



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

July 31, 2014

Back River Distribution List

Sent via email

Re: Commencement of Technical Review Period for the NIRB's Review of Sabina Gold & Silver Corp.'s Back River project

Dear Parties:

On February 11, 2014 the Nunavut Impact Review Board (NIRB or Board) initiated the public technical review period for the Draft Environmental Impact Statement (DEIS) submitted by Sabina Gold & Silver Corp. (Sabina or Proponent) for the Back River project (NIRB File No. 12MN036). The NIRB invited interested parties to submit Information Requests to the Board for consideration by March 13, 2014¹ in order to facilitate parties' technical review of the DEIS. The NIRB received submissions on or before March 24, 2014 and, after confirming the submissions as Information Requests, on April 7, 2014 requested that the Proponent review the submissions and supply the Board with an indication of an anticipated date for submission of an IR Response Package by Tuesday April 22, 2014. The NIRB received response packages to IRs from Sabina and all other parties from whom a response was requested, on or before July 23, 2014.

The NIRB has conducted a preliminary completeness check to ensure all IRs relevant to the current stage of the review have been addressed in order to commence the 60 day technical review period. Although unable to fully assess the technical quality of the responses and to determine whether they will meet with reviewers' requirements, the NIRB is of the opinion that sufficient information has been provided to commence with next steps in the technical review of the Back River project proposal and to facilitate parties' preparation of technical review comments and the NIRB's scheduling of a Technical Meeting and Pre-Hearing Conference (PHC).

The complete DEIS, Information Requests, and IR Response Package(s) as received by the Board can be accessed online from the NIRB's public registry at the following link:

<http://ftp.nirb.ca/02-REVIEWS/ACTIVE%20REVIEWS/12MN036-SABINA-BACK%20RIVER/02-REVIEW/>.

¹ This deadline was later extended to March 24, 2014 at the request of the Kitikmeot Inuit Association.

NIRB/NWB Coordination

At the request of the Proponent, the NIRB and the Nunavut Water Board (NWB) have agreed to coordinate the NIRB Review process and the NWB's consideration of the Type A Water Licence application for the Back River Project, as described in the NIRB/NWB Detailed Coordinated Process Framework². During the technical review period, the NWB will conduct its concordance assessment to determine whether the Draft Type A Water Licence application within the Draft EIS addresses the NWB information requirements (set out in Appendix C of the EIS Guidelines for the Project). The NIRB's PHC report may contain direction from the NWB regarding any outstanding information required with submission of the Final EIS to complete the application.

Call for Technical Review Comments

The public technical review period will allow for a detailed review of the DEIS with the intent of analyzing the completeness and quality of the information presented by the Proponent in support of this project proposal. The NIRB is requesting that responsible authorities, interested parties and those with specialist advice provide their technical review comments to the NIRB prior to the conclusion of the public comment period, at **5:00 pm MT, Monday September 29, 2014**. Technical review comments should include 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.

Please be advised that the NIRB has provided a suggested format and template for parties' technical review comments, included as Appendix A.

Technical Meeting, Pre-Hearing Conference and Community Roundtable

The NIRB intends to schedule a meeting of technical experts (i.e., a Technical Meeting) in Cambridge Bay in order to facilitate discussions on technical matters related to the review of the DEIS. The Technical Meeting brings technical reviewers together in an effort to address technical issues prior to the PHC. The meeting is facilitated by NIRB staff, with participation by the Proponent, responsible authorities and other interested parties. Break-out sessions may be used, with each break out group (e.g., may be related to engineering, wildlife or socioeconomic issues) also to be facilitated by NIRB staff. During the Technical Meeting, NIRB staff will compile a list of commitments made by the Proponent when addressing planned clarifications,

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

edits or additions for the Final Environmental Impact Statement (FEIS). The list of commitments will then be carried forward to the PHC and may be incorporated into the Board's PHC decision.

Following the technical meeting, the NIRB anticipates holding a PHC in Cambridge Bay in order to discuss such matters as: timelines for submissions and the Final Hearing, future meetings, evidence, document exchange, Final Hearing venue(s), Final Hearing format and any other matters related to the logistics of the Final Hearing. The PHC provides an opportunity for parties to present to the Board on the issues that were resolved during the technical meeting, and those issues which remain outstanding. It is also an opportunity for the Board to hear from the public regarding the information contained in the DEIS. While the technical meeting is a structured but largely informal opportunity for technical experts to resolve outstanding issues, participation in the PHC is somewhat more restricted and formalized and may be moderated by the NIRB's Chairperson.

The Board will facilitate a Community Roundtable session in conjunction with the PHC, to include representation from communities identified as potentially impacted by the proposed Project in order to provide further opportunity for meaningful participation in the Board's Review. Following the PHC, the Board will issue a PHC decision which will provide direction to the Proponent for its preparation of an FEIS and which outlines the procedures for the review of the FEIS and the Final Hearing.

Having considered other scheduling obligations for the NIRB and determining the availability of meeting rooms and hotel accommodations in Cambridge Bay, the NIRB has scheduled the Technical Meeting and Pre-Hearing Conference for the following dates:

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|--------------------------------|---|
| Technical Meeting: | November 13 (afternoon & evening) – November 15, 2014 |
| Pre-Hearing Conference: | November 17-19, 2014 |

Please be advised that the NIRB has reserved a block of rooms for attendees of these events. Further details will be provided in the coming months for those individuals looking to make reservations.

Summary of Next Steps

The next steps in the NIRB's Review of the Back River project can be summarized as follows:

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|----------------------------|---|
| July 31, 2014: | Commencement of the technical review period; parties are asked to provide their technical review comments on a number of specific points, outlined above. |
| September 29, 2014: | Submission of technical review comments to the NIRB by 5:00 pm MT . |
| October 10, 2014: | Sabina to provide response to technical review comments. |
| October 24, 2014: | Circulation of <i>draft</i> agenda for the NIRB Technical Meeting. |

November 13-15, 2014: Technical Meeting in Cambridge Bay. The objective of the Technical Meeting would be to clarify and resolve technical issues in the DEIS.

November 17-19, 2014: Community Roundtable and PHC in Cambridge Bay.

December 19, 2014: NIRB to issue its PHC decision for the Back River project.

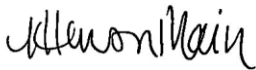
Please refer to the enclosed process map and anticipated timeline for the NIRB's Review of the Back River project for parties' information.

Deadline for submission of technical review comments

Once again, the Board requests that all interested parties submit their technical review comments directly to the NIRB at info@nirb.ca or by fax to (867) 983-2594 on or before **5:00 pm MT, Monday September 29, 2014.**

If you have any questions or require further clarification related to the NIRB's Review process, please contact Tara Arko, Technical Advisor, at (867) 983-4611 or tarko@nirb.ca.

Sincerely,



Amanda Hanson Main
Director, Technical Services
Nunavut Impact Review Board

cc: Matthew Pickard, Sabina Gold & Silver Corp.

Attached: Appendix A – Format for Parties' Technical Review Comments

Enclosure: NIRB's Review Process Map and Anticipated Timeline for the NIRB's Review of the Back River Project (*July 31, 2014*)

The NIRB has requested that responsible authorities, interested parties and those with specialist advice provide their technical review comments to the NIRB on or before **5:00 pm MT, September 29, 2014**.

For each issue raised, parties are asked to include a clear reference to the volume, document, section, and/or page number in the DEIS where relevant information may be found. Parties may find efficiencies in structuring submissions by issue, and are asked, where possible, to align their submission in accordance with the ordering of materials as presented within the NIRB's EIS Guidelines and the DEIS. A tabular presentation as provided below is requested as a means of systematically organizing comment submissions and to assist with the compilation of submissions for the next steps of the Board's Review process.

Technical review comment submissions must contain the following:

1. Executive summary

Submissions must contain a non-technical executive summary of the major issues identified during the review of the DEIS. The summary should not exceed two pages.

2. Table of contents

Submissions must contain a table of contents with sections that relate to the main headings of the NIRB's EIS Guidelines for the Back River Project and also which identify the major issues under those headings the party intends to bring forward for discussion at the Technical Meeting and/or Pre-Hearing Conference. Submissions may also address any other matter the party considers relevant to the NIRB's review of the DEIS and the Back River proposal as have been outlined above.

3. Introduction

Submissions should contain a statement of the party's mandate and relationship to the project, and for parties with regulatory jurisdiction over the Back River project, a description of the jurisdiction of that party and list of the legislation, regulations, policies and guidelines administered by the party that are applicable to the Back River project.

4. Specific comments

For each issue included in the submissions, parties should provide the following:

- a. A detailed description of the issue and, where appropriate, a reference to where within the DEIS (volume/document, section and page number) that issue is discussed;
- b. If provided by the Proponent within the DEIS, identify the Proponent's conclusion(s) related to the issue;
- c. A statement regarding the conclusion(s) of the commenting party related to the issue, including reference to the justification/data/rationale supporting that conclusion;
- d. A brief discussion assessing the issue's importance to the impact assessment process; and

- e. Any recommendation(s) to the Board with respect to the disposition of the issue.

| | |
|--|---|
| Review Comment Number | |
| Subject/Topic | |
| References to NIRB EIS Guidelines (if applicable) and DEIS (i.e. volume/document, Section/sub-section, page number, etc.) | |
| Summary (include Sabina's conclusion if relevant and conclusions of commenting party) | |
| Importance of issue to impact assessment | |
| Detailed Review Comment | 1. Gap/Issue 2. Disagreement with DEIS conclusion 3. Reasons for disagreement with DEIS conclusion |
| Recommendation/Request | |

5. Summary of recommendations

Finally, comment submissions must contain a *summary* of the recommendations to the Board with respect to:

- Whether Parties agree/disagree with the conclusions presented in the DEIS regarding the alternatives assessment, environmental impacts, proposed mitigation, significance of impacts, and monitoring measures – and all evidence supporting the parties' position;
- Whether or not conclusions presented in the DEIS are supported by the analysis – and all evidence supporting the parties' position;
- Whether appropriate methodology was utilized in the DEIS to develop conclusions – and all evidence supporting the parties' position;
- An assessment of the quality of the information presented in the DEIS; and
- Any comments regarding additional information which would be useful in assessing impacts – and reasons to support any comments made.

6. Translation/interpretation requirements

The NIRB requires executive summaries be provided in English and be translated into **Inuinnaqtun and Inuktitut**. Please note that parties are responsible for sourcing this translation.

7. Deadline for filing technical review comments

The NIRB reminds parties that the deadline for technical review comments is **5:00 p.m. MT September 29, 2014**.