



## EXECUTIVE SUMMARY

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) is an interested party in the review of water licence applications processed by the Nunavut Water Board (NWB). The Department co-manages Nunavut's freshwater resources with the NWB based on its mandated responsibilities largely under the *Nunavut Agreement*, the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and its regulations, and the *Department of Indian Affairs and Northern Development Act*.

CIRNAC's Water Resources Division has focused its Technical Review of the Licensee's (Sabina's) water licence application and supporting documents on the protection of freshwater quality, the quantity of water used and the wastes deposited resulting from the proposed Back River Project. This includes the review of site management and monitoring plans as well as infrastructure design. All phases of the Project were reviewed (i.e., construction, operation, closure, and post-closure).

Based on the review of documentation provided by Sabina, and of Sabina's responses to CIRNAC, the Water Resources Division has identified two (2) remaining Technical Review Comments for consideration by the NWB and Sabina at the upcoming Public Hearing in Cambridge Bay, Nunavut. Summaries of each of these Technical Review Comments are provided as follows:

### 1. Tailings Storage Facility Management

**Grading and Drainage of the Tailings Storage Facility (TSF)** – Sabina's revised Figures A-02 and A-09 were prepared to show future grading and drainage of the TSF Containment Area. However the drawings inadequately show a flow path for water from the eastern portion of the TSF/Waste Rock Storage Area (WRSa) catchment area to reach the facility contact water pond on the west side of the facility.

### 2. Saline Water Management

**Adequacy of Primary and Saline Ponds** - Sabina provided additional information to show that the Primary Pond has sufficient capacity to contain direct inflow plus managed (pumped inflows) associated with a single-day runoff event. However, on further review, we have concerns regarding (1) the adequacy of a 1-day storm event to size ponds that rely on storage volume (rather than pumped release) to meet design objectives; and (2) the risk of a cascading failure.

## Security

Security for the Project has been agreed upon by the following parties: Sabina, Kitikmeot Inuit and CIRNAC. The total agreed upon amount for the Back River project is \$43,189,307. Security for the project will be furnished in stages as each Project component is started or undertaken. This allows for the Project to proceed without the Project becoming a liability to the crown and/or land owner.