

Executive Summary

Aboriginal Affairs and Northern Development Canada (AANDC) has conducted a review of Sabina Gold & Silver Corporation's (Sabina, the Proponent's) Draft Environmental Impact Statement (DEIS), which includes draft Water Licence applications, for the proposed Back River Project (the Project).

This review is a continuation of an earlier review conducted for this DEIS, which included preparation of Information Requests (IR) required for clarification and completeness of the DEIS. The current exercise, and the subject of this submission, is a complete technical review of the DEIS and the preparation of technical review comments. The issues raised in this submission will be discussed at a technical meeting and Pre-Hearing Conference to be held by the Nunavut Impact Review Board (NIRB) in November, 2014.

In reviewing the DEIS, AANDC identified several areas of concern that require further attention. In total, there are 36 specific items of outstanding concern. The details on these issues are provided in a standardized format in section 2.0 of this report. Generally, additional attention and information is sought for matters related to mine closure, site water management, permafrost and groundwater conditions, stability of mine structures, consideration for alternatives, the potential requirement for contingency measures, public engagement methods and findings, and human resources planning. It should be noted that although the Proponent has been cooperative and willing to provide information where possible, the DEIS as it stands is lacking a significant amount of information that is required to support the conclusions presented. In response to many of the previous IRs, the Proponent has stated that information will be provided in the Final Environmental Impact Statement (FEIS). Therefore, the focus of recommendations at this stage in the review, rather than being specifically related to agreement or disagreement with the conclusions presented, simply point out the need for additional and more detailed information.

It is understood that the results of a feasibility study will be used to inform updates to the FEIS which will include the final Water Licence applications. Additional detailed information and perhaps an additional IR period following submission of the FEIS, as noted in the Summary of Recommendations (Section 3.0), will significantly improve the confidence with which final decisions regarding the perceived and potential impacts of the Project can be made. The concerns raised through this submission should be addressed in the FEIS so that reviewers may undertake a final review of the proposed project.

Ataniqnut Nainaqhimayut

Nunaqaqaqtuligiyyit Ukiurtaqtumilu Pivaliayuligiyyit Kanatami (AANDC-kut) havagiyat tapkuat naunaiyaqni tapkuat Sabina Guulit Silverlu Kuapurisankut (Sabina-kut, tapkuat Uuktugutilgit) Uuktut Avatiliqutininut Aktuanit Uqauhit (DEIS-ngi), tapkuat ilalgit uuktugut Imaqmun Laisa tukhigautit, taphumunga uuktugutauyumun Hanningayuq Kuugaq Havanguyuyq (ttamna Havanguyuyq).

Una naunaiyarniq ilagiyat tapkuat hivuagut anunaiyainit havagiyat uumunga DEIS-ngi, tapkuat ilalgit hannaiyaqnit Tuhagakhat Tukhigautit (IR-ngit) piyalgit uingaiqtakhat iniqhimayakhailu tapkuat DEIS-ngi. Tapkuat tatya havagiyat, pityutauyutlu uumunga tuniyauninut, tapkuat iniqhimayangi pitquhit naunaiyaqni tapkuat DEIS-ngi tapkuatlu hannaiyaqni pitquhit naunaiyaqni uqauhit. Tapkuat pityutit hatqigauyut uumunga tunityutit uqauhiuniat talvani pitquhit katimaninut Naalaktitiniahaqtitlugitlu Katimapkainiq atqutakhat tapkuat Nunavut Avatiliqiyit Katimayit (NIRB-kut) talvani Nuvipa, 2014.

Naunaiyaqni tapkuat DEIS-ngi, AANDC-kut naunaiqtai tapkuat qaphit pityutit ihumalutaunit havaktauvalligialgit. Katitlugit, piqaqtuq 36 taihimayut hunat iniqhimaittut ihumalutit. Tapkuat unniqtuttiaqhimanit tahapkuat pityutit piqaqtitni atuqtauvaktunut ihuaqhaqnit nakataani 2.0 t. Generallyapkuat tuhagakhalit, ilavalligutit piyakhanut tuhagakhatlu qiniqtauyut pityutinut tugangayut uyagakhiuqviup umikniant, hannavikmi imamaq aulatyutai, nunap iluani qiqumainaqnia nunap qanganilu imait qanugitnit, hunnialaitni uyagakhiuqviki nappaqhimayut, ihumaginit atulat ahiit, tapkautpilaqnit piyaqaqtitninut atugahuquqtunut pityutit, inungnut piqataupkaqnit pityuhit naunaiqnitlu, inungnutlu piqaqnit havaktinik upalungaiyautit. Ilihimayauyukhaq pigaluaqtitlugit Uuktugutilgit naalainaqpaknit piqaqtitiyumainaqtitlu tuhagakhanik ayuqnaittagangat, tapkuat DEIS-ngi aulahimaittumik tatya qanugitnit piittut amigaipyaktunik tuhagakhanik piyaliknik ikayuqhiutinit iniqtigutikhainik hatqiqtitauyut. Kiugiaqhugit amihut tapkuat hivuagut Tuhagakhat Tukhigauyut, apkuat Uuktugutilgit uqaqhimayut tapkuat tuhagakhat piqaqtitauniat tapkunani Kingulliqpamik Avatiliqutininut Aktuanit Uqauhit (FEIS-ngi). Taimaittumik, tapkuat pinahuaqnit atugahuaquyauyut uumani havagininit naunaiyainit, taiguqpiangitkaluaqhugit tuganganit angigutininut angigutaungitniluniit tapkuat iniqtigutai hatqiqtitauunit, tikkuakaphuklugit piyaqaqnit ilagiagutininut unniqpaliqniluniit tuhagakhat.

IKangqihimayauyuyq tapkuat qanugitnit atuguminagiakhainut naunaiyautit atuqtauniat tuhaqhitninut nutanguqnit tapkuat FEIS-ngi tapkuat ilaqaqniat kingulliqpamik Imaqmun Laisa tukhigautit. Ilagiagutit unniqtuttiaqhimayut tuhagakhat immaqaklu ilagiagutit Tuhagakhat Tukhigauqnit pivikhat kinguagut tuniyaunit tapkuat FEIS-ngi, tuhaumanitigut tapkunani Nainaqhimayut Atugahuaqunit (Nakataani 3.0), angiyumik nakuuhivalliqniaqta ukpigiyauunit naliat kingulliqmik ihumaliugutai piplugit tapkuat ihumaginit atuqlaqnitlu aktuanit taphuma Havanguyup piyait. Tapkuat ihumalutit hatqiqtitai atuqhugit uumunga tuniyaunit hugiaqtauyukhat tapkunani FEIS-ngi nainaiyaiyunut havalagta kingulliqmik naunaiyaqnit tapkuat uuktugutauyut havanguyut.