

Environmental Protection Operations Directorate  
Prairie & Northern Region  
5019 52<sup>nd</sup> Street, 4<sup>th</sup> Floor  
P.O. Box 2310  
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 115/002  
NWB File: 2AM-BRP1831



September 10, 2020

via email at: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

Stephanie Autut  
Executive Director  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

Dear Stephanie Autut:

**RE: Licence #2AM-BRP1831 – Sabina Gold & Silver Corp. – Back River Project – Rascal Diversion Berm Detailed Report Reviewed**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned detailed report.

ECCC's specialist advice based on our mandate pursuant to the *Canadian Environmental Protection Act* and the pollution prevention provisions of the *Fisheries Act*.

The following comments are provided:

**1. Topic – Geochemistry**

Reference(s)

- Section C: Geochemical Analysis of Waste Rock and Fill, Demonstrating their Acid Rock Drainage and Metal Leaching Characteristics
  - C.1 – Quarry Rock at the Goose Property

Comment

The proponent stated, "Consistent with the waste rock classification criteria in the WRMP, the criteria that will be used to classify NPAG material to be used for construction from any quarry source will be an neutralization potential/acid generation potential (NP/AP) ratio of greater than 3, or a sulphur content of less than 0.15% (Table C-1).

ECCC supports the proponent's proposed use of neutralization potential/acid generation potential (NP/AP) ratio of greater than 3 as classification criteria rather than using sulphur



content because low sulfur content rock may still be potentially acid generating if there is no neutralization potential available.

ECCC Recommendation(s)

ECCC recommends the use of neutralization potential/acid generation potential (NP/AP) ratio of greater than 3 as classification criteria, as proposed.

If you need more information, please contact Orlagh O'Sullivan at (431) 276-4506 or [Orlagh.OSullivan@Canada.ca](mailto:Orlagh.OSullivan@Canada.ca).

Sincerely,

*[original signed by]*

Orlagh O'Sullivan  
Environmental Assessment Officer

cc: John Olyslager, Acting Head, Environmental Assessment North (NT and NU)