



**NIRB File No.: 12MN036**  
**NWB File No.: 2AM-BRP1831**

November 4, 2022

To: Back River Distribution List

*Sent via email*

**Re: Request for Comments on Sabina Gold and Silver Corp.'s "Back River Project Energy Centre" Project Proposal for the Back River Project**

Dear Parties:

On August 12, 2022, the Nunavut Impact Review Board (NIRB or Board) received a referral from the Nunavut Planning Commission (the Commission) to assess Sabina Gold and Silver Corp.'s (Sabina) "Back River Project Energy Centre" project proposal noting the proposal was outside the area of an applicable land use plan. The Commission referred the proposal to the NIRB for assessment as it proposes development of a component or activity that was not part of the previously amended proposal and therefore represents a significant modification to the approved project and under Section 12.4.3 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada* (Nunavut Agreement) requires assessment by the NIRB prior to issuance of any permits, licences or other approvals by associated Regulatory Authorities. On September 20, 2022, Sabina provided the "Back River Project Energy Center" project proposal for the Board's consideration. Following a completeness check the NIRB requested additional information to determine the full scope and nature of the proposal which was provided by the Proponent on October 26, 2022.

As outlined in more detail below, the NIRB is soliciting comments from interested parties and regulatory authorities on Sabina's proposed modification to the Back River Gold Mine Project prior to determining whether the proposed changes warrant reconsideration of the existing Project Certificate No. 007 in accordance with the Nunavut Agreement Section 12.8.2 and s. 112 of the Nunavut Planning and Project Assessment Act, S.C. 2013, c. 14, s. 2 (NuPPAA). Following receipt of parties' feedback and comments, the NIRB will be providing procedural guidance in respect to next steps in the NIRB's consideration of this project proposal.

#### BACK RIVER PROJECT ENERGY CENTRE PROPOSAL OVERVIEW

As set out in the project description, Sabina has proposed a modification that would reduce consumption of non-renewable fuels for the Back River Project. Sabina noted that the proposed modification would reduce the projected fuel use at the Back River Project by approximately 50%

and thus approximately 700 fewer trips annually on the Winter Ice Road from the Marine Laydown Area due to the lessened need for fuel. This would also reduce project greenhouse gas emissions.

The project description and associated correspondence can be accessed directly via the NIRB's online public registry system at [www.nirb.ca/project/125740](http://www.nirb.ca/project/125740).

- *2022 Modification Package* (Doc ID: 341681);
- *Back River Energy Center Site Layout* (Doc ID: 341797);
- *Photo of Windfarm Area* (Doc ID: 341798); and
- *Wildlife Mitigation and Monitoring Program Plan V.11* (Doc ID: 341998).

The scope of activities described within the “Back River Project Energy Centre” includes the following undertakings, works or activities:

- Construction and use of 13 Wind Turbine Generators (WTG);
  - each WTG rated at 4 to 4.5 Megawatts;
  - each WTG to have an approximate 138-meter rotor diameter with total overall height of approximately 150 meters;
  - WTG to be spaced at intervals of 400 to 550 meters apart;
  - At mine closure, WTGs and foundations will be disposed within the approved landfill;
- Expansion of the existing Project Development Area by up to 273 hectares;
- Construction of required access roads to WTG locations;
- Construction of an approximately 400 meter by 400 meter pad adjacent to the approved Diesel Power Plant. The aggregate pad will be the location of:
  - an Electrical Station;
  - Battery Energy Storage System (BESS) consisting of lithium ion batteries contained in approximately ten (10) 40-foot seacans or an equivalent building or series of structures; and
  - a solar array of 200 meter by 400 meter;
- Installation of approximately 5 to 7 kilometers of electrical transmission lines from WTGs to the Electrical Station;
  - Cables to be laid directly on tundra and/or laid next to access roads and covered with aggregate; and
  - Dependent on site conditions, some or all of the electrical transmission lines may be located overhead on poles.

Sabina has conducted a self-assessment on each of the proposed modification and provided the conclusion that, in its view, the changes proposed do not constitute significant modifications to the approved project and will not result in significant changes to the overall environmental or socio-economic effects previously predicted for the Back River Project, and will result in positive impact through reductions to fuel consumption, air emissions and contributions to climate change, potential interactions with wildlife, and the likelihood of accidents and spills.

#### COMMENT REQUEST

In recognition of the important role of public and technical submissions that supported the development of the terms and conditions in the existing Project Certificate, the NIRB is requesting comments from parties prior to determining whether the proposed changes warrant reconsideration

of the existing Project Certificate No. 007 in accordance with Section 12.8.2 of the *Nunavut Agreement* and s. 112(1) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*). By copy of this letter, the NIRB invites interested parties, members of the public, and those regulatory authorities with jurisdiction over components of the Back River Project to provide comments and advice to the Board with respect to the following:

- a) Whether the proposed modification constitutes a significant modification to the original project as previously assessed and subsequently modified and approved by the NIRB;
- b) Whether the proposed modification is consistent with the terms and conditions of the existing Project Certificate No. 007, or are changes to the Project Certificate necessary to reflect the modification; and
- c) Any matter of importance to the commenting party related to the Board's processing of the project proposal.

The NIRB requests that parties submit comments directly to the NIRB via email at [info@nirb.ca](mailto:info@nirb.ca) or through the online public registry at [www.nirb.ca](http://www.nirb.ca) by **November 25, 2022**.

If additional time is required to develop submissions, please submit a request in writing to the NIRB office as soon as possible. The request must specify the additional time being sought and reasons why, so that the Board is able to consider each request based on the justification provided and if found acceptable, also provide all parties with equal opportunity to work on their submissions.

Should you have any questions or require additional clarification regarding the NIRB's approach to assessing either of the above noted project proposals, please contact the undersigned directly at [kmorrison@nirb.ca](mailto:kmorrison@nirb.ca). If you have questions related to the proposal or accessing the information, please contact Guillaume Daoust, Technical Advisor II, at [gdaoust@nirb.ca](mailto:gdaoust@nirb.ca).

Sincerely,



Keith Morrison  
Manager, Impact Assessment  
Nunavut Impact Review Board

cc: Matthew Pickard, Sabina Gold and Silver Corp.  
Merle Keefe, Sabina Gold and Silver Corp.  
Sharon Ehloak, Nunavut Planning Commission  
Goump Djalogue, Nunavut Planning Commission  
Stephanie Autut, Nunavut Water Board  
Karén Kharatyan, Nunavut Water Board  
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