

Section	Source	Comment	Action	Justification
<b>Comments on Revised Draft Scope</b>				
Scope, pg. A2  (updated page numbering in Revised <i>Draft</i> Guidelines pg. B-2)	Sabina	Scoping and on-going consultations have identified the need to include the use of BIPR if that project is available. <b>Suggested text revision:</b> "Activities and Facilities: construction and operation of several all-weather and/or winter roads on and between the marine laydown area, Goose Property, and George property used to access infrastructure and transport ore from the mine site to the mill on Goose Property. <u>If the Bathurst Inlet Port and Road Project is available for Sabina's use, the proposed Marine Laydown area and all-weather and winter corridors will be revised to assess this alternative.</u> Marine access, activities and...."	Change Incorporated	
Scope, pg. A4 (updated page numbering in Revised <i>Draft</i> Guidelines pg. B-4)	CARC	Potential Cumulative Effects of Increasing Mining in the Kitikmeot Region: there is no definition of the ecological, geographic or geological area in item 'w'. Recommend that this area be defined (i.e. Slave Geological Province).	No change	Proponent will be required to justify areas included for cumulative and transboundary effects assessment; at this stage, the Board is not in a position to limit the area to be considered by the Proponent in terms of potential cumulative impacts.
Scope, pg. A5 (updated page numbering in Revised <i>Draft</i> Guidelines pg. B-5)	CARC	Transboundary Impacts and Issues: the Bathurst herd is managed in two Territorial jurisdictions. Recommended that management authorities in both jurisdictions should be named (i.e. Aboriginal leaders, stakeholders, and the Governments of the Northwest Territories and Nunavut).	Change made to Section 5.2 Regulatory Regime	The Proponent is required to identify steps it has taken to identify and to consult with all potentially affected parties, including identifying those with which it has consulted, listing any competed and future planned consultations with those parties.
General Comment	GN	The "Draft Scope List for the NIRB's Assessment of the Back River Project" contains socio-economic impacts which must be addressed in the assessment. However, several of these socio-economic impacts do not appear in the "Draft Guidelines for Sabina Gold and Silver Corp.'s Back River Project". In situations where inconsistencies exist between the documents the Government of Nunavut requests such impacts be added to the Draft Guidelines.	No change; content already present	Some of the section titles of the guidelines may not be directly copied from the scope list; however all of the items represented in the scope list are within the guidelines as fit with the details of the document.
<b>Comments on Draft Guidelines</b>				
Glossary, pg. v	Sabina	The definitions for local study area (LSA) and regional study area (RSA) presented within the glossary are appropriate and should be consistent within the text (for example section 7.5.1 v. & vi.). It is important to the Project EA to ensure that each VEC and VSEC has a defined spatial boundary and Sabina is of the opinion that the glossary definition provides that flexibility. Ensure reference to LSA and RSA presented in the glossary is used consistently throughout the Guidelines.	Text added for clarification in the Glossary preamble	Additional clarification provided within preamble to the Glossary terms, noting that further information may be provided and/or requested of the Proponent in order to support the assessment of the Project.
	Sabina	Text at the beginning of glossary indicates that these definitions are specific to Nunavut and to Project. Sabina would suggest adding text to the definition of 'transboundary' to those issues specifically identified by the Minister's decision (Dec 17, 2012). The importance to EIS is to focus assessment on those key components. <b>Suggested text revision:</b> Transboundary impacts - any impact, not exclusively of a global nature, within an area under the jurisdiction of a Party caused by a proposed activity, the physical origin of which is situated wholly or in part within the area under the jurisdiction of another Party (UN, 1991). <u>For the Back River Project, transboundary impacts are outlined by the AANDC Minister's decision (Dec 17, 2012) and focus on the impacts upon affected communities and groups that depend on the Bathurst Caribou herd</u>	Change Incorporated	See changed wording in section 7.12 Transboundary Impacts Assessment (p. 45) clarifying the link between in-text references with glossary definition, as well as incorporation of the Minister's direction regarding transboundary impacts.
Section 1.2 EIS Guideline Development, pg. 1	CARC	Availability of Participant Funding: the Bathurst herd is managed in two Territorial jurisdictions involving Inuit, Dene, Metis and non-beneficiaries to land settlement agreements in both Territories. The Minister's reluctance to provide a mechanism for financial assistance to peoples in both territories dependent upon this herd does not reflect an understanding of the complexity of the impact of this project. Participants should be asked to submit applications for participant funding. The NIRB should advocate on the participant's behalf with the Minister for additional funding.	No change	The NIRB's Screening Decision Report, NIRB File No.: 12MN036 (September 25, 2012) at Item 5: Availability of Participant Funding, at p. 15 clearly identified the issue of participant funding for the Minister. As participant funding is exclusively within the jurisdiction of the Minister and the Minister, in his decision (December 17, 2012) referring the Project Proposal back to the NIRB for review indicated that participant funding will not be available, the NIRB has no jurisdiction to further address this matter.

Section	Source	Comment	Action	Justification
Section 1.5 Reassessment of the Guidelines, pg. 4	Sabina	This section indicates what may trigger a revision to the Guidelines; however, there is a level of uncertainty introduced without an indication of the length of time a Proponent may have before this process is started. Clarify the time frame that would be considered 'reasonable notice to the Proponent'.	No change	Given the variety of circumstances that may trigger the need for the NIRB to reassess, update or otherwise amend the Guidelines, as well as uncertainty as to when during a review the Guidelines may need to be revisited, the NIRB is unable to predetermine what timeframe constitutes “reasonable notice to the Proponent” in any given circumstance. The NIRB does, however, note that the Board is bound to observe the requirements of procedural fairness when determining in any case what would constitute reasonable notice under this section of the Guidelines.
Section 2.3 Traditional Knowledge, pg. 6  (Glossary pg. iv; Section 7.2, pg. 33)	Anne Gunn	In the glossary of the draft guidelines, Inuit Qaujimajatuqangit is defined as “..the traditional, current and evolving body of Inuit values, beliefs, experience, perceptions and knowledge regarding the environment, including land, water, wildlife and people, to the extent that people are part of the environment (QIA 2009).” In the Section on Traditional Knowledge the guidelines are relatively general in their suggestions and appear to relate more to sharing bodies of knowledge. However, GN in applying IQ recognizes a more specific approach. For Example, GN’s 2007 Parnautit: Mineral Exploration and Mining Strategy identified IQ principles which included Piliriqatigiingniq (Ensure people collaboratively work together for a common purpose) Qanuqtuurunnarniq (Encourage people to be resourceful and work to solve problems) and Avatimik Kamattiarniq (In all things have respect for the environment and ensure it is protected). Adaptive management is germane toward sustainable development and will depend on innovative thinking and collaboration to ensure respect for and protection of caribou. Given that it is not just knowledge that will be needed for the documented evaluation of the Sabina project but also values, experience and collaboration, the guidelines should be more specific about what IQ can contribute. This would ensure that the Proponent could demonstrate the application of IQ specifically for caribou migration, monitoring and adaptive management of project effects.	Change incorporated	Section 2.3 second paragraph developed further to outline this issue.
Section 4.5 Data Presentation, pg.12	Anne Gunn	Firstly, the presentation of spatial data for other EISs has included overly detailed baseline maps which greatly increased file sizes. Secondly, the documents provided for NIRB to upload should not be PDF files thoughtlessly divided up even in the middle of a section and with file names that do not hint at the contents. Each volume should have a stand-alone document map which identifies the sections by PDF file names. Appropriate background maps without unnecessary detail and clearly and logically labeled individual PDF files for uploading to NIRB’s ftp site.	Change incorporated	See Section 4.5 in the guidelines for suggested wording update.
	GNWT	The proponent is asked to provide charts, diagrams, photographs and maps within the EIS document wherever appropriate and useful. The GNWT requests the proponent make the spatial files used to construct these maps available to interested parties so development activities occurring on the landscape can be verified. Spatial files would show all project related infrastructure and/or activities in a common and easily readable format (i.e., “.shp” file for ArcGIS).	No change	The NIRB does not require spatial files to be provided at this time. The GNWT may make an application for such information once the DEIS is developed, during the Technical Review stage; however noting that much information may remain proprietary in nature.
Section 5.1 Proponent Information, pg. 14	Sabina	Would suggest revising the bullet to reflect commitments negotiated between Sabina and other parties. Many of the details of these negotiations would remain confidential as determined by the parties involved; however, an agreement would be in place to identify any commitments. <b>Suggested revised text:</b> "Its record in honouring commitments identified <u>within negotiated agreements</u> on environmental and socio-economic matters in the event of planned or premature Project closure, whether temporary or permanent, or due to change of ownership;"	Change incorporated	Added further detail to information requested in Section 5.1.

Section	Source	Comment	Action	Justification
Section 6.0 Project Components and Activities, pg. 16	Anne Gunn	How the project components (road network, airstrip, pits and buildings) are located relative to each other, the natural landscape (lakes and low-lying areas) and any existing caribou trails in the area is a key part of mitigation. How caribou at the two sites encounter specific project structures will influence their responses to them and the existing guidelines do not emphasize this point for caribou. <b>Revised text:</b> How potential impacts to wildlife (e.g., caribou, polar bear and peregrine falcons) have influenced the design of the Project ( <u>including relating existing caribou trails or satellite collar pathways to the sites of roads, trails, tailings, pits, building structures and airstrips</u> ), indicating methods designed to minimize impacts to wildlife, including the geographical location of project components. Special attention should be paid to the influence of raptor habitat on the selection of borrow pits and quarry sites (where applicable);	Change incorporated	Added further detail to information requested in Section 6.1, part vi.
Section 6.5 Economic and Operating Environment, pg. 20	Sabina	Sabina is not part of the governance structure in Nunavut and cannot be held responsible for management of conflict of interest within the current governance regime. Clarify the role of Sabina in developing and implementing conflict of interest policies within the various levels of governance.	No change	This section is clearly stated to be “governance and leadership in terms of the Project development”; consequently, (ii) requires that the Proponent provide a discussion of how the Proponent, in its role as a contributor to governance and leadership in the communities affected by the Project and overall in the territory, intends to address conflict of interest.
Section 6.6.1.2 Mining, Transport and Processing, pg.22 (Section 6.6.3.2, pg. 26 and Section 9.4.6, pg. 84)	Anne Gunn	Dust fall onto vegetation especially lichens (caribou forage) may influence caribou distribution in the vicinity of the mines. Thus dust control is an important part of mitigation. While dust control is practiced at other northern open pit mines, it is still associated with changes in lichens out to 10-15 km which raises the question whether more could be done to reduce the mine’s operational footprint. <b>Revised text:</b> <u>Description of dust suppression technologies and dust suppressants to be used on exposed tailings;</u>	Change incorporated	Added further detail to information requested in Section 6.6.3.2, part vi.
Section 6.6.1.4 Water Supply and Water Treatment Facilities, pg. 23	Sabina	It is unclear if this reference is to either the proposed Marine Laydown Area within the Back River Project or the proposed Bathurst Inlet Port and Road Project. <b>Suggested revised text:</b> "...with the Project, including facilities at the mine site(s), <u>Marine Laydown Area</u> including...."	Change incorporated	Reference in Section 6.6.1.4 and additional areas in document updated as applicable.
Section 6.6.2 Mine Site Tank Farms, Bathurst Inlet Port and Storage Facilities, pg. 25	Sabina	It is unclear if this reference is to either the proposed Marine Laydown Area within the Back River Project or the proposed Bathurst Inlet Port and Road Project. <b>Suggested revised text:</b> "6.6.2 Mine Site Tank Farms, <u>Marine Laydown Area</u> and Storage Facilities."	Change incorporated	See previous comment.
Section 6.6.6 Air Transportation, pg. 30	Sabina	Sabina does not currently intend to utilize policing services to support the Back River Project. <b>Suggested revised text:</b> "v. Description of the anticipated use/reliance on <u>emergency</u> services, <u>during normal and emergency situations</u> ; and""	Change incorporated	
Section 7.4 Use of Existing Information, pg. 35	Anne Gunn	Through the existing mines such as the open pit diamond mines (Ekati and Diavik) in the NWT, there is considerable current experience on baseline, assessment, monitoring and mitigation from operational mines. <b>Revised text:</b> For example, ‘lessons learned’ already exist in relation to previous and/or currently active projects in Nunavut (e.g. the Meadowbank Gold Mine, the Jericho Diamond Mine, the Doris North Gold Mine, <u>Ekati and Diavik open pit diamond mines</u> , etc.) and this information should be captured by the Proponent.	Change incorporated	Text updated to more accurately outline both Nunavut and Northwest Territory examples.

Section	Source	Comment	Action	Justification
Section 7.5.1 Spatial Assessment Boundaries, pg. 35	GNWT	The Proponent should clearly distinguish between the Project Development Area (PDA) or immediate project footprint (i.e. project infrastructure such as facilities, buildings, roads, and access), the Local Study Area (or LSA) (identified by the description given in section ‘v. Local Study Area (LSA’), and the Regional Study Area (RSA). This allows interested parties to more accurately identify the different components of the Project, and the Proponent’s intended study areas around their immediate project footprint. The Proponent should also include aspects of the socio-economic environment in terms of transboundary implications in the RSA. <b>Suggested text revision:</b> vi) Regional Study Area (RSA): the Regional Study Area shall be defined as the area within which there exists the potential for direct, indirect, and/or cumulative biophysical and socio-economic effects. This area includes lands, communities, and portions of Nunavut and other regions of Canada that may be relevant to the assessment of widespread effects of the Project. The Proponent is advised to duly consider the transboundary implications of impacts to be identified as VECs/VSECs as a result of air transportation, marine shipping, <u>employment and business</u> for the Project.	Change incorporated	The Proponent is advised to duly consider the transboundary implications of impacts to identified VECs/VSECs especially as defined by the Minister to include the Bathurst caribou calving ground and the communities and groups who depend upon this resource. See also the response to previous comment from Sabina regarding 7.5.1
	Sabina	The definitions for local study area (LSA) and regional study area (RSA) presented within the glossary are appropriate and should be consistent with text (for example section 7.5.1 v. & vi.). It is important to the Project EA to ensure that each VEC and VSEC has a defined spatial boundary and Sabina is of the opinion that the glossary definition provides that flexibility. <b>Suggested text revision</b> to be consistent with the glossary: "The following general spatial boundaries are suggested: <u>Local Study Area (LSA): the Local Study Area shall be defined as that area where there exists the reasonable potential for immediate impacts due to Project activities, ongoing normal activities, or to possible abnormal operating conditions.</u> "	No Change	The Proponent should refer to the definitions within the glossary to provide a generic description of the Board’s expectations as well to the in-text references which provide additional clarification, direction and guidance.
	Sabina	The definitions for local study area (LSA) and regional study area (RSA) presented within the glossary are appropriate and should be consistent with text (for example section 7.5.1 v. & vi.). It is important to the Project EA to ensure that each VEC and VSEC has a defined spatial boundary and Sabina is of the opinion that the glossary definition provides that flexibility.	No action taken	The Proponent is expected to provide and justify the boundaries to be considered in its assessment of each VEC and VSEC. The LSA and RSA are provided within the Guidelines as a suggested approach. Shipping associated with the Back River proposal is subject to NIRB’s assessment per 12.12.2 of the NLCA. The recommendation that shipping be included within the LSA is consistent with the Board’s understanding of this requirement.
	Sabina	<b>Suggested text revision</b> to be consistent with the glossary. The following general spatial boundaries are suggested: " <u>vi. Regional Study Area (RSA): the Regional Study Area shall be defined as the area within which there exists the potential for direct, indirect and/or cumulative biophysical and socio-economic effects.</u> "	Clarification provided; RSA wording revised	RSA wording revised to: ...The Proponent is advised to duly consider the transboundary implications of impacts to identified VECs/VSECs especially as defined by the Minister to include the Bathurst caribou calving ground and the communities and groups who depend upon this resource.
Section 7.5.2 Temporal boundaries, pg. 37	Sabina	Decommissioning and closure of the project will depend on what is agreed to by various regulators, land holders and the communities in addition to what will be economically and environmentally feasible. <b>Suggested text revision:</b> "...the Project has been decommissioned and abandoned, once the site has been reclaimed and returned as much as possible to its natural state <u>or to the final closure conditions agreed to by regulators, landowners and communities.</u> "	Change incorporated	
Section 7.10 Impacts of the Environment on the Project, pg. 43	Sabina	Additional text is needed to clarify that this is within the Project area and the effect of climate change to the Project. <b>Suggested revised text:</b> "v. impacts from climate change on sensitive ecosystem features within the terrestrial, freshwater and marine ecosystems <u>within the Project area</u> "	Change incorporated	Added further detail to information requested in Section 7.10, part v.



Section	Source	Comment	Action	Justification
Section 7.11 Cumulative Effects Assessment, pg. 44	GNWT	This description should be expanded or clarified to ensure that the cumulative effects assessment is completed for the RSA, not just the direct project area. <b>Suggested text revision:</b> iv) Consideration of effects on VECs and VSECs: An effective CEA will allow the Proponent to more accurately assess how the interaction of impacts from the various Project components and activities, and those from other past, present and reasonably foreseeable projects (including exploration) <u>throughout the RSA</u> might impact in a cumulative fashion on selected VECs/VSECs.	Change incorporated	Alternate wording suggested to ensure that the instructions are directing the discussion to be inclusive without pre-determining the extent of area discussed.
	Anne Gunn	While cumulative effects management and mitigation for caribou is largely outside the Proponent's immediate control, it is part of assessing environmental effects for the Proponent to demonstrate the sustainable context of their project for caribou and the continued access to caribou for harvesting. However, while the guidelines require that the Proponent discuss mitigation measures and identify the responsible parties, given the decline of caribou herds especially the Bathurst herd, mitigation actions for cumulative effects need additional emphasis in the guidelines. <b>Revised text:</b> Discuss the mitigation measures that are technically and economically feasible, and determine the significance of the cumulative effects. If any impact is identified and verified beyond the Proponent's sole responsibility or capacity, the Proponent shall make best efforts to identify <u>possible mitigation measures (such as trade-offs, off-setting and limits) for</u> other responsible parties in order to mitigate the impact collectively.	Change incorporated	Text updated as: "Discuss the mitigation measures that are technically and economically feasible, and determine the significance of the cumulative effects. If any impact is identified and verified beyond the Proponent's sole responsibility or capacity, the Proponent shall make best efforts to identify how its <u>mitigation measures may contribute toward any collective mitigation undertaken by</u> other responsible parties".
Section 7.12 Transboundary Impacts Assessment, pg. 45	GNWT	There are a number of areas where the GNWT anticipates transboundary effects. The Draft EIS Guidelines should clarify whether transboundary impacts should be considered within a single transboundary section, or should be included throughout the document where the impact assessments are separated by topic. The GNWT <b>also suggests the wording below</b> to clarify transboundary effects: Transboundary impacts, for the purpose of the current Guidelines, are defined as those effects linked directly to the activities of the Project inside the NSA, which occur across provincial, territorial, international boundaries or may occur outside of the NSA. <u>Consideration may also be given to indirect effects related to the activities of the Project in the RSA.</u> The proponent shall give due consideration to the potential for transboundary impacts which may <u>be a</u> results from interactions between the effects of the Project in the NSA...with specific consideration given to the potential for transboundary impacts associated with marine shipping on marine mammals, birds and their habitat, <u>as well as</u> the <u>impact of Project infrastructure and transportation on the</u> large migration range of land mammals such as caribou, <u>and socio-economic impacts.</u>	Change incorporated	Section developed further to more accurately reflect input from all interested parties.
Section 7.15 Certainty, pg. 47	Anne Gunn	Certainty (and uncertainty) is often the cause of concern if not confusion in environmental assessments. The uncertainty has a number of different sources some of which can be addressed. The first step is to acknowledge and describe sources of uncertainty and how they can be addressed. <b>Revised text:</b> The Proponent shall also assess the degree of uncertainty associated with each predicted effect. <u>The underlying causes and sources of uncertainty should be described.</u> The level..."	Change incorporated	
Section 8.1.1.1 Air Quality Baseline Data, pg. 48	Sabina	Industry standard is to use data collected through the Environment Canada network. <b>Suggested text revision:</b> "i. Background ambient air quality data <u>collected in the LSA and RSA</u> including airborne dust (TSP, PM <sub>10</sub> and PM <sub>2.5</sub> )	No change	The Proponent is expected to provide baseline air quality data for the LSA and RSA in order to support future impact assessment.
Section 8.1.11.2 Terrestrial Wildlife and Wildlife Habitat Impact Assessment, pg. 61	CPAWS-NWT	CPAWS-NWT recommends helping ensure that the transboundary implications of the project are assessed and understood by potentially affected communities in both Nunavut and the NWT by <b>adding the following bullet:</b> <u>xiii. Potential transboundary impacts of project-specific activities and cumulative impacts associated with other past, existing, and foreseeable projects, which could affect terrestrial wildlife species with transboundary ranges (e.g. Bathurst caribou).</u>	No change; content already present	See updated text in Section 7.12 Transboundary Impacts Assessment. This section captures the requirement of the Proponent to address impacts as requested by CPAWS-NWT.

Section	Source	Comment	Action	Justification
Section 8.1.12.2 Birds and Bird Habitat Impact Assessment, pg. 64	Sabina	Sabina is of the opinion that shipping within the international/normal shipping channels within the NSA is outside the immediate area of the Project and should not be included in the LSA or RSA for the Back River Project. The text should be revised to reflect. <b>Suggested text revision:</b> "xi. <del>Potential effects of shipping on coastal and marine birds and habitat, as well as potential disturbance, particularly possible spills,</del> on key migratory birds and habitat areas and sanctuaries in proximity to shipping routes."	No change	Shipping associated with the Back River proposal is subject to NIRB's assessment per 12.12.2 of the NLCA. The recommendation that shipping be included within the LSA is consistent with the Board's understanding of this requirement.
Section 8.1.13.1 Marine Environment Baseline Information, pg. 64	Sabina	Sabina is of the opinion that shipping within the international/normal shipping channels within the NSA is outside the immediate area of the Project and should not be included in the LSA or RSA for the Back River Project. The text should be revised to reflect. <b>Suggested text revision:</b> "i. Description of marine physical processes and currents including the coastal environment, biological diversity and composition, and associated interactions in the LSA and RSA, <del>including the proposed shipping route(s) within the NSA;</del> "	No change	Shipping associated with the Back River proposal is subject to NIRB's assessment per 12.12.2 of the NLCA. The recommendation that shipping be included within the LSA is consistent with the Board's understanding of this requirement.
Section 8.2.2.2 Employment Impact Assessment, pg. 68	GN	In-migration from outside of the territory will have an increased demand on existing overwhelmed housing stock and therefore negative effects on health and wellbeing. The Draft EIS Guidelines do call for a discussion of impacts related to migration, but do not specifically reference southern hires, and migration from outside of Nunavut. It is necessary to gather as complete an understanding of expected migration as possible in order to determine whether significant adverse effects on housing are likely to occur. The GN requests that <b>the following be added:</b> <u>"Discussion of the potential for southern hires to take up residency in the territory"</u>	Change incorporated	Information not added to Section 8.2.2.2 as fits more appropriately in Section 8.2.5.2.i. Clarification provided in regards to the sources of migration (from outside of Nunavut to include labour pools from the rest of Canada and the world).
	GN	Rental rates are assessed annually; if a resident's income changes over the year, rent is adjusted accordingly. By specifically requesting information on income changes as they pertain to public housing rental rates. <b>The following statement should also include</b> the evaluation of housing rental rates and payments; Bullet iv. <u>"Evaluation of the possible effect of changes in income earnings on patterns of savings, expenditure and consumption values"</u>	Change incorporated	Included in Section 8.2.2.3 as a topic for discussion as company may not be able to affect either rental rates or individual spending habits, but should discuss as part of providing a complete assessment.
Section 8.2.6.2 Traditional Activity and Knowledge Impact Assessment, pg. 71	CPAWS-NWT	Recommends <b>adding the following bullet</b> to help ensure that the transboundary implications of the project are assessed and understood by potentially affected communities in both Nunavut and the NWT: <u>x. Potential transboundary impacts of project-specific activities, and cumulative impacts associated with other past, existing, and foreseeable projects, on communities that depend on wildlife resources with transboundary ranges (e.g. Bathurst caribou).</u>	No change; content already present	See updated text in Section 7.12 Transboundary Impacts Assessment. This section captures the requirement of the Proponent to address impacts as requested by CPAWS-NWT.
Section 8.2.8.1 Heritage Resources Baseline Information, pg. 72	Sabina	Locational information pertaining to archaeological sites is protected by a Data Licence Agreement issued by the Government of Nunavut. A condition of the data license stipulates that archaeological sites will not be plotted on a map which could be made available to the public unless the scale of the map is less than or equal to 1:2,000,000 and the positional accuracy has been randomized. The requirement that sites be depicted on a map should be removed or revised to reflect the Data Licence Agreement. <b>Suggested text revision:</b> "Each site shall be described on a map <u>that complies with the Data License Agreement</u> with a corresponding scale."	Change incorporated	
Section 8.2.10.1 Community Infrastructure and Public Services Baseline Information, pg. 75	GNWT	The GNWT would like to ensure the proponent include the expected impacts [as described in Section 8.2.10.1 (iii)] on the local, regional and territorial health systems of the Northwest Territories in this assessment. This assessment can either be included in this section of the EIS, or under section 7.12 (Transboundary Impacts). The proponent should provide information on their medical evacuation plans in this section.	Change incorporated	See updated text in Section 7.12 Transboundary Impacts Assessment.
Section 8.2.10.2 Community Infrastructure and Public Services Impact Assessment, pg.75	GN	The GN requests the <b>following assessment be added</b> under Impact Assessment: <u>"An assessment of the potential increase in demand for housing, both public and private"</u> . Including this assessment of the potential increase in demand for housing will assist in identifying potential project housing needs that may arise as a result of the project. It will also allow the Proponent to recognize and plan for the potential need for community staff housing.	Change incorporated	Added further detail to information requested in Section 8.2.10.2.

Section	Source	Comment	Action	Justification
Section 9.3 Monitoring and Mitigation Plans, pg. 79	Sabina	Monitoring programs for the Back River Project will be developed to assess mitigation measures implemented and compliance with issued authorizations. It may be difficult to have all monitoring programs provide data to a regional monitoring program. <b>Suggested text revision:</b> "In addition, <u>where possible</u> , monitoring plans should be designed so that results from these programs can be coordinated with ongoing regional initiatives or programs with relevant government organizations, or regional authorities."	Change incorporated	
Section 9.4.10 Roads Management Plan, pg. 86	GNWT	The proponent is directed to consider and reference appropriate seasonal closure of mine and road activity from late May to late July in the EIS as proposed roads and project facilities fall within the post-calving ranges of the Bathurst herd and the spring and summer migration routes of the Beverly and Ahiak herds. In addition to the components of the plan listed in the draft guidelines, the proponent should address <u>road access and potential effects</u> . Examples of such effects may be increased access for harvesting and traditional activities, and encroachment of non-traditional land users onto the traditional lands of local harvesters. A discussion of such effects, and a plan to mitigate for them, is necessary for the protection of wildlife, wildlife habitat, and traditional use. To mitigate these effects, the proponent should develop, in collaboration with the appropriate partners, a 'Road Access Management Plan'.	No change	As no communities are nearby the proposed road facility, it is unlikely that the development of this infrastructure would facilitate public and harvester access.
Section 9.4.11 Shipping Management Plan, pg.88	Sabina	Sabina is not planning to ship into communities. Remove this bullet.	Text revised in Section 9.4.11, part xiii.	Recognizing that Sabina does not intend to ship into communities, the need to address potential movement of illicit and controlled substances via project shipments remains a consideration for the Board and text has been revised in Section 9.4.11, part xiii.
Section 9.4.17 Wildlife Mitigation and Monitoring Plan, pg. 91	GNWT	The GNWT requests any wildlife mitigation and monitoring plans for transboundary species be developed in collaboration with cross-jurisdictional partners including the GNWT, relevant and affected Aboriginal organizations in the NWT, current and proposed developers within the Slave Geological Province, and other interested parties.	No change; content already present	Last paragraph of Section 9.3 Mitigation and Monitoring Plans outlines requirement for Plans to allow for collaboration where possible.
	GNWT	Further, the GNWT recommends Sabina separate mitigation measures and local-scale monitoring from larger-scale monitoring activities. In the NWT, this is achieved by having proponents develop two separate documents: a Wildlife and Wildlife Habitat Protection Plan (WWHPP), and a Wildlife Effects Monitoring Program (WEMP). This separation allows for more effective adaptive management as the results of the WEMP (which tests both the predictions laid out in the developer's EIS and the effectiveness of the mitigation measures in the WWHPP), can be used to trigger adaption of mitigation measures in the WWHPP, and/or monitoring methods in the WEMP. Please see definitions of WWHPP and WEMP provided in this submission by the GNWT.	No change; content already present	The NIRB requires the Proponent to outline the effects monitoring not only for wildlife, but for all part of the environment, and so requires that these company policies, management strategies, thresholds, and adaptive management measures be outlined in the Environmental Management Plan and Environmental Protection Plan as referenced in Section 9.1 and 9.2 of the guidelines, respectively. How these apply to the VEC specific information (i.e., wildlife and caribou) would be elaborated upon in the Wildlife Mitigation and Monitoring Plan.
	Anne Gunn	The project is within the part of the annual ranges where cows and young calves will often be clumped in large groups (early post-calving aggregations) this imposes particular problems for sample design. The guidelines require the environmental data to include a measure of their statistical variability. However, the variability of the data (variance etc.) also needs the Proponent to describe the statistical sensitivity of the baseline and monitoring techniques. If the method is imprecise and correspondingly, the measurement endpoint has a high variance, then detecting trends or changes will be difficult or not possible. This becomes especially critical in monitoring and adaptive management design and whether narrative statements or quantitative thresholds are to be used for triggering changes to mitigation measures. <b>Revised text:</b> bullet viii. Description of how indicators, sampling design, methodology and analysis <u>including statistical power analyses</u> will be appropriate and adequate to detect spatial and temporal project-related impacts on wildlife. <u>The Proponent should include a description of the statistical power of its baseline and monitoring techniques (accuracy and precision). If the statistical power is low then the Proponent should describe sampling strategies to increase statistical power.</u>	No change	Under the previous wording, this method may be employed by the Proponent to prove the rigor of their statistical analysis, but it may also be limiting as it pre-directs the Proponent to using statistical analysis for impact assessment which may preclude other types of quantitative incorporation (i.e., impact analysis based on an agreed-upon finite value, or the use of IQ to determine management practices). Where statistical analysis is used by the Proponent to support its conclusions regardless of VEC or VSEC, it has been outlined in Section 7.7.1 the requirements of statistical standards.

Section	Source	Comment	Action	Justification
Section 9.5.5 Human Resources Plan, pg. 95	GN	Under this section the GN <b>requests the following addition:</b> <u>“An assessment of anticipated migration, and how any increased demands on housing will be mitigated”</u> . The addition of the above information will assist the GN to better understand what the housing needs will be for potentially impacted communities located in the study region. The GN is unable to inform communities of projected needs without a thorough understanding of what demand for housing will be, and what mitigation will be provided by the Proponent.	Change incorporated	Request included in Section 8.2.10.2 Community Infrastructure and Public Services to encourage discussion of this item for both direct and indirect impacts.
Section 9.7 Follow-up and Adaptive Management Plans, pg. 97	Sabina	Sabina requests clarification on the intent of this Plan as monitoring plans typically include a responsive/adaptive component to assess predicted environmental impacts and the effectiveness of the implemented mitigation measures. Also bullet ii) indicates an outline of enforcement and penalties needs and this is not usually in a "plan" but part of authorizations subject to inspections. Bullet vi) refers to sourcing funds to implement adaptive management plan and it is unclear how a plan would outline funding measures for a specific monitoring plan within Sabina. This suggests that the adaptive management plan is for an external group. Clarify intent of this plan.	Change incorporated	See updates to wording in bullet ii and vii.
	Anne Gunn	For caribou, given their currently reduced numbers, ensuring that any project effects are minimized will require stringent mitigation and monitoring. In the case for caribou, it is not just possible mitigation failure but inadequate mitigation that should be included. <b>Revised text:</b> “In order to offset the likelihood of mitigation failure <u>or inadequate according to previously selected criteria</u> and the potential severity of the consequences, the Proponent shall formulate a process through which the information related to effectiveness of mitigation measures is analyzed and associated adaptive measures would be employed in the environmental management system.”	Change incorporated	Added further detail to information requested in Section 9.7.