



NIRB File No.: 12MN036

NWB File Nos.: 2BC-BRP1819 and 2AM-BRP1831

April 7, 2020

To: Back River Project Distribution List

Sent via email

Re: Comment Request for Sabina Gold & Silver Corp.'s Back River Project 2019 Annual Report

Dear Parties:

On April 3, 2020 the Nunavut Impact Review Board (NIRB or Board) received Sabina Gold & Silver Corp.'s (Sabina) Back River Gold Mine Project *2019 Annual Report* as required by the Back River Gold Mine Project Certificate No. 007. The report is available for review from the NIRB's online public registry at www.nirb.ca/project/124149.

Within the Documents Tab of the Project Dashboard, the target documents can be accessed from the 'Annual Reports' document category or by searching Document ID numbers 329187 through 329198.

As per Section 12.7.3 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and the Back River Gold Mine Project Certificate, the NIRB's monitoring program focuses on compliance and effects monitoring. The NIRB requests that interested parties review the *2019 Annual Report* and provide comments with respect to their jurisdiction and/or area of expertise by **May 21, 2020** on the following:

1. Effects monitoring
 - a. Whether the conclusions reached by Sabina in the *2019 Annual Report* are valid; and
 - b. Any areas of significance requiring further supporting information or any changes to the monitoring program which may be required.

In addition, the NIRB is requesting that regulatory authorities also provide comments and/or information associated with their respective mandate and jurisdiction, with respect to the following:

2. Compliance monitoring

- a. Provide a summary of any compliance monitoring and/or site inspections undertaken in association with the Project, including specifically;
 - i. Identify the Terms and Conditions from the Project Certificate which have been incorporated into any permits, certificates, licences or other approvals issued for the Project, where applicable;
 - ii. A summary of any inspections conducted during the 2019 reporting period, and the results of these inspections; and
 - iii. A summary of Sabina's compliance status with regard to authorizations that have been issued for the Project.

Please send all forthcoming submissions directly to the NIRB via email at info@nirb.ca.

Should you have any questions or require clarification regarding the NIRB's monitoring of the Back River Gold Mine Project, please contact the undersigned via email at johokannoak@nirb.ca.

Sincerely,



Jaida Ohokannoak
Technical Advisor II
Nunavut Impact Review Board

cc: Matthew Pickard, Sabina Gold & Silver Corp.
Merle Keefe, Sabina Gold & Silver Corp.