

October 16, 2020

Richard Dwyer  
Manager of Licencing  
Nunavut Water Board  
PO Box 119  
Gjoa Haven, NU X0B 1J0

**Re: Sabina Response to Technical Comments on 2AM-BRP1831 2019 Annual Report**

Dear Richard,

Thank you for the technical review of Sabina Gold & Silver Corp. (Sabina) 2019 Annual Report (Report) dated August 24, 2020. This letter addresses the outstanding recommendations outlined in the Nunavut Water Boards (NWBs) technical review.

**NWB Recommendation 1 (from ECCC): Incinerator Stack Testing (response deadline October 31, 2020)**

- *Provide details on actions the Licensee will take should initial incinerator stack testing results exceed Canada-Wide standards, including implementation of a follow-up test;*
- *Provide details on what management actions the Licensee will take to monitor emissions after the initial stack test;*
- *ECCC recommends that the Licensee conduct additional stack testing at a 3-year interval and recommend that the proponent revise relevant management plans accordingly.*

**Sabina Response:** As noted by the NWB, although ECCC had no comments in relation Sabina's 2019 Annual Report for Water Licence 2AM-BRP1831, ECCC attached a letter sent to Nunavut Impact Review Board (NIRB) on May 20, 2020, with comments on Sabina's 2019 Annual Report for Project Certificate No. 007. The above recommendations came from ECCC's letter to the NIRB, and were addressed by Sabina in a letter to the NIRB dated June 29, 2020. Relevant excerpts from Sabina's June 29, 2020 response to ECCC's comments are provided below and a copy of the revised Incineration Management Plan (IMP) is attached.

*"Following the initial stack testing in the first year of operations, Sabina will conduct routine follow-up stack testing every 3 years when incineration quantities meet the testing threshold. Should emissions exceed Canada Wide Standards for Dioxins and Furans or Mercury Sabina would consult the incinerator manufacturer for recommendations on improvement and/or conduct a waste stream audit to determine the possible source of elevated emissions and further refine the incinerator waste stream. Manufacturer recommendations and waste stream refinement would be implemented to the extent feasible and the success of these measures would be verified in the subsequent round of stack testing. This information has been added to the updated IMP included in this response package."*

**NWB Recommendation 2 (from NWB):** Management Plan Updates (response due March 31, 2021)

*Provide a table listing all Management Plans modified in the reporting year and include the following information:*

- *title of the plan;*
- *most recent NWB Approval date (for approved plans);*
- *most current update date;*
- *brief description of the update including sections modified;*
- *classification of the update (significant vs. insignificant as per Licensee).*

*(Note that upon review of the plan, the Board will make their own determination of significance independent of the Licensee's suggestion).*

**Sabina Response:** Sabina will provide the requested information by March 31, 2021.

Sabina appreciates the opportunity to respond to these recommendations. Should you require any additional information please feel free to contact me.

Regards,



Merle Keefe  
Manager, Environmental Permitting  
Sabina Gold & Silver Corp.  
#1800 – 555 Burrard Street  
Vancouver, BC V7X 1M9

*Enclosed: Sabina's Back River Project Incineration Management Plan*