



**NIRB File No.: 12MN036**

**NWB File No.: 2BC-BRP1819 and 2AM-BRP1831**

April 24, 2023

To: Back River Project Distribution List

*Sent via email*

**Re: Comment Request for Sabina Gold and Silver Corp.'s Back River Project 2022 Annual Report**

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Dear Parties:

On March 31, 2023, the Nunavut Impact Review Board (NIRB or Board) received Sabina Gold and Silver Corp.'s (Sabina) Back River Project 2022 *Annual Report* as required by the Back River Gold Mine Project Certificate No. 007. The NIRB requests that interested parties review the 2022 *Annual Report* and provide comments with respect to their jurisdiction and/or area of expertise by **June 8, 2023**.

The 2022 *Annual Report* and supplemental documents are available for review from the NIRB's Public Registry at [www.nirb.ca/project/124149](http://www.nirb.ca/project/124149). Access to the documents can be made by:

- Selecting the "Documents Tab" of the Project Dashboard(s) then select the "Annual Report" category on the left pane;
- Selecting "Recent Documents" on the Project Dashboards; or
- Searching the Public Registry with the Document ID numbers identified in Appendix A.

As per Section 12.7.3 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)*, s. 135(4) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14 (*NuPPAA*), and the Back River Gold Mine Project Certificate No. 007, the NIRB's monitoring program focuses on compliance and effects monitoring.

The NIRB requests that interested parties review the *2022 Annual Report* and provide comments with respect to their jurisdiction and/or area of expertise on the following:

1. Effects monitoring

- a. Whether the conclusions reached by Sabina in the *2022 Annual Report* are valid; and
- b. Any areas of significance requiring further supporting information or any changes to the monitoring program which may be required.

In addition, the NIRB is requesting that Regulatory Authorities also provide comments and/or information associated with their respective mandate and jurisdiction, with respect to the following. An example format for tracking comments and Proponent responses is included in Appendix B.

2. Compliance monitoring

- a. Provide a summary of any compliance monitoring and/or site inspections undertaken in association with the Project, including specifically;
  - i. Identify the terms and conditions from the Project Certificate which have been incorporated into any permits, certificates, licenses, or other approvals issued for the Project, where applicable, and report annually to the NIRB on the status of those incorporated terms and conditions;
  - ii. A summary of any inspections conducted during the 2022 reporting period, and the results of these inspections; and
  - iii. A summary of Sabina's compliance status with regard to authorizations that have been issued for the Project.

This information is important to assist the NIRB assess, coordinate, integrate, and ensure that the Board has the information to accurately measure effects, adequately assess compliance with terms and conditions, regulatory instruments, and agreements, and whether the project is carried out in accordance with the terms and conditions as set out in the original project certificate.

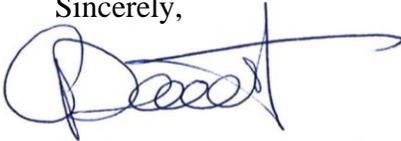
Please send all forthcoming submissions directly to the NIRB via email at [info@nirb.ca](mailto:info@nirb.ca).

Please note for your records that the NIRB has appointed the following individuals to serve as the Monitoring Officers for the Back River Gold Mine Project. All correspondence for these file(s) shall be submitted via the NIRB's Public Registry at [www.nirb.ca](http://www.nirb.ca) by logging into your account (NIRB File No. 12MN036) or emailing [info@nirb.ca](mailto:info@nirb.ca). To mail materials to the NIRB, please use the address below.

Nunavut Impact Review Board  
Attn: Guillaume Daoust and Robby Qammaniq  
Monitoring Officers  
P.O. Box 1360 (29 Mitik St.)  
Cambridge Bay, NU X0B 0C0

Should you have any questions or require clarification regarding the NIRB's monitoring of the Back River Gold Mine Project, please contact the undersigned at (867) 983-4606 or [gdaoust@nirb.ca](mailto:gdaoust@nirb.ca) or contact Robby Qammaniq, Technical Advisor II at (867) 983-4618 or [rquammaniq@nirb.ca](mailto:rquammaniq@nirb.ca).

Sincerely,



Guillaume Daoust  
Technical Advisor II  
Nunavut Impact Review Board

Attachments (2): Appendix A: NIRB Document ID Nos for Sabina's *2022 Annual Report*  
Appendix B: Example Table for Comments on Annual Report

cc: Matthew Picard, Sabina Gold and Silver Corp.  
Merle Keefe, Sabina Gold and Silver Corp.

## Appendix A: NIRB Document ID Nos for Sabina's 2022 Annual Report

Document Title	Back River Document ID No.
2022 Annual Report Pt 1 Main Report	343953
2022 Annual Report Pt 2 (Apps A-D)	343954
2022 Annual Report Pt 3 (Apps D-F)	343955
2022 Annual Report Pt 4 (App G)	343956
2022 Annual Report Pt 5 (Apps H-J)	343957

## Appendix B: Example Table for Comments on the Annual Report

<b>Comment Number:</b>	
<b>Subject/Topic:</b>	
<b>References:</b>	To the appropriate section in the Annual Report and/or Addendum
<b>Comment:</b>	<ol style="list-style-type: none"><li>1. Gap/Issue</li><li>2. Disagreement with the Annual Report conclusion</li><li>3. Reasons for disagreement with the Annual Report conclusion</li><li>4. Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix</li></ol>
<b>Conclusion/Request:</b>	