



October 24, 2014

Amanda Hanson-Main  
Director, Technical Services  
Nunavut Impact Review Board  
PO Box 1360  
Cambridge Bay, NU  
X0B 0C0

**Re: Technical Comment Response Package for AANDC, EC, DFO, NRCan, GN & GNWT**

Dear Amanda,

Sabina Gold & Silver Corp. (Sabina) is pleased to provide the attached Technical Comment (TC) Response Package for comments provided by the following submitting parties.

- Government of Canada including:
  - Aboriginal Affairs and Northern Development Canada (AANDC)
  - Environment Canada (EC)
  - Fisheries and Oceans Canada (DFO)
  - Natural Resources Canada (NRCan)
- Government of Nunavut (GN)
- Government of the Northwest Territories (GNWT)

Sabina's TC Response Package consists of a primary spreadsheet, expanded responses, and an appendix. The majority of responses are provided in the spreadsheet. Where individual responses required additional space these have been included, by submitting party, in expanded response files. An appendix is also included for those TC's which required larger reports or files.

Sabina has classified all responses to TC's as 'Yes', 'Partial', or 'No':

- Yes - A Yes rating was assigned to TC's that Sabina agrees with; and/or provides the requested information in the TC Response Package or points to already available information; and/or Sabina agrees to include the requested information in the FEIS or at some point in the future.
- Partially - A Partial rating was assigned to TC's where Sabina agrees with a portion, but not all, of the TC.
- No - A No rating was assigned to TC's for which Sabina disagrees with the TC.

In total 185 responses are provided in this package. Overall, Sabina has agreed to 71% of the TC's provided, with an additional 23% partially agreed to, and 5% not agreed to. A summary of responses, by submitting party, can be found below.

Submitting Party	Total Technical Comments*	Agree	%	Partially Agree	%	Do Not Agree	%
AANDC	37	30	81%	6	16%	1	3%
DFO	15	15	100%	0	0%	0	0%
EC	50	35	70%	10	20%	5	10%
NRCan	37	32	86%	4	11%	1	3%
GN	37	18	49%	17	46%	2	5%
GNWT	9	2	22%	6	67%	1	11%
<b>Total</b>	<b>185</b>	<b>132</b>	<b>71%</b>	<b>43</b>	<b>23%</b>	<b>10</b>	<b>5%</b>

*\* Note that the total number of TC's may appear larger than the number submitted by an individual submitting party. In certain cases Sabina choose to subdivide a single TC into multiple TC's when a submitting party made multiple comments or recommendations in one TC, and where those TC's were varied in topic or focus area.*

The TC's varied in subject area and were generally in line with a submitting party's area of focus or mandate. In particular wildlife, hydrology and socio-economic concerns were identified. A summary of key subject areas can be found below.

Rank	Subject Area	Count	%*
1	Wildlife	27	15%
2	Hydrogeology	22	12%
3	Socio-Economic	19	10%
4	Water Management	14	8%
5	Management Plans & AEMP	14	8%
6	Geochemistry	11	6%
7	Marine	10	5%
8	Freshwater	10	5%

*\* All remaining subject areas were less than 5%.*



As previously committed, Sabina will respond to the TC's submitted by the Kitikmeot Inuit Association (KIA) and Government of Canada - Transport Canada (TC) by **12:00 pm MT, October 30, 2014**. At that time Sabina will also provide a draft list of commitments and a draft list of Sabina attendees for the Technical Meeting and Pre-Hearing Conference.

If any further clarifications are needed, please don't hesitate to contact me.

Yours truly,



Matthew Pickard  
Vice President, Environment and Sustainability  
Sabina Gold & Silver Corp.  
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Cc     *Tara Arko, Nunavut Impact Review Board*  
         *Max Brownhill, Sabina Gold & Silver Corp.*