



NIRB File No.: 12MN036

NWB File Nos.: 2BC-BRP1819 and 2AM-BRP1831

December 7, 2022

Matthew Pickard
Vice President, Environment & Sustainability
Sabina Gold & Silver Corp.
Suite 202-930 West 1st St., Suite 202
Vancouver, BC V7B 3N4

Sent via email: mpickard@sabinagoldsilver.com.

Re: The Nunavut Impact Review Board's 2021-2022 Annual Monitoring Report for the Back River Project and the Board's Recommendation

Dear Matthew Pickard:

The Nunavut Impact Review Board (NIRB or Board) is hereby releasing its *2021-2022 Annual Monitoring Report for the Back River Project* (Monitoring Report) and the NIRB's Assessment of Sabina Gold & Silver Corp.'s Compliance Status with the Back River Mine Project Certificate No. 007 (Appendix A). The enclosed Monitoring Report is based on the NIRB's monitoring activities as set out within the Back River Mine Project Certificate No. 007 and Sections 12.7.1 and 12.7.2 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and s. 135 of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*). The report contains the findings of information that was provided to the Board between October 2021 through September 2022. The result provided to the Board during this monitoring period do not necessarily represent data that was collected in the 2021-2022 period; but due to the time needed to analyze the data, it may have been collected in previous years.

All materials about the NIRB's ongoing Monitoring program for the Back River Project can be accessed online from the NIRB's Public Registry at www.nirb.ca/projects/124149.

By way of a motion carried out during its regular meeting held in October 2022, the Board has issued the following recommendations to assist Sabina in achieving compliance with the Back River Mine Project Certificate No. 007. These recommendations ensure that the NIRB has all the information necessary to adequately discharge its mandate with respect to provisions within Section 12.7 of the *Nunavut Agreement* and s. 135 of *NuPPAA* as they pertain to the Back River Project.

Outstanding Information and Monitoring

In the NIRB decision on the “2020 Modification Package”, the Board stated that with the associated activities approved, it considered the Back River Project in the construction phase and required submission of the information outlined in Project Certificate No. 007 warranted for that stage of development. The NIRB received some of the additional information but did not receive all the required information this past monitoring year. Noting that on September 7, 2022, Sabina issued a formal notice that the Back River Project was in construction, the NIRB is providing the below list of outstanding information which must be submitted within this monitoring year (i.e., before September 1, 2023).

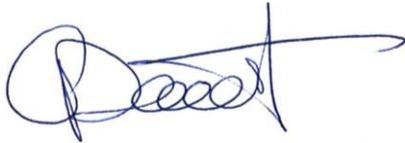
The Board requires Sabina to submit within 45 days of receiving this recommendation a plan which outlines how and when the listed documents will be provided within the upcoming monitoring year to address the requirements of the Terms and Conditions:

Term and Condition-Topic	Deliverable
Nos 9 and 10 – Noise and Vibration	Demonstration of mitigation measures and monitoring undertaken throughout the year to achieve appropriate sound levels at site
Nos 11, 12 and 13 – Permafrost Monitoring and Sensitive Landform Mitigation	Information regarding the mitigation measures and monitoring that is occurring through construction to ensure permafrost integrity is maintained (e.g., permafrost mapping, monitoring of disturbed tundra, geotechnical investigations, etc.)
No. 52 – Caribou Mitigation	Evaluate the potential impacts to caribou from planned mineral exploration within its mineral tenures and outside the approved project development area with the Government of Nunavut, the Government of the Northwest Territories, the Kitikmeot Inuit Association, and other relevant parties
No. 71 – Staff Schedule	Submission of a detailed staff schedule developed in consultation with the Kitikmeot Inuit Association and the Government of Nunavut to ensure that labour force requirements are as predicted in the FEIS and FEIS Addendum
No. 72 – Registration of Trades Workers	Information regarding Sabina’s efforts at ensuring that the Government of Nunavut has accurate information to assist in its role as overseer of the Apprenticeship Program
No. 75 – Educational Opportunities	Summary of information and/or collaboration with the Back River and Kitikmeot Socio-Economic Monitoring Committees to review and monitor education utilization of project employees getting training in either the Kitikmeot Region or any Northwest Territory communities
No. 76 – Inuktitut/Inuinnaqtun Training	Summary of information regarding any second language courses offered at site

No. 81 – Non-traditional Activity and Resource Use	Summary of information regarding the consultations and monitoring undertaken with outfitting and guiding businesses that operate in the regional study area (land and marine) including effects with the experience of the natural environment
No. 84 – Employee Housing	Summary of work conducted with the Kitikmeot Socio-economic Monitoring Committee, the Nunavut Housing Corporation and the Government of Nunavut on the design and implementation of a voluntary housing survey for Nunavummiut employees

Should you have any questions or require further clarification regarding this request or related to the NIRB’s monitoring program for the Back River Project, please contact the undersigned directly at gdaoust@nirb.ca or at (867) 983-4609, or Kelli Gillard, Manager, Project Monitoring at (867) 983-4619 or at kgillard@nirb.ca.

Sincerely,



Guillaume Daoust
 Technical Advisor II
 Nunavut Impact Review Board

cc: Merle Keefe, Sabina Gold & Silver Corp.
 Back River Project Distribution List

Enclosure: The Nunavut Impact Review Board’s *2021-2022 Annual Monitoring Report for the Back River Project (NIRB File No. 12MN036)*