



NIRB File No.: 12MN036

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

October 31, 2018

Matthew Pickard
Vice President, Environment & Sustainability
Sabina Gold & Silver Corp.
Suite 1800, Two Bentall Centre
555 Burrard Street
Box 220
Vancouver, BC V7X 1M7

Sent via email: mpickard@sabinagoldsilver.com

Re: The Nunavut Impact Review Board's 2017-2018 Annual Monitoring Report for the Back River Project and Board's Recommendations

Dear Matthew Pickard:

The Nunavut Impact Review Board (NIRB or Board) is hereby releasing its *2017-2018 Annual Monitoring Report for the Back River Project* (Monitoring Report), which includes the 2018 Site Visit Report for the NIRB's monitoring of the Back River Project (Appendix I within the Monitoring Report) and the 2018 Public Information Meeting Summary Report (Appendix III within the Monitoring Report). The enclosed Monitoring Report is based on the NIRB's monitoring activities as set out within the Back River 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)*. This report provides findings that resulted from monitoring of this Project that took place from December 2017 to September 2018.

By way of a motion carried during its regular meeting held in October 2018, the Board has issued the following recommendations to assist Sabina Gold and Silver Corporation (Sabina) in achieving full compliance with Project Certificate No. 007 (the Project Certificate) and to ensure the NIRB has all information necessary to adequately discharge its mandate with respect to provisions within section 12.7 of the *Nunavut Agreement* as such pertain to the Back River Project.

Reporting

The Proponent is required to submit reports as outlined in Project Certificate No. 007. During the 2017-2018 monitoring period, Sabina remained in communication with the NIRB, provided updates and plans to the Board, and demonstrated general compliance with in the requirements of

the Project Certificate, as appropriate for the current development phase of the Back River Gold Mine Project (Appendix I). However, some required plans were submitted late.

Recommendation 1: The Board reminds Sabina Gold and Silver Corporation to track and submit its plans and reports by the deadlines outlined in the Project Certificate and provide updates as required while advancing into the construction phase for the Project.

Vegetation Monitoring

During the 2018 site visit, the Monitoring Officer observed that that some damage (tracks) had occurred on the tundra near the Goose Lake Quarry and at the Marine Laydown Area from the shore to the camp area as well as at some additional areas at the MLA site. Condition 34 and 35 of the Project Certificate direct the Proponent to have a Vegetation Monitoring Program and to develop a progressive revegetation program for areas that are no longer required for operations to be submitted to the NIRB until at least 90 days prior to the start of construction.

Sabina staff noted that they would be developing as part of their Vegetation Monitoring Plan a revegetation and reclamation strategy to the damaged area on the tundra.

Recommendation 2: The Board requests that, until the full monitoring program is operational, Sabina Gold and Silver Corporation provide an outline of its vegetation monitoring program and any associated revegetation activities that were completed this year within the Proponent's 2018 annual report to the Nunavut Impact Review Board.

The Board respectfully requests that for items requiring follow-up action by Sabina Gold a response be provided within the timeline as requested for each of the recommendations.

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 me directly at (867) 983-4609 or johokannoak@nirb.ca.

Sincerely,



Jaida Ohokannoak
Technical Advisor II
Nunavut Impact Review Board

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

Enclosure: The Nunavut Impact Review Board's *2017-2018 Annual Monitoring Report for the Back River Project*