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Prairie & Northern Region  
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ECCC File: 6100 000 115/001  
NIRB File: 12MN036



June 8, 2023

via email at: [info@nirb.ca](mailto:info@nirb.ca)

Guillaume Daoust  
Technical Advisor II  
Nunavut Impact Review Board  
29 Mitik Street  
P.O. Box 1360  
Cambridge Bay, NU X0B 0C0

Dear Guillaume Daoust:

**RE: 12MN036 – B2Gold (formerly Sabina Gold & Silver Corp) – Back River Project – 2022 Annual Report**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) regarding the above-mentioned annual report.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and mitigation measures, and providing advice to decision makers on activities needed to mitigate these environmental effects. 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. Challenges with Air Quality Monitoring**

Reference(s)

- Sabina Back River Project 2022 Annual Report, Project Certificate Conditions No. 2 and 3

Comment

For Project Certificate Condition No. 2, the report states “No results from the air quality monitoring program in 2022 have been received due to logistical issues with collecting and shipping sample containers. The issues have been noted and Sabina is working on addressing them for the current and future air quality monitoring programs.” For Project



Certificate Condition No. 3, the report states “Proposed updates to the FDRP and AQMMP are planned for May of 2023 to align with advances to monitoring technologies and to reflect the current understanding of the project. Moreover, the updates will address issues that have been noted with current air quality monitoring program.” With the Project moving into full construction in 2023, air emissions will increase substantially, and therefore a timely resolution to these issues is becoming increasingly urgent.

#### ECCC Recommendation(s)

ECCC requests that a firm timeline be provided for resolution to the air quality monitoring challenges with updates provided to agencies before construction activities attain maximum intensity. If the resultant monitoring detects air quality impacts greater than anticipated, ECCC requests information be provided on mitigation responses.

## **2. Management of Potentially Acid Generating (PAG) Rock**

#### Reference(s)

- Sabina Back River Project 2022 Annual Report – Appendix B, Attachment 1 Summary of Observation and Recommendations – Goose Inspection Item – Road thickness

#### Comment

In their report, the Proponent’s consultant SRK indicated that it is “unaware of the Sabina quarry, run of mine, and underground rock geochemical sampling and monitoring plans. Therefore, SRK is unable to comment on the quality of this rockfill material or suitability for use as construction material. It is suggested that Sabina implement a program to track where any underground waste rock (or if / when PAG encountered in the pit pre-stripping and early development activities) is placed. *Sabina has indicated to SRK that they do now have a tracking plan in place and that site geochemical sampling plans and programs (as have been submitted as part of license submissions) have been followed in 2022. A review of the geochemical sampling and tracking plan was not done as part of the 2022 AGI but is suggested to be completed in 2023*”.

ECCC acknowledges the response from Sabina about putting in place a tracking plan that determines the suitability of the construction material; however, it is not clear if the proponent has any plans, or any mitigation strategy should the tracking plan identify that PAG rock was used for construction.

#### ECCC Recommendation(s)

ECCC recommends that the proponent explain how they would manage any PAG rock identified by the tracking plan that was used in construction.

## **3. Compliance Monitoring**

#### Comment

The Project is not currently subject to the *Metal and Diamond Mining Effluent Regulations* (MDMER) and majority of the site is located on Inuit Owned Land exempting it from the Storage Tank Systems Regulations. It has been noted that a fuel storage tank system has been constructed on the property which would be subject to the Environmental Emergency

regulations for diesel fuel and / or gasoline. It is expected that Back River is moving towards becoming an active mine and becoming subject to the MDMER.

ON-SITE INSPECTIONS:

- No onsite inspections were conducted over the 2022 field season at Back River

ECCC Files Regarding Reported 2022 Spills:

1. 2022-043 Lead Agency CIRNAC – Feb 17, 2022 – Fuel release to ice – No enforcement action taken.

If you need more information, please contact Victoria Shore at [Victoria.Shore@ec.gc.ca](mailto:Victoria.Shore@ec.gc.ca).

Sincerely,

*[original signed by]*

Victoria Shore  
Senior Environmental Assessment Officer

cc: Melissa Pinto, Acting Head, Environmental Assessment North (NT and NU)