



**NIRB File No.: 12MN036**  
NWB File No.: 2AM-BRP  
AANDC File No.: N2012T0025

February 11, 2014

To: Back River Distribution List

*Sent via email*

**RE: Conformity Determination for Sabina Gold & Silver Corp.'s Draft Environmental Impact Statement Submission for the Back River Project and Commencement of the NIRB's Technical Review Period**

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Dear Parties:

On January 21, 2014 the Nunavut Impact Review Board (NIRB or Board) acknowledged receipt of Sabina Gold & Silver Corporation's (Sabina; the Proponent) Draft Environmental Impact Statement (DEIS) submission for the Back River Project (the Project). The Board initiated an internal review of the DEIS to determine whether or not it conformed to the EIS Guidelines issued to Sabina on April 30, 2013<sup>1</sup>. As Sabina had requested that the NIRB and the Nunavut Water Board implement their coordinated process for Reviews and Water Licensing, the NIRB has also consulted with the Nunavut Water Board (NWB) regarding sections of the EIS Guidelines and the DEIS relating to the draft water licence application provided within the January 21, 2014 submission.

The NIRB hereby accepts Sabina's submission as a DEIS and commences the technical review period. Sabina's Back River Project DEIS submission can be accessed from the NIRB's online public registry at the following location:

<http://ftp.nirb.ca/02-REVIEWS/ACTIVE%20REVIEWS/11MN034-AEM%20MELIADINE/2-REVIEW/06-DRAFT%20EIS%20%26%20CONFORMITY%20REVIEW/03-DEIS%20APRIL%202013/>.

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<sup>1</sup> NIRB Guidelines for the Preparation of an Environmental Impact Statement for Sabina Gold & Silver Corp.'s Back River Project (NIRB File No. 12MN036). Available from the NIRB's online public registry: <http://ftp.nirb.ca/02-REVIEWS/ACTIVE%20REVIEWS/12MN036-SABINA-BACK%20RIVER/02-REVIEW/04-SCOPING%20%26%20GUIDELINES/02-EIS%20GUIDELINES/04-FINAL/>

### ***The Technical Review Process***

As part of the NIRB's Review of the Back River project, the technical review process is meant to provide a detailed review of the DEIS document with the intent of analyzing the quality of the information presented by the Proponent. Parties are invited to review the DEIS submission and develop technical review comments which address the following:

- Determination of whether Parties agree/disagree with the conclusions in the DEIS regarding the alternatives assessment, environmental impacts, proposed mitigation, significance of impacts, and monitoring measures – and reasons to support the determination;
- Determination of whether or not conclusions in the DEIS are supported by the analysis – and reasons to support the determination;
- Determination of whether appropriate methodology was utilized in the DEIS to develop conclusions – and reasons to support the determination, along with any proposed alternative methodologies which may be more appropriate (if applicable);
- Assessment of the quality and presentation of the information in the DEIS; and
- Any comments regarding additional information which would be useful in assessing impacts – and reasons to support any comments made.

### ***NIRB-NWB Coordination***

The NIRB and the NWB continue to coordinate the respective assessment and licensing aspects of the Back River project proposal during the NIRB's Review process and the NWB's consideration of the Type A Water Licence application as described in the Detailed Coordinated Process Framework<sup>2</sup>.

Upon receipt of technical review comments, the NIRB will forward copies of any comment submissions received which pertain to the Draft Type A Water Licence Application to the NWB for its consideration (see enclosed Anticipated Timeline).

### ***NIRB Call for Information Requests***

To facilitate the development of technical review comments by parties, the NIRB invites interested parties to provide the NIRB with Information Requests (IRs) directed to the Proponent and/or other parties involved in the assessment of the Back River DEIS. It should be noted that IRs are not meant to serve as technical review comments, but rather should identify information gaps within the DEIS that need to be addressed so that parties can develop their respective technical review comments. Please note that parties are encouraged to review [Appendix A](#) which provides the NIRB's suggested format for the development of IRs and additional clarification regarding the information that must be included with submissions as follows:

- A clear reference to the volume, document, section, and/or page number in the DEIS where relevant information may be found, if applicable

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<sup>2</sup> The NIRB/NWB Detailed Coordinated Process Framework is available from the NIRB's online public registry: <http://ftp.nirb.ca/02-REVIEWS/NIRB%20NWB%20COORDINATION/>

- To whom the IR is directed;
- Identification of the issue and the specific information being requested;
- The concern associated with the issue and need for information; and
- A clear rationale of the issue and information's importance to the impact assessment of the proposed project.

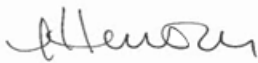
The next steps in the NIRB's Review of the proposed Back River project have been outlined as follows for the information of parties:

- Submission of Information Requests (IRs) directly to the NIRB by interested parties on or before **5:00 pm MT, Thursday March 13, 2014**.
- After considering all IRs and making decisions regarding their suitability, the NIRB will forward all appropriate requests to the Proponent (and other parties if applicable) on or before **Tuesday March 18, 2014**.
- Upon forwarding IRs to the appropriate parties, the NIRB may set a timeframe for the Proponent and other parties if applicable, to respond with an IR response package.
- Upon receipt of the IR response package(s), all parties will be given **60 days** for submission of technical review comments.
- The NIRB may schedule community information session meetings in communities potentially affected by the proposed Back River project, and will provide a minimum of 25 days' notice for these events.

Once again, the NIRB requests that all interested parties submit their Information Requests to the NIRB at [info@nirb.ca](mailto:info@nirb.ca) or by fax to (867) 983-2594 on or before **5:00 pm MT, Thursday March 13, 2014**.

If you have any questions or require further clarification regarding the NIRB's Review of the Back River Project, please contact Tara Arko, Technical Advisor, at (867) 983-4611 or via email at [tarko@nirb.ca](mailto:tarko@nirb.ca).

Sincerely,



Amanda Hanson  
Director, Technical Services  
Nunavut Impact Review Board

cc: Matthew Pickard, Sabina Gold & Silver Corp.  
David Hohnstein, Nunavut Water Board

Attached: Appendix A – Suggested Format for Information Requests

Enclosed: Anticipated Timeline for the NIRB's Review of Sabina's proposed Back River Project

## APPENDIX A: SUGGESTED FORMAT FOR INFORMATION REQUESTS

### *Format and File Size*

Parties must provide submissions in a fully functional, electronically searchable Word or PDF file. Noting the current constraints with respect to internet bandwidth and speed, the NIRB requests that all documents be submitted as files no larger than 5 MB.

### *Information Requests*

The purpose of Information Requests is to identify information gaps or areas of uncertainty within the DEIS that need to be addressed so that parties can develop their respective technical review comments. Information requests can originate from, and be directed to, any of the parties involved in the assessment. Submissions must identify what specific information is required, and outline why the information required is necessary to facilitate the party's technical analysis of the DEIS or the potential impacts of the project. Upon receiving the Information Requests, the NIRB will consider each request, decide on its suitability, and then forward all appropriate requests to the Proponent and other parties as applicable. The NIRB will assess the suitability of each request in terms of what requirements are appropriate at this phase of the review process, and must balance these requirements with information that may be requested or issues raised as part of technical review comments or at a more advanced stage of the Review.

Parties are asked to ensure that Information Requests address the points set out below:

<b>IR Source:</b>	Identify the organization/department/intervenor proposing the request.
<b>IR Number:</b>	Each specific Information Request must be numbered to allow for effective cross-referencing of the submission.
<b>IR Directed To:</b>	Clearly identify the organizations/departments/agencies to which the IR is directed (e.g., the Proponent and/or specific organization(s) of whom the information is requested).
<b>Subject:</b>	Identify the issue; list the general subject or topic associated with the request (e.g., monitoring of sediment quality).
<b>Reference:</b>	Provide a clear reference to any applicable volume, document, section, and/or page number in the Draft EIS where information relevant to the request may be found.
<b>Issue/Concern:</b>	Provide background information and justification for the request. The issue/concern should identify any shortcomings of available information, concerns associated with the issue and how the requested information is relevant to the technical analysis of information within the DEIS. A clear rationale of the issue's importance to the formulation of technical review comments and the overall impact assessment of the proposed project is required.

<b>Information Request:</b>	Specifically state the question and/or outline the specific information being requested of the Proponent or organization. Separate items requested should be appropriately numbered in order to track the provision of responses.
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