Feather Wilderness Adventures and Services 250 McNaught's Rd. Seguin, ON P2A 0B2 (705) 746-1372 info@blackfeather.com
Bremen, Hapag-Lloyd	Outfitter Licence issued for the following communities of operation: Cambridge Bay. Activities include: Cruise Ship, Eco-Tourism.	Hapag-Lloyd Kreuzfahrten GmbH Ballidamm 25, 20095 Hamburg, Germany +49-40-307030-583 barbara.hafmann@hl-cruises.com
Ekaluktutiak Sports Hunt Ltd./Ellis River/Cape Peel/Wellington Bay	Outfitter Licence issued for the following communities of operation: Cambridge Bay. Activities include: Accommodation, ATV or Snowmobile, Hunting, Transportation.	Ekaluktutiak Sports Hunt Ltd. P.O. Box 1270 Cambridge Bay, NU X0B 0C0 (867) 983-2426 ehtocb@qiniq.com
Hakongak Outfitting	Outfitter Licence issued for the following communities of operation: Cambridge Bay. Activities include: Accommodation, ATV or Snowmobile, Bird Watching & Wildlife Viewing, Fishing, Hunting, Tours.	Hakongak Outfitting P.O. Box 2053 Cambridge Bay, NU X0B 0C0 (867) 983-2799 naikak@northwestel.net
High Arctic Lodge	Outfitter Licence issued for the following communities of operation: Cambridge Bay. Activities include: Accommodation, Arts & Culture, Bird Watching & Wildlife Viewing, Boating, Camping and Hiking, Canoeing and Kayaking, Fishing, Food and Beverage, Hunting, Meetings and Events, Tours, Transportation.	High Arctic Sportfishing Camps Ltd. P.O. Box 280 Penticton, BC V2A 6J9 (250) 497-2000 fred@higharctic.com
Jackpine Paddle	Outfitter Licence issued for the following communities of operation: Kugluktuk. Activities include: Canoeing and Kayaking, Eco-Tourism.	Jackpine Paddle/Consulting 203-5112 52 nd St. Yellowknife, NT X1A 1T6 (867) 445-4512

		info@jackpinepaddle.com
Koda Adventure Tours	Outfitter Licence issued for the following communities of operation: Kugluktuk. Activities include: Arts & Culture, ATV or Snowmobile, Bird Watching & Wildlife Viewing, Boating, Cruise ship, Eco-Tourism, Fishing, Food and Beverage, Parks Visits, Tours, Transportation.	Koda Adventure Tours P.O. Box 190 Kugluktuk, NU X0B 0E0 (867) 446-1944 kodaadventuretours@gmail.com
MS Fram, Hurtigruten	Outfitter Licence issued for the following communities of operation: Cambridge Bay. Activities include: Bird Watching & Wildlife Viewing, Cruise Ship, Eco-Tourism, Tours.	Hurtigruten Langkaia 1 Oslo, Norway N-0150 +47 97 05 70 30 karin.strand@hurtigruten.com
MS Roald Amundsen, Hurtigruten	Outfitter Licence issued for the following communities of operation: Cambridge Bay. Activities include: Bird Watching & Wildlife Viewing, Cruise Ship, Eco-Tourism, Tours.	Hurtigruten Langkaia 1 Oslo, Norway N-0150 +47 97 05 70 30 karin.strand@hurtigruten.com
MV Hanseatic nature, Hapag-Lloyd	Outfitter Licence issued for the following communities of operation: Cambridge Bay. Activities include: Cruise Ship.	Hapag-Lloyd Kreuzfahrten GmbH Ballidamm 25, 20095 Hamburg, Germany +49-40-307030-583 barbara.hafmann@hl-cruises.com
Nahanni Wilderness Adventures	Outfitter Licence issued for the following communities of operation: Kugluktuk. Activities include: Canoeing and Kayaking, Eco-Tourism, Tours.	Nahanni Wild 969A Lawrence Grassi Ridge Canmore, AB T1W 3C3 (406) 688-7238 1 (888) 897-5223 info@nahanniwild.com
Ocean Endeavour, Adventure Canada	Outfitter Licence issued for the following communities of operation: Kugluktuk. Activities include: Arts & Culture, Cruise Ship, Eco-Tourism, Tours.	Adventure Canada 14 Front St. S. Mississauga, ON L5H 2C4 1 (800) 363-7566 brittany@adventurecanada.com
Plummer's Arctic Lodges	Outfitter Licence issued for the following communities of operation: Kugluktuk. Activities include: Accommodation, Bird Watching & Wildlife Viewing, Boating, Fishing, Food and Beverage, Transportation.	Plummer's Arctic Lodges Great Bear Lake Lodge Ltd. 950 Bradford St. Winnipeg, MB R3H 0N5 1 (800) 665-0240 fish@plummerslodges.com
RCGS Resolute, One Ocean Expeditions, Inc.	Outfitter Licence issued for the following communities of operation: Cambridge Bay. Activities include: Cruise Ship, Eco-Tourism.	One Ocean Expeditions Inc. 38121 2 nd Ave. Squamish, BC

		V8B 0A6 (604) 390-4900 shipops@oneoceanexpeditions.com
Wanapitei Canoe and Northern Outdoor Expeditions INC.	Outfitter Licence issued for the following communities of operation: Kugluktuk. Activities include: Camping and Hiking, Canoeing and Kayaking.	Wanapitei Canoe 338 Caves Rd. Douro-Dummer, ON K0L 3A0 (705) 652-3199 wecanoe@xplornet.com

Appendix B

Example Informational Letter

Month Day, Year

By Email

Re: Sabina Gold & Silver Corp.'s Engagement of Outfitting/Guiding Businesses Potentially Operating in the Vicinity of the Back River Project

To Whom It May Concern,

The Back River Project (Project) is a gold mining project owned by Sabina Gold & Silver Corp. (Sabina) located within the western Kitikmeot Region of Nunavut. The Project is comprised of two main areas with an interconnecting Winter Ice Road: The Goose Property and a Marine Laydown Area (MLA) situated approximately 130km away along the western shore of southern Bathurst Inlet. After a comprehensive five-year environmental assessment (EA) process, Sabina received its Project Certificate from the Nunavut Impact Review Board (NIRB) on December 19, 2017. The Project is currently in the pre-construction phase. A map of the Project area is provided in Figure 1.

Through Project Certificate No. 007, the NIRB has encouraged Sabina to consult with outfitting and guiding businesses that operate in the Project area. As a result, Sabina has an *Outfitting / Guiding Business Consultation Protocol* describing how outfitting and guiding businesses potentially operating in the Project vicinity will be engaged. This consists of:

- Biennial informational letters (i.e. this letter) sent to all companies in possession of a current Outfitter Licence from the Government of Nunavut, whose community of operation includes either Cambridge Bay or Kugluktuk. Hunters and Trappers Organizations (HTOs) in Cambridge Bay, Kugluktuk, Bathurst Inlet, and Bay Chimo also receive copies of this letter.
- Ensuring Project information is available to outfitting/guiding businesses and other members of the public through avenues such as:
 - Project website (<https://backriverproject.com/>) and Twitter account (@BRP_Sabina)
 - Company website (<http://www.sabinagoldsilver.com/>)
 - NIRB Public Registry (<http://www.nirb.ca/application?strP=r>)
 - Where appropriate, through individual requests made directly to Sabina
- Providing access to Sabina's Community Liaison Officer and office in Cambridge Bay (contact details below).
- Providing access to a Grievance Process (under development), whereby stakeholders (including outfitting/guiding businesses) can have concerns and other issues addressed. Please contact Sabina for additional information on accessing the Grievance Process.

Should your organization be interested in obtaining additional information on the Project or if you have any concerns/issues related to Project infrastructure, activities, or effects (including those related to the experience of the natural environment), please feel free to contact Sabina directly. When contacting Sabina about concerns/issues please provide as many details as possible (e.g. nature of concern/issue; relevant locations, timings, activities, and individuals; desired resolutions).¹ Alternatively, stakeholder comments related to Project monitoring may be provided directly to NIRB through Sabina's annual reporting process (contact info@nirb.ca or 1-866-233-3033 for additional information).

Sabina is committed to sustainable mineral development and acknowledges the importance of meaningful stakeholder engagement in achieving this. Should you have any comments or questions regarding this letter please don't hesitate to contact us.

Best Regards,

[Include Signature Here]

[Name]

[Title]

Sabina Gold & Silver Corp.
10 Omilik Road
Cambridge Bay, NU
Canada X0B 0C0
Phone: (867) 983-3033
Fax: (867) 983-3133
Email: backriverproject@sabinagoldsilver.com

¹ Sabina is primarily focused on effects arising in the Regional Study Area (RSA), which has been outlined in Figure 1.

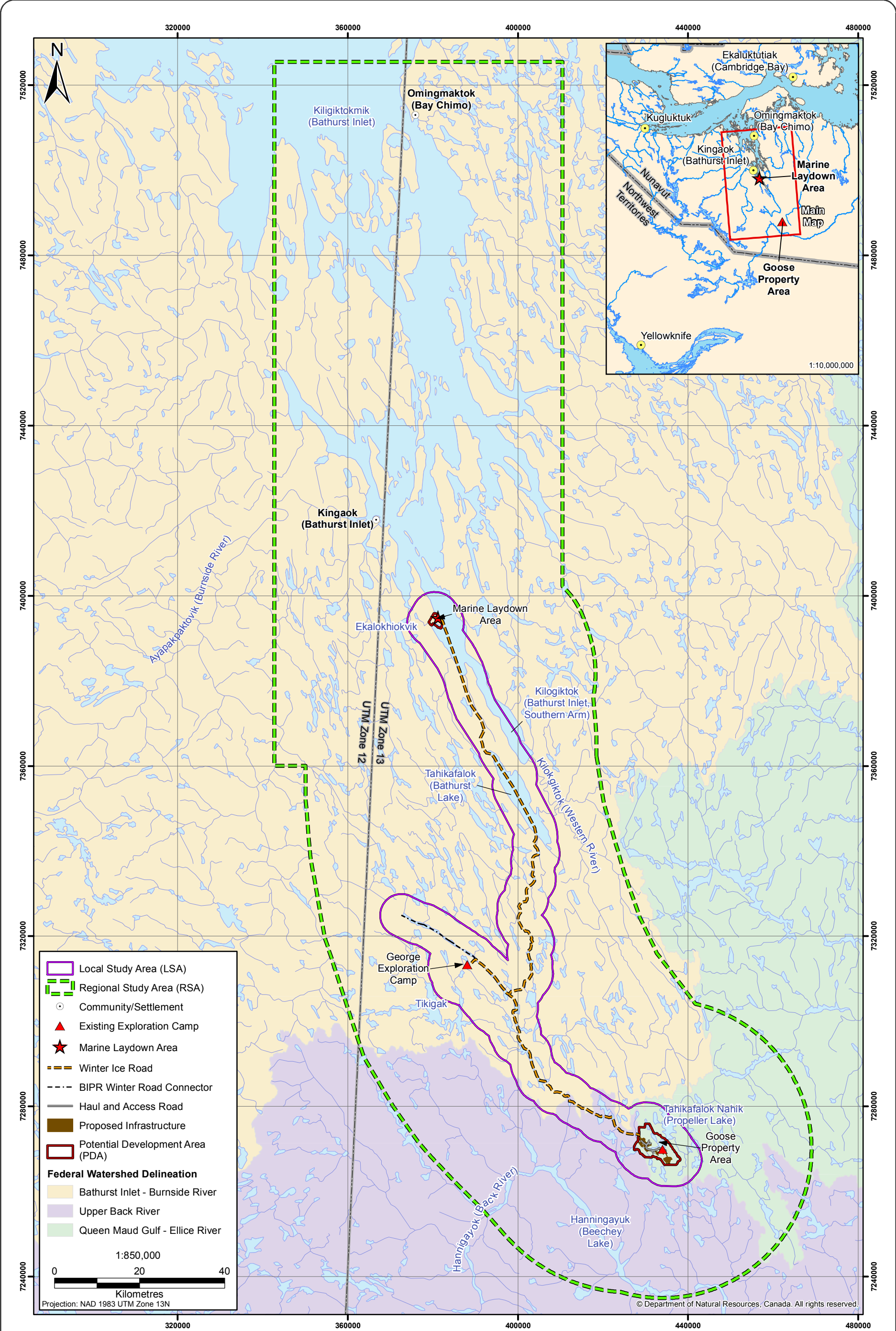


Figure 1