

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 115/001
NIRB File: 12MN036



May 20, 2020

via email at: info@nirb.ca

Jaida Ohokannoak
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Dear Jaida Ohokannoak:

RE: 12MN036 – Sabina Gold and Silver Corp – Back River – 2019 Annual Report

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) by Sabina Gold and Silver Corp (the proponent) regarding the above-mentioned Annual Report.

ECCC's specialist advice is based on our mandate pursuant to the *Canadian Environmental Protection Act*, *Species at Risk Act*, *Migratory Birds Convention Act* and the pollution prevention provisions of the *Fisheries Act*

ECCC provides the following comments:

1. Incinerator Stack Testing

Reference(s)

- Sabina Back River Project – Incineration Management Plan (2019). Section 8.1 Incinerator Emissions Testing.
- Canadian Council of Ministers of the Environment (2001). Canada Wide Standards for Dioxins and Furans

Comment

Inefficient or improper incineration of waste can result in the release of dioxins and furans (PCDD/Fs) and mercury. These contaminants bioaccumulate in the environment, and may cause adverse effects to human health and the environment. Appropriate adaptive management is necessary in order to reduce these emissions. This includes stack testing of incinerator emissions. The proponent indicated that they will conduct stack testing of the incinerator once within the first year of operations. However, the proponent did not indicate



any plans for follow-up stack testing. Follow-up stack testing is recommended within a specified time-period (e.g. within 6 months), if stack testing exceeds the Canada Wide Standards for Dioxins and Furans or Mercury. Follow-up stack testing at 3-year intervals after initial testing, to ensure that emissions of these contaminants continue to be limited is industry best practice.

ECCC Recommendation(s)

ECCC recommends that the proponent provide details on actions they will take should initial incinerator stack testing results exceed Canada-Wide standards, including implementation of a follow-up test. ECCC also recommends that the proponent provide details on what management actions they will take to monitor emissions after the initial stack test. ECCC recommends that the proponent conduct additional stack testing at a 3-year interval and recommend that the proponent revise relevant management plans accordingly.

If you need more information, please contact Eva Walker at (867) 669-4744 or Eva.Walker@Canada.ca.

Sincerely,

[original signed by]

Eva Walker
A/Senior Environmental Assessment Coordinator

cc: John Olyslager, Acting Head, Environmental Assessment North (NT and NU)