



NIRB File No.: 12MN036
NWB File No.: 2AM-BRP1831

June 29, 2020

To: Back River Distribution List

Sent via email

Re: Request for Comments on Sabina Gold and Silver Corp.'s "Back River Project 2020 Modification Package" Project Proposal for the Back River Project

Dear Parties:

On June 9, 2020 the Nunavut Impact Review Board (NIRB or Board) received a referral from the Nunavut Planning Commission (NPC or the Commission) to assess Sabina Gold and Silver Corp. (Sabina) "Back River Project 2020 Modification Package" project proposal noting the project proposal was outside the area of an applicable land use plan. The Commission referred the proposal to the NIRB for assessment as it proposes development of a component or activity that was not part of the previously amended proposal and therefore represents a significant modification to the approved project and under Section 12.4.3 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada* (Nunavut Agreement) requires assessment by the NIRB prior to issuance of any permits, licences or other approvals by associated Regulatory Authorities. The Commission further noted that there may be cumulative effects considerations from the original assessment that should be re-assessed. On June 10, 2020 Sabina provided the "Back River Project 2020 Modification Package" project proposal for the Board's consideration followed by additional information provided on June 16, 2020.

These submissions describe changes to the scale and scope of activities related to components of the existing Back River Project. As part of the Board's process to determine the significance of these proposed changes, parties are being provided an opportunity to comment on these submissions. Following receipt of parties' feedback and comments, the NIRB will be providing procedural guidance in respect to next steps in the NIRB's consideration of these submissions from Sabina.

BACK RIVER PROJECT 2020 MODIFICATION PACKAGE OVERVIEW

As set out in the June 10 and June 16 submissions, Sabina has identified proposed modifications that would further optimize and de-risk the Back River Project. Sabina noted that the modifications

are a result of advancements identified during detailed engineering and additional field work conducted since the issuance of the Nunavut Water Board Type A Water Licence. The proposed project is located approximately 400 kilometres (km) southwest of the community of Cambridge Bay, 95 km southeast of the southern end of Bathurst Inlet, and 520 km northeast of Yellowknife, Northwest Territories. The proposed modifications to the original project would include extension to the existing permitted airstrip at Goose Property and at the Marine Laydown Area; extension of the planned underground operations at Umwelt; modifications to the waste rock storage infrastructure; shoreline pad extensions at the MLA; additional fuel storage at the MLA and upgrades to the winter road. Sabina noted that the 2020 Modification Package is not the result of “phased development” as the changes are not associated with material production expansion to the mine. Finally, Sabina noted that it has not yet identified the specific timing for these Project modifications within the construction sequence but provided general guidance within the modification package as to when Sabina plans to proceed. The Modification Package proposal would extend the operations phase by 12 years compared to the previously proposed ten (10) years and all other phase durations would remain the same.

The project description and associated correspondence can be accessed directly via the NIRB’s online public registry system at www.nirb.ca/project/124149:

- Sabina Cvr Ltr Re Modification Package-IA1E [Doc ID: 330404],
- Sabina Modification Package-Pt 1-IA1E [Doc ID: 330405],
- Sabina Modification Package-Pt 2-IA1E [Doc ID: 330406], and
- Sabina Follow-up Clarification Ltr Re Mod Pkg Final-IMTE [Doc ID: 330507].

The scope of activities described within the “Back River Project 2020 Modification Package” includes the following undertakings, works or activities:

- Goose Property:
 - Extension of the Umwelt underground workings from 650 metres (m) depth to 900 m to access additional high-grade reserves;
 - Expansion of the Goose all-weather airstrip from 1,500 m by 47 m (5,000 by 150 feet) to 1,800 by 61 m (6,000 by 200 feet);
 - *Ongoing use* of seasonal ice airstrip;
 - Increase in water usage from 502,000 cubic metres (m³) to 822,450 m³ annually, with water *continue* to be sourced from Goose Lake and Big Lake;
 - *Ongoing use* of approved facilities and infrastructure at the Goose Property;
- Marine Laydown Area (MLA):
 - Expansion of the MLA all-weather airstrip from 915 m by 47 m (3,000 by 150 feet) to 1,500 by 61 m (5,000 by 200 feet);
 - *Ongoing use* of seasonal ice airstrip;
 - Development of a MLA fuel transfer area near the MLA Freight Storage Area;
 - Installation of an intermediate fuel pump station;
 - Installation of a 500,000 litre fuel tank;
 - Extension of existing shoreline pad to facilitate offloading;
 - *Ongoing use* of approved infrastructure and facilities at MLA;
- Winter Ice Road (WIR):
 - Upgrade select sections of the WIR through placement of aggregate over approximately 15 kilometers (km) of the 160 km alignment;

- Increase in water usage for ice road construction and maintenance from 108,000 m³ (675 m³ per km) to 324,000 m³ (2,025 m³ per km);
- Replacement of mobile emergency shelter with three (3) permanent camps along the WIR. Potential continued use of the mobile emergency shelter
- *Ongoing use* of waste and water management infrastructure with capture of the adjustments proposed at the Goose Property;
 - Increase in waste rock volume from 59 to 86.6 million tonnes (Mt);
 - Increase in overburden volume from 5.3 Mt to 6.5 Mt;
 - Reduction of waste rock storage areas (WRSA) from four (4) to three (3) [Umwelt WRSA, Llama WRSA and Tailings storage facility WRSA]
- Reduction in open pits from four (4) to three (3) [Umwelt open pit, Llama open pit and Goose Main open pit];
- Reduction in underground mines from four (4) to one (1) [Umwelt underground mine];
- Reduction of tailings storage facilities from three (3) to two (2) [Tailings Storage Facility and Llama Tailings Facility] with decrease in storage volumes from 19.8 Mt to 12.4 Mt;
- Additional two (2) years of operations while other phases remain the same;
- Reduction in process plant throughput of 6,000 tonnes per day to 3,000 to 4,000 tonnes per day; and
- Usage of small diameter flexible pipe as MLA desalination plant intake and discharge instead of approved permanent pipes.

Sabina has conducted a self-assessment on each of the proposed modification and provided the conclusion that, in its view, the changes proposed do not constitute significant modifications to the approved project. However, Sabina anticipates that the modification may have implications for the NIRB's monitoring program required reporting, and that, as a result, may wish to invite comments on whether Project Certificate No. 007 Terms and Conditions need reconsideration.

In recognition of the important role of public and technical submissions that supported the development of the terms and conditions in the existing Project Certificate, the NIRB is requesting comments from parties prior to determining whether the proposed changes warrant reconsideration of the existing Project Certificate No. 007 in accordance with Section 12.8.2 of the *Nunavut Agreement* and s. 112(1) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*). By copy of this letter, the NIRB invites interested parties, members of the public, and those regulatory authorities with jurisdiction over components of the Back River Project to provide comments and advice to the Board with respect to the following:

- a) Whether the proposed modification constitutes a significant modification to the original project as previously assessed and subsequently modified and approved by the NIRB;
- b) Whether the proposed modification is consistent with the terms and conditions of the existing Project Certificate No. 007, or are changes to the Project Certificate necessary to reflect the modification; and
- c) Any matter of importance to the commenting party related to the Board's processing of the project proposal.

The NIRB requests that parties submit comments directly to the NIRB via email at info@nirb.ca or through the online public registry at www.nirb.ca by **July 13, 2020**.

SUMMARY

Recognizing current measures in place across the country to implement public health orders, the NIRB would like to remind parties that if additional time is required to develop submissions, please submit a request in writing to the NIRB office as soon as possible. The request must specify the additional time being sought and reasons why, so that the Board is able to consider each request based on the justification provided and if found acceptable, also provide all parties with equal opportunity to work on their submissions.

Should you have any questions or require additional clarification regarding the NIRB's approach to assessing either of the above noted project proposals, please contact the undersigned directly at sgranchinho@nirb.ca. If you have questions related to the proposal or accessing the information, please contact Keith Morrison, Technical Advisor II, at kmorrison@nirb.ca.

Sincerely,



Sophia Granchinho, M.Sc., EP
Manager, Impact Assessment
Nunavut Impact Review Board

cc: Matthew Pickard, Sabina Gold and Silver Corp.
Merle Keefe, Sabina Gold and Silver Corp.
Sharon Ehloak, Nunavut Planning Commission
Peter Scholz, Nunavut Planning Commission
Stephanie Autut, Nunavut Water Board
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