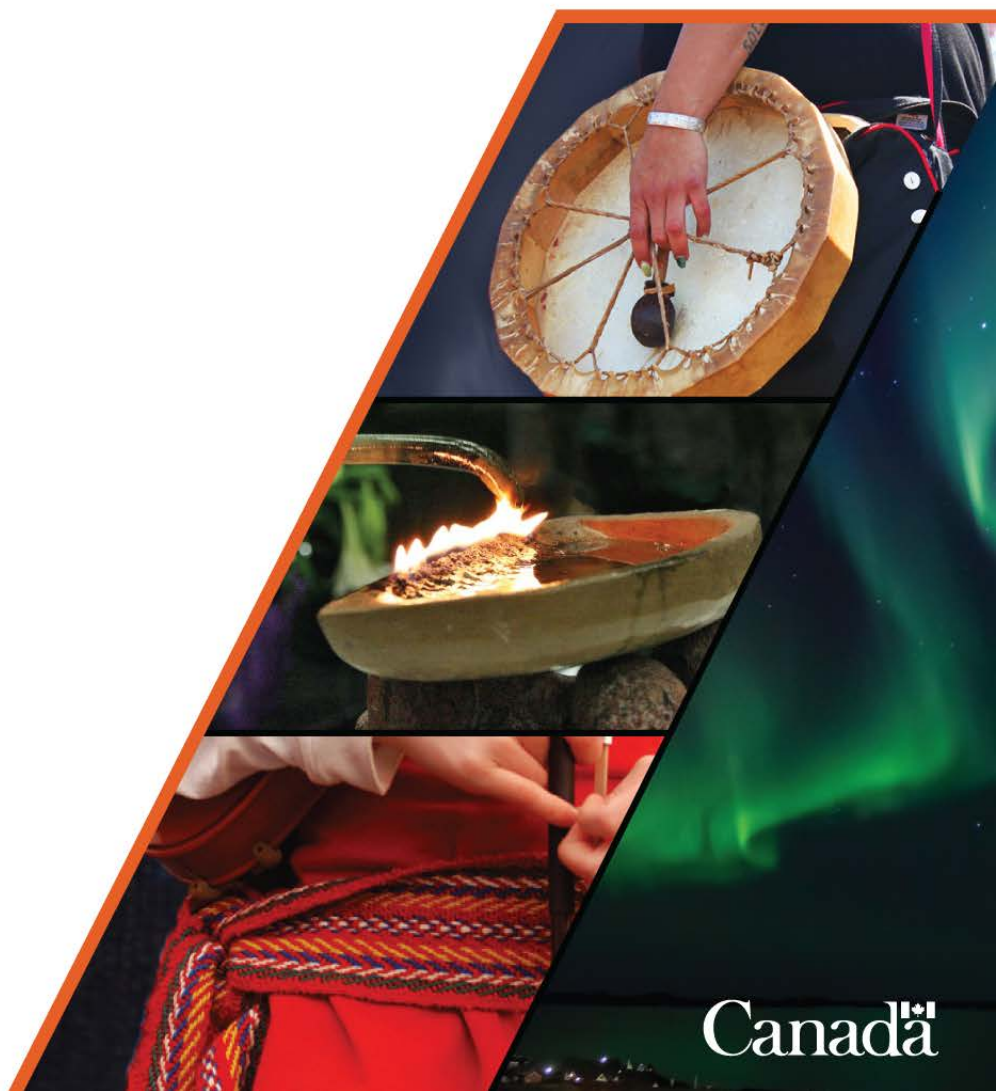




# CIRNAC Comments to NIRB

## Re: Sabina Gold and Silver Corp's "Back River Project 2020 Modification Package" Project Proposal for the Back River Project



Nunavut Regional Office  
P.O. Box 100  
Iqaluit, NU, X0A 0H0

Your file - Votre référence  
12MN036  
Our file - Notre référence  
CIDMS # 1286784

July 13, 2020

Talia Maksagak  
Manager, Technical Administration  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU X0B 0C0  
Via email: [info@nirb.ca](mailto:info@nirb.ca)

Dear Ms. Maksagak,

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

On June 29, 2020, the Nunavut Impact Review Board (NIRB) invited parties to comment on Sabina Gold and Silver Corp. (Sabina)'s "Back River 2020 Modification Package" Project Proposal for the Back River Project.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the following documents related to the above-mentioned proposal:

- Sabina Cvr Ltr Re Modification Package (2020);
- Sabina Modification Package-Pt 1 (2020);
- Sabina Modification Package-Pt 2 (2020);
- Sabina Follow-up Clarification Ltr Re Mod Pkg Final (2020);
- Black River Project Description (2012);
- Final Environmental Impact Statement, Volume 2: Project Description and Alternatives (2015);
- Final Environmental Impact Statement Supporting Volume 10: Management Plans (2015);
- Back River Road Management Plan 2015;
- Final Environmental Impact Statement Addendum, Volume 2 Addenda: Project Description and Alternatives (2017);
- NWB – Main Application Document/Form (2017); and
- NIRB Project Certificate No.: 007 (19 December 2017).



Based on this review, CIRNAC offers the following responses pertaining to NIRB's request:

**a) Whether the proposed modification constitutes a significant modification to the original project as previously assessed and subsequently modified and approved by the NIRB;**

CIRNAC notes the following substantial changes to the scale of activities related to original components and activities of the existing Back River Project:

- The proposal to install a new intermediate fuel pump station and 500,000 L fuel tank at the Marine Laydown Area (MLA) fuel transfer area near the MLA Freight Storage Area;
- Approximately 38% increase in the depth of Umwelt underground workings (from 650 m depth to 900 m depth);
- About 20% and 30% increase in length and width, respectively, of the Goose Property all-weather airstrip;
- Approximately 64% and 30% increase in length and width, respectively, of the MLA all-weather airstrip;
- A 64% increase in annual water usage from Goose Lake and Big Lake (from 502,000 m<sup>3</sup> to 822,450 m<sup>3</sup>);
- A 200% Increase in water usage (from 108,000 m<sup>3</sup> to 324,000 m<sup>3</sup>) for ice road construction and maintenance;
- Approximately 47% increase in waste rock volume (from 59 Mt to 86.6 Mt);
- Around 23% increase in overburden volume (from 5.3 to 6.5 Mt);
- A 20% increase in operational phase of the mine (from 10 years to 12 years); and
- Replacement of mobile emergency shelter with three permanent camps along the Winter Ice Road.

CIRNAC acknowledges Sabina's position that the proposed Project modifications, as presented in the "Back River Project 2020 Modification Package", represent refinements (adjustments) to the original conceptual design meant to optimize and de-risk the Project. CIRNAC notes the proposed changes were not included in the Final Environmental Impact Statements (2015 and 2017 Addendum) previously assessed and approved by the NIRB; hence any potential biophysical and socio-economic effects (including cumulative effects) that may result from the proposed changes have not been assessed. Therefore, CIRNAC is of the view that an assessment of the proposed modifications may be warranted in order to identify and mitigate any potential adverse effects (including cumulative effects) to the valued ecosystem and socio-economic components.

CIRNAC appreciates the NIRB's public distribution of Sabina's "Back River 2020 Modification Package" to interested parties for comments. Any concerns raised by affected Inuit for the proposed modifications, particularly those engaged in traditional



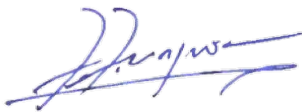
land use activities, should be carefully considered when making a determination on how to proceed with approving the proposed changes. If issues of public concern are raised, there should be adequate opportunity for the exchange of information between Sabina and intervenors to ensure mutually acceptable mitigation measures are put in place.

**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;**

Although, CIRNAC has not identified any specific terms and conditions to be reconsidered, it is CIRNAC's view that an assessment of current modification package proposal may lead to the identification of existing terms and conditions which may require updates or new terms and conditions to be included in the amended Project Certificate No. 007 to reflect the proposed changes, especially the construction of new infrastructure, post construction restoration, operation, closure and decommissioning of mine.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with NIRB and Sabina throughout the project's next steps. Should you have any questions, please contact Amal Roy at [amal.roy@canada.ca](mailto:amal.roy@canada.ca) or 867 975 4741.

Sincerely,



Felexce Ngwa  
Manager, Impact Assessment

