



NIRB File No.: 12MN036

December 8, 2015

Matthew Pickard
Vice President, Environment and Sustainability
Sabina Gold & Silver Corporation
Suite 375, Two Bentall Centre
555 Burrard Street
P.O. Box 220
Vancouver, BC V7X 1M7

Sent via email: mpickard@sabinagoldsilver.com

Re: Acceptance of the Final Environmental Impact Statement and Commencement of the NIRB's Technical Review of Sabina Gold & Silver Corporation's Back River Project Proposal

Dear Matthew Pickard:

On November 23, 2015 the Nunavut Impact Review Board (NIRB or Board) received Sabina Gold & Silver Corporation's (Sabina or Proponent) Final Environmental Impact Statement (FEIS) submission in support of the Board's Review of the "Back River" project proposal (the Project). Immediately following receipt of the submission, the NIRB initiated an internal 15 day cursory review of the FEIS and associated documentation to determine compliance with the requirements of the NIRB's previously issued EIS Guidelines¹, and Pre-hearing Conference Decision² (PHC Decision), including commitments made by Sabina prior to, and during, the Technical Meeting.

COMPLIANCE CHECK

The NIRB has now completed its compliance check of the FEIS submitted by Sabina and has determined that the submission generally complies with both the Board's EIS Guidelines and the Board's PHC Decision; the NIRB is, therefore, accepting the FEIS and initiating a public review of the associated documentation.

Sabina's FEIS submission and all materials received and pertaining to the Back River Project proposal can be accessed from the NIRB's online public registry at the following location:

¹ NIRB Guidelines for the Preparation of an Environmental Impact Statement for Sabina Gold & Silver Corp.'s Back River Project (NIRB File No. 12MN036), issued April 30, 2013.

² Nunavut Impact Review Board Pre-hearing Conference Decision Concerning the Back River Project (NIRB File No. 12MN036) Proposed by Sabina Gold & Silver Corporation, issued December 19, 2014.

<http://ftp.nirb.ca/02-REVIEWS/ACTIVE%20REVIEWS/12MN036-SABINA-BACK%20RIVER/02-REVIEW/>.

Sabina is also reminded that it is responsible to supply parties with the hardcopies of the FEIS to facilitate their review, as outlined in Appendix A of this letter.

PROJECT PROPOSAL OVERVIEW

On July 3, 2015 the NIRB received notification from the Proponent that the scope of the Back River project proposal was being reduced to remove activities associated with development of the mineral deposit located at George Lake. Subsequently, the scope of the NIRB's assessment has been reduced to remove these components. Within the FEIS, Sabina is proposing the following activities and components as the Back River project proposal:

- Mine development to involve Goose property and Marine Laydown Area, ongoing exploration at George site;
- Project activities conducted on the following schedule: mobilization and construction 4 years, operations 10 years, reclamation and closure 8 years, and post-closure monitoring 5 years;
- Goose property:
 - Open pit and underground mining methods used to access four deposits: Umwelt, Llama, Goose Main, and Echo,
 - Produce total of 19.8 million tonnes of ore over the life of mine,
 - Mill to process 6,000 tonnes of ore per day resulting in approximately 3,628 koz of gold in total,
 - Tailings storage facility located on Crown land,
 - Year round access to site by aircraft,
 - Bulk fuel storage, airstrip, explosives storage, support buildings and warehouses, water and waste management facilities, and worker accommodations;
- Marine Laydown Area:
 - Connected to Goose property by winter ice roads,
 - Marine supply via open water seasonal shipping (approx. 3-5 vessels per year),
 - In water construction of a single grounded terminal barge.
 - Bulk fuel storage, airstrip, explosives storage, support buildings and warehouses, water and waste management facilities, and worker accommodations;
- Ongoing exploration at George site connected to development via winter road;
- Direct operations employment up to 6,970 person-years over a 10 year period; and
- Gold doré bars shipped from site by aircraft.

OBJECTIVE OF THE NIRB'S TECHNICAL REVIEW

The Technical Review Process

With the acceptance of the Proponent's November 23, 2015 submission, the Board now commences the technical review period of Sabina's FEIS for the Back River project. As set out in the NIRB's Pre-hearing Conference Decision for the Back River project, during the first 30 days of the 90-day technical review period parties may identify and submit Information Requests regarding gaps in the document which might limit their respective technical assessment of key

project components or activities; Information Requests (IRs) may be submitted no later than January 15, 2016 (minimum 30 days). The Proponent will be asked to provide responses to information requests by no later than February 8, 2016 (day 60 of the technical review period). All Parties are asked to provide final written submissions to the Board by the close of the technical review period on March 7, 2016 (day 90 of the technical review period), in advance of the Final Hearing for the Board's consideration of the Back River Project proposal pursuant to Section 12.5.3 of the Nunavut Land Claims Agreement (NLCA).

The NIRB will provide additional guidance to parties regarding the suggested format and structure of submissions of technical comments following receipt of IRs.

Format for Information Requests

Parties are advised that IRs are not meant to serve as technical review comments, but rather should identify information gaps within the FEIS that need to be addressed so that parties can develop their respective technical review comments. Identification of necessary IRs during the FEIS stage is generally expected to be considerably less than for the technical review of the Draft Environmental Statement. Parties are encouraged to review **Appendix B** of this letter which provides the NIRB's suggested format for the submission of IRs. Additional clarification regarding the information that must be included within submissions is as follows:

- A clear reference to the volume, document, section, and/or page number in the FEIS where relevant information may be found, if applicable;
- To whom the IR is directed;
- Identification of the issue and specific information being requested;
- The concern associated with the issue; and
- A clear rationale of the issue and information's importance to the impact assessment of the proposed project.

By copy of this letter, the NIRB is requesting that responsible authorities, interested parties and those with specialist advice provide their information requests to the NIRB on or before **5:00 p.m. MST, January 15, 2016.**³

NEXT STEPS

The next steps in the NIRB's Review of the Back River project as illustrated in the enclosed process map are as follows:

- Parties submit Information Requests (IRs) to the NIRB by **5:00 p.m. MST January 15, 2016.**
- After considering the suitability of IRs submitted, the NIRB will forward all appropriate requests to the Proponent or other parties if applicable by **January 22, 2016.**
- Proponent, and other parties if applicable, to provide Response to Information Requests to the NIRB by **February 8, 2016.**

³ Adjusted to compensate for the holiday closure, in line with a request from the Kitikmeot Inuit Association received by the NIRB on December 2, 2015.

- Parties complete remaining 60 day technical review period and provide final written submissions to the NIRB by **March 7, 2016**.

Once again, the NIRB requests that all interested parties submit their Information Requests to the NIRB by email at info@nirb.ca or by fax to (867) 983-2594 on or before **5:00 p.m. MST, January 15, 2016**.

Should you have any questions or require further clarification regarding the next steps in the Board's assessment of the Back River Project proposal, please contact the undersigned at (867) 983-4607 or kbenoit@nirb.ca.

Sincerely,



Kristina Benoit
Technical Advisor
Nunavut Impact Review Board

cc: Back River Distribution List
Regan Petelski, Sabina Gold & Silver Corp.
Phyllis Beaulieu, Nunavut Water Board
Geoff Clark, Kitikmeot Inuit Association
Luigi Torretti, Kitikmeot Inuit Association

Attachments (2): Appendix A: Parties' Requests for Copies of the Back River FEIS
Appendix B: Suggested Format for Information Requests

Enclosure (1): NIRB Review Timeline for the Back River Project, December 8, 2015

APPENDIX A: PARTIES' REQUESTS FOR COPIES OF THE BACK RIVER FEIS

Contact Name & Address	Number and Type of FEIS Copy Requested
Nunavut Impact Review Board	
Nunavut Impact Review Board 29 Mitik Street P.O. Box 1360 Cambridge Bay, NU X0B 0C0	9 Print Copies of the Main Document- including digital copies of complete FEIS 1 Complete Print Copy
Nunavut Tunngavik Incorporated	
Carson Gillis Director, Department of Lands and Resources Nunavut Tunngavik Incorporated P.O. Box 1269 Cambridge Bay, NU X0B 0C0	1 Digital Copy
Kitikmeot Inuit Association	
Tannis Bolt Project Officer Kitikmeot Inuit Association P.O. Box 360 Kugluktuk, NU X0B 0E0	1 Digital Copy & 1 Complete Print Copy
Neil Hutchinson Hutchinson Environmental Sciences Ltd. <i>Attn: Neil Hutchinson</i> 1-5 Chancery Lane Bracebridge, ON P1L 2E3	1 Digital Copy
Lukas Arenson BGC Engineering Inc. <i>Attn: Lukas Arenson</i> Suite 500 – 980 Howe Street Vancouver, BC V6Z 0C8	1 Digital Copy
Heather Bears Zoetica Wildlife Consulting Services <i>Attn: Heather Bears</i> 23007 - 134 Loop Maple Ridge, BC V4R 0E6	1 Digital Copy & 1 Print Copy of the Wildlife Sections including supporting documents
Rick Palmer Palmer Environmental Consulting Group Inc. <i>Attn: Rick Palmer</i> 470 Granville Street – Suite 630 Vancouver, BC V6C 1V5	1 Digital Copy
Government of Nunavut	
Lisa-Marie Leclerc Department of Environment Government of Nunavut P.O. Box 377 Kugluktuk, NU X0B0E0	1 Digital Copy & 1 Complete Print Copy

Contact Name & Address	Number and Type of FEIS Copy Requested
Melanie Wilson Department of Environment Government of Nunavut P.O. Box 209 Igloolik, NU X0A 0L0	1 Digital Copy & 1 Complete Print Copy
David Beamer Department of Environment Government of Nunavut P.O. Box 83 Rankin Inlet, NU X0C 0G0	1 Digital Copy & 1 Complete Print Copy
James Rogers Department of Environment Government of Nunavut P.O. Box 1000 Iqaluit, NU X0A 0H0	5 Digital Copies
Lou Kamermans Department of Economic Development and Transportation Government of Nunavut P.O. Box 1000 Station 1500 Iqaluit, NU X0A 0H0	10 Digital Copies & 1 Complete Print Copy
Indigenous and Northern Affairs Canada	
Felexce Ngwa Indigenous and Northern Affairs Canada Nunavut Regional Office Building 918 P.O. Box 100 Iqaluit, NU X0A 0H0	3 Digital Copies
Environment Canada	
Mark Dahl Environment Canada 150-123 Main Street Winnipeg, MB R3C 4W2	1 Digital Copy
Anne Wilson Environment Canada Eastgate Offices 9250-49 St NW Edmonton, AB T6B 1K5	1 Digital Copy
Jean-Francois Dufour Environment Canada 5019 - 52 nd Street 4 th Floor P.O. Box 2310 Yellowknife, NT X1A 2P7	1 Digital Copy

Contact Name & Address	Number and Type of FEIS Copy Requested
Raymond Kotchorek Environment Canada 351 St-Joseph Blvd. 16th floor Gatineau, QC K1A 0H3	1 Digital Copy
Tanmay Praharaj Place Vincent Massey 18th Floor 351 St. Joseph Blvd. Gatineau, QC K1A 0H3	1 Digital Copy
Loretta Ransom Environment Canada 5019 - 52 nd Street 4 th Floor P.O. Box 2310 Yellowknife, NT X1A 2P7	2 Digital Copies & 1 Complete Print Copy
Reg Ejeckam Environment Canada 150-123 Main Street Winnipeg, MB R3C 4W2	1 Digital Copy
Fisheries and Oceans Canada	
Georgina Williston 301-5204 50 th Avenue Yellowknife, NT X1A 1E2	2 Digital Copies
Natural Resources Canada	
Angelique Magee Natural Resources Canada 11-B7-2, 580 Booth Street Ottawa, ON K1A 0E4	1 Digital Copy
Charlene Hogan Natural Resources Canada Room 328C, 555 Booth Street Ottawa, ON K1A 0G1	1 Complete Print Copy
Shawna Liao Natural Resources Canada 2 nd floor, Room 329, 601 Booth Street Ottawa, ON K1A 0E8	1 Complete Print Copy
Transport Canada	
Adam Downing Environmental Officer Transport Canada Environmental Affairs Prairie and Northern Region P.O. Box 8550 3-344 Edmonton Street Winnipeg, MB R3C 0P6	1 Digital Copy

Contact Name & Address	Number and Type of FEIS Copy Requested
Government of the Northwest Territories	
Melissa Pink Project Assessment Analyst Land Use and Sustainability Department of Lands, Government of the Northwest Territories P.O. Box 1320 Yellowknife NT X1A 2L9	2 Digital Copies
Tłıchǫ Government - Department of Culture and Lands Protection	
Sjoerd van der Wielen Manager, Lands Section Tłıchǫ Government, DCLP P.O. Box 412 Behchokǫ, NT X0E 0Y0	1 Digital Copy & 1 Complete Print Copy
Lutsel K'e Dene First Nation	
Mike Tollis Wildlife, Lands, and Environment Manager Lutsel K'e Dene First Nation P.O. Box 28 Lutsel K'e, NT X0E 1A0	1 Digital Copy
Yellowknives Dene First Nation	
Alex Power Regulatory and Research Specialist Yellowknives Dene First Nation P.O. Box 2514 Yellowknife, NT X1A 2P8	1 Digital Copy
North Slave Métis Alliance	
Shin Shiga Regulatory Analyst North Slave Métis Alliance 32 Melville Drive P.O. Box 2301 Yellowknife, NT X1A 2P7	1 Digital Copy
Public Participant	
Anne Gunn 368 Roland Road Salt Spring Island, BC V8K 1V1	1 Digital Copy

APPENDIX B: SUGGESTED FORMAT FOR INFORMATION REQUESTS

Format & File Size

Parties are requested to provide information requests in a fully functional, electronically searchable Word or PDF file. Noting the current constraints with respect to internet bandwidth and speed, the NIRB requires that all submissions or individual files be no larger than 5 MB.

Information Requests

The purpose of information requests is to identify information gaps or areas of uncertainty within the FEIS that need to be addressed so that parties can develop their respective technical review comments. Information requests can originate from, and be directed at, any of the parties involved in the assessment. Submissions must outline why the information required is necessary to facilitate the party's technical analysis of the FEIS and the potential impacts of the proposal. After considering all information requests submitted and making decisions regarding their suitability, the NIRB will forward all appropriate requests to the Proponent and/or other parties as applicable. The NIRB will assess suitability of the information request based on the information being sought as well as the requirements of the Guidelines and PHC Decisions, and if it is determined that the item is a technical review comment, it will be deferred for consideration with parties' technical review comments.

Parties are asked to ensure that information requests (IR) address the points set out below:

IR Source:	The overall submission should clearly identify the organization/department/intervener proposing the request(s).
IR Number:	Each specific IR must be numbered in order to enable effective cross-referencing of the submission.
To:	Clearly identify to which organizations/departments/agencies the IR is directed (e.g., the Proponent and/or specific organization(s) of whom the information is requested).
Subject:	Identify the issue; list the general subject or topic associated with the request (e.g., monitoring of sediment quality).
Reference:	A clear reference to any applicable volume, document, section, and/or page number in the FEIS where information relevant to the request may be found.
Issue/Concern:	Provide background information and justification for the request. The issue/concern should identify any shortcomings of available information, concerns associated with the issue and how the requested information is relevant to the technical analysis of information within the FEIS. A clear rationale of the issue's importance to the impact assessment of the proposed project is required.
Information Request:	Specifically state the question and/or outline the specific information being requested to the organization. Separate items requested should be appropriately numbered in order to track the provision of responses.