



Transport Canada Transports Canada

Programs, Environmental Services  
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R3C 0P6

Your file Votre référence  
12MN036

Our file Notre référence  
7075-70-1-115

July 15, 2020

Tara Arko  
Director, Technical Services  
Nunavut Impact Review Board  
Sent via email to: [info@nirb.ca](mailto:info@nirb.ca)

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

Dear Ms. Arko:

Transport Canada has reviewed the subject proposal and request for comments. As a Responsible Minister for the previously approved Back River Project (December 2017, NIRB Project Certificate NO.: 007), Transport Canada offers the following response:

### **Back River Project 2020 Modification Package**

Transport Canada understands that the Proponent is proposing several changes to the existing project, which include:

- Water withdrawals from George Lake and Big Lake for use at the Goose Property.
- An extension of the shoreline pad below the high water mark at the marine laydown area.
- The installation of a fuel transfer area at the marine laydown area, which would include an intermediate fuel pump station and single 500,000-L fuel tank.

Transport Canada notes that the extension of the shoreline pad into the waters of Bathurst Inlet and works in George and Big Lake may be subject to review and approval under the *Canadian Navigable Waters Act* (CNWA). Additionally, while not the subject of an approval from Transport Canada, the proposed installation and operation of the fuel transfer area will need to comply with Part 8 of the *Canada Shipping Act, 2001*. This may include amendments of the existing oil pollution emergency plan (NIRB Document No. 319643) for the project which is reviewed by Transport Canada.

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Although additional regulatory approvals may be required as a result of the Sabina Back River 2020 Modification Package, Transport Canada does not have a position on the significance of these modifications and will take its direction from NIRB, following its determination.

Transport Canada appreciates the opportunity to provide these comments on the Back River Project 2020 Modification Package. Should you have any questions regarding Transport Canada's comments, please contact Adam Downing via email at [adam.downing@tc.gc.ca](mailto:adam.downing@tc.gc.ca) or by telephone at 204-771-0787.

Sincerely,



Anita Gudmundson  
Manager, Environmental Programs, Prairie and Northern Region  
Transport Canada | Government of Canada