



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

May 7, 2014

Michael Mohammed
Senior Environmental Assessment Coordinator
Environment Canada
P.O. Box 1870
Iqaluit, NU X0A 0H0

Sent via email: michael.mohammed@ec.gc.ca

RE: Additional Information Requests received from Environment Canada regarding Sabina Gold & Silver Corp.'s Draft EIS for the Back River project proposal

Dear Michael Mohammed:

On April 25, 2014 the Nunavut Impact Review Board (NIRB or Board) received email correspondence from Environment Canada which provided additional information requests in regards to the Draft Environmental Impact Statement (DEIS) submitted by Sabina Gold & Silver Corporation (Sabina or the Proponent) for the Back River project proposal. Environment Canada's April 25, 2014 submission will be considered as an official submission to the NIRB's Review of the Back River project and has been made available from the NIRB's online registry with information requests submitted by other agencies and interested parties, 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/>.

Please note that in order to maintain the integrity of the NIRB's Review process, it is important that parties' requests are vetted through the NIRB where possible. The Board does have discretion to consider requests for extensions to submission deadlines or to consider late submissions where it deems such requests to be reasonable.

While the information requests were provided directly to the Proponent by Environment Canada, the NIRB notes for the information of all parties that in reviewing the submission (see Appendix A), the requests appear to be technical in nature. As such, the NIRB will not require Sabina to provide a response to these additional information requests within its information response

package under the current timeline commitment of June 11, 2014. This being the case, the Board notes that this does not limit Sabina from providing a response to Environment Canada as it may deem appropriate.

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

Sincerely,



Tara Arko
Technical Advisor
Nunavut Impact Review Board

cc: Back River Distribution List
Matthew Pickard, Sabina Gold & Silver Corporation
David Hohnstein, Nunavut Water Board
James Neary, Aboriginal Affairs and Northern Development Canada
Georgina Williston, Fisheries and Oceans Canada
Kathleen Cavallaro, Natural Resources Canada
John Cowan, Transport Canada
Tineka Simmons, Northern Projects Management Office

APPENDIX A:
ADDITIONAL INFORMATION REQUESTS IDENTIFIED BY ENVIRONMENT CANADA

In the table below the NIRB identified Environment Canada's additional Information Requests for incorporation into the NIRB technical review. While the Proponent will not be explicitly required to address the following items within its IR Response Package, the NIRB strongly recommends that Sabina thoroughly review each item and make its own determination regarding the need for or its ability to, provide an appropriate response.

IR No.	Information Request	NIRB Rationale
Kitikmeot Inuit Association		
EC-39	Environment Canada requests the opportunity to review any information that may exist pertaining to strategic booming of Bathurst Inlet that would be integral to any tactical spill response methods for controlling and containing the likely northward dispersion of spilled diesel fuel for both the 5 ML and 20 kL diesel spill-to-water scenarios that are indicated in the 2013 Bathurst Inlet Marine Diesel Fuel Spill Modelling, Appendix V9-3A of Volume 9: Methodology, Effects of Environment on Project, Accidents and Malfunctions.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
EC-40	Environment Canada notes that the Explosives Management Plan indicates a total of up to 12,100 tonnes of ammonium nitrate is intended to be transported to, stored and utilized at the three operational areas of the MLA, George Property and Goose Property. a. As any potential accidental spill of ammonium nitrate to Bathurst Inlet would constitute a release of a deleterious substance to a fish-bearing waterway contrary to SS. 36(3) of the Fisheries Act, Environment Canada requests the opportunity to review any modelling information pertaining to potential spills of ammonium nitrate to Bathurst Inlet. b. Environment Canada also requests the opportunity to review any spill response plans or strategies for addressing large quantities of ammonium nitrate potentially spilled to Bathurst Inlet as a result of an accident scenario.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
EC-41	Environment Canada notes several references to EC's Regional Environmental Emergencies Team (REET) concept (Section 7.2.2 Regional Environmental Emergencies Team, page 20 of the Oil Pollution Emergency Plan; and Section 2.1.6, Spill Response Procedures, Page 12 of the Shipping Management Plan). Please replace these references with the Environmental	Does not meet criteria for IRs – more appropriately addressed through technical review comments.

IR No.	Information Request	NIRB Rationale
	Emergencies Science Table information as provided in the attached document. This revised service delivery structure is based on the centralization of EC's Environmental Emergencies Program.	
EC-42	Environment Canada also notes that in several of the Key Government Contacts sections (namely in Table 2-4, page 13 of the Risk Management and Emergency Response Plan, and Table 5.10-4, page 13 of the Spill Contingency Plan), "Wade Romanko, Env. Emerg. Officer" should be removed, as all required spill notifications to Environment Canada are now facilitated via the NWT/NU 24hour Spill Report Line.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.