

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



June 30, 2022

via email at: info@nirb.ca

Kelli Gillard
Manager, Project Monitoring
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 1J0

Dear Kelli Gillard:

RE: 12MN036 – Sabina Gold and Silver Corp. – Back River Project – 2021 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 2021 Annual Report.

ECCC is providing technical, science-based information and knowledge based on our mandate pursuant to the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*. These comments are intended to inform the assessment of this project's potential effects in the receiving environment and on valued ecosystem components. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

1. Air Quality

Reference(s)

- Sabina Gold & Silver Corp. Back River Project 2021 Annual Report, Section 4.5.1 Air Quality (PC TCs 1 through 5), Project Certificate Condition No. 2
- Air Quality Monitoring and Management Plan (AQMMP) July 2019, Section 7 Monitoring Program



Comment

The annual report states that "Dustfall jars and NO2 passive cartridges were deployed at each station during the July installation and were retrieved October 3rd, 2021 and submitted to Bureau Veritas for laboratory analysis." The AQMMP states that the sample periods will be approximately 30 days. The reported long sample period exceeding 60 days impairs the detection of seasonal variability for the measured parameters.

ECCC Recommendation(s)

ECCC recommends that the Proponent explain the apparent discrepancy in the sample periods between the AQMMP and the monitoring report, and indicate whether future sample periods will be approximately 30 days.

2. Climate and Meteorology

Reference(s)

- Sabina Gold & Silver Corp. Back River Project 2021 Annual Report, Section 4.5.2 Climate and Meteorology (PC TCs 6 through 8), Project Certificate Condition No. 8

Comment

There are discrepancies with the solar radiation figures. The caption for Figure TC8-5 is identical to that of Figure TC8-8 despite differences in the bar graphs for September through November. The zero solar radiation value for October in Figure TC8-8 is suspect given the non-zero values for November for both Figures TC8-5 and TC8-6.

ECCC Recommendation(s)

ECCC recommends that the Proponent provide clarification regarding the apparent discrepancies in the figures.

If you need more information, please contact Stephinie Mallon at Stephinie.Mallon@ec.gc.ca.

Sincerely,

[original signed by]

Stephinie Mallon
Environmental Assessment Officer

cc: Jody Small, Acting Head, Environmental Assessment North (NT and NU)