

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

April 7, 2014

Agnes Simonfalvy Avatiliriniq Coordinator Government of Nunavut P.O. Box 2410 Iqaluit, NU X0A 0H0

Sent via email: asimonfalvy@gov.nu.ca

RE: <u>Information Requests received from Parties regarding Sabina Gold & Silver Corp.'s</u>

<u>Draft EIS for the Back River Project</u>

Dear Agnes Simonfalvy:

On February 11, 2014 the Nunavut Impact Review Board (NIRB or Board) initiated the public technical review of the Draft Environmental Impact Statement (DEIS) submitted by Sabina Gold & Silver Corporation (Sabina or the Proponent) for the Back River project proposal by requesting that interested parties submit Information Requests (IR) to facilitate their technical review of the DEIS.

On or before March 24, 2014 the NIRB received IR submissions from the following parties:

- Kitikmeot Inuit Association 140 IRs
- Government of Nunavut 42 IRs
- Government of Canada 152 IRs
- Government of Northwest Territories 13 IRs
 - o 1 IR directed to the Government of Nunavut
- Lutsel K'e Dene First Nations 5 IRs
- Yellowknives Dene First Nations 13 IRs
- Sabina Gold & Silver Corporation 3 IRs
 - o 3 IRs directed to Federal and Territorial government agencies and departments

All submissions are available from the NIRB's online public registry at the following link:

http://ftp.nirb.ca/02-REVIEWS/ACTIVE%20REVIEWS/12MN036-SABINA-BACK%20RIVER/02-REVIEW/07-IRS%20%26%20TECHNICAL%20REVIEW/02-INFORMATION%20REQUESTS/.

The Board requests that the Government of Nunavut review the IR submissions as referenced above and supply the NIRB with an indication regarding its ability to respond to the IRs. The NIRB recognizes that a small number of the IRs received are somewhat outside the scope of the NIRB's Review for the Back River project and may not be explicitly necessary for the formulation of technical review comments; the NIRB has not requested a response to these IRs, as outlined in Appendix A.

The NIRB respectfully requests that indications regarding the anticipated timelines for responses to IRs be submitted directly to the Board at info@nirb.ca or by fax to (867) 983-2594 on or before April 22, 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.

Sincerely,

Amanda Hanson

Director, Technical Services

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Nunavut Impact Review Board

cc: Back River Distribution List

David Hohnstein, Nunavut Water Board

Attached: Appendix A - Information Requests Identified by the NIRB as Requiring a Modified or No Response

APPENDIX A: INFORMATION REQUESTS IDENTIFIED BY THE NIRB AS REQUIRING A MODIFIED OR NO RESPONSE

In the table below the NIRB has attempted to identify those Information Requests (IRs) which either require a modified response, or which do not appear to meet the criteria to qualify as an IR required for the development of technical review comments as part of this stage of the Review for the Back River project proposal. Generally, each of the following items appeared to be either: editorial comments on content; issues more appropriately addressed through technical review comments; requests for data to facilitate independent analysis; or it was unclear to the NIRB how the IR in question would facilitate development of technical review comments (e.g. comments on items outside of the scope of the NIRB's Review).

While the Government of Nunavut is not requested to address the following items within its IR Response Package, the NIRB recommends that it thoroughly review each item and make its own determination regarding the need for or its ability to, provide an appropriate response.

| Commenting | Information Request | NIRB Rationale |
|-----------------|---|---|
| Agency & IR No. | | |
| KIA-6 | Details on the proposed research collaboration between the Government of Nunavut DOE and proponent is sought. | Do not meet criteria for IRs — information requested is not within the scope of the NIRB's Review. |
| GNWT-7 | To Government of Nunavut: 1) Please provide a summary of wildlife monitoring and cumulative effects initiatives being undertaken by the GN and wildlife co-management partners in the Kitikmeot region. 2) Is the GN willing to participate in regional initiatives including the Bathurst Range Planning process and the development of a regional cumulative effects monitoring programming for wildlife and wildlife habitat in the Slave Geological Province? 3) Is the GN willing to discuss potential collaborative approaches for developing new processes or aligning existing programs and processes to address cumulative impacts to other shared caribou herds and species in the region? 4) Is the GN willing to include GNWT in discussions with Sabina regarding options for research and monitoring related to cumulative effects assessment and management of shared species? | Items 2, 3, and 4 do not meet criteria for IRs – information requested is not within the scope of the NIRB's Review; however the Government of Nunavut may choose to provide a response to these questions with its response to item 1. |