



NIRB File No.: 12MN036

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

October 25, 2019

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 2018-2019 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 *2018-2019 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 Project Certificate No. 007 (Appendix II). 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 October 2018 to September 2019.

By way of a motion carried during its regular meeting held in October 2019, the Board has issued the following recommendations to assist Sabina Gold & Silver Corp. (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.

Vegetation Monitoring

During the 2017-2018 monitoring reporting period the Monitoring Officer reported that some damage (tracks) had occurred on the tundra near the Goose Lake Quarry and at the MLA from the shore to the camp area as well as at some additional areas at the MLA site. Term and Condition 34 of the Project Certificate requires the Proponent to have a Vegetation Monitoring Program that is designed to quantify the potential impacts on vegetation from the Project, including the annual construction / operation of the winter ice roads and trails and to develop a progressive revegetation

program for damaged areas that are no longer required for operations. As construction of the winter ice road had not commenced in the 2017-2018 NIRB monitoring period, the Board subsequently directed Sabina to provide an outline of its vegetation monitoring program and associated revegetation activities that were completed during 2018 within the Proponent's 2018 Annual Report. The Proponent's 2018 Annual does present this information; however, it references a Vegetation Monitoring Plan (Golder 2018) for details that had not yet been submitted to the NIRB. A finalized Vegetation Monitoring Plan was required to be submitted to the NIRB at least 90 days prior to the start of construction of the winter road.

Recommendation 1: The Board requires that Sabina Gold and Silver Corp. provide the Vegetation Monitoring Plan to the Board in accordance with Term and Conditions 34 of the Back River Project Certificate No. 007.

The finalized Vegetation Monitoring Plan is to be provided within 90 days.

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 johokannoak@nirb.ca.

Sincerely,



Jaida Ohokannoak
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 *2018-2019 Annual Monitoring Report for the Back River Project*