



NIRB File No.: 09RN066
AANDC File No.: N2010F0017

October 1, 2014

The Honourable Bernard Valcourt
Minister of Aboriginal Affairs and Northern Development
c/o Tracey McCaie, Manager, Land Administration
Aboriginal Affairs and Northern Development Canada
P.O. Box 100
Iqaluit, NU X0A 0H0

Sent via email: tracey.mccaie@aandc.gc.ca; landsmining@aandc.gc.ca

Re: **Application Exempt from the Requirement for Screening pursuant to Section 12.4.3 of the NLCA: Sabina Gold & Silver Corp.'s "Winter Roads – Hackett, George and Goose Camps" project, Kitikmeot Region**

Dear Tracey McCaie:

On September 8, 2014 the Nunavut Impact Review Board (NIRB or Board) received an application from Aboriginal Affairs and Northern Development Canada (AANDC) for an extension to the AANDC Land Use Permit (No. N2010F0017) associated with Sabina Gold & Silver Corp.'s (Sabina) "Winter Roads – Hackett, George and Goose Camps" project proposal. The Board notes that a conformity determination from the Nunavut Planning Commission was not required for this file, as the proposed project is located within a region that does not currently have an approved land use plan in place (Kitikmeot Region).

Please be advised that the original project proposal (NIRB File No. 09RN066) was received by the NIRB from Indian and Northern Affairs Canada (INAC; now AANDC) on October 19, 2009 and was screened by the Board in accordance with Part 4, Article 12 of the Nunavut Land Claims Agreement (NLCA). On November 30, 2009 the NIRB issued the enclosed NLCA 12.4.4(a) screening decision to the Minister of INAC which indicated that the proposed project could proceed subject to the NIRB's recommended project-specific terms and conditions.

Additional authorization and extension requests for the various permits and licenses associated with this project have also been assessed by the NIRB following the initial screening of the project proposal (NIRB File No.: 09RN066) and are presented in Table 1.

Table 1: Additional Applications Associated with NIRB File No.: 09RN066

Authorization	Application			NIRB Decision	
	Date Received by NIRB	Type	Reason for Application	Date Issued	Type
AANDC LUP N2009F0015	January 11, 2010	Amendment	New D'Arcy Lake airstrip and winter corridor connecting to pre-existing road between Hackett and George camps	February 11, 2010	Reissued November 30, 2009 SDR with <i>additional</i> terms and conditions
AANDC LUP N2010F0017	July 6, 2010	New LUP application	Construct winter road between Bathurst Inlet and Back River Project and barge resupply to Bathurst Inlet	September 2, 2010	Reissued February 11, 2010 SDR with <i>additional</i> terms and conditions
AANDC LUP N2004F0006 N2009F0015	January 17, 2011	Extension	Continue exploration and camp re-supply	January 19, 2011	Reissued September 2, 2010 SDR
AANDC LUP N2011F0029	November 25, 2011	Replace N2004F0006	Replace previous AANDC LUP	December 1, 2011	Reissued September 2, 2010 SDR
AANDC LUP N2009F0015	March 8, 2012	Extension	Conduct ongoing exploration activities	March 12, 2012	Reissued September 2, 2010 SDR
AANDC LUP N2010F0017	March 8, 2012	Extension	Continue resupply service between projects	March 16, 2012	Reissued September 2, 2010 SDR
AANDC LUP N2009F0015	February 8, 2013	Extension	Conduct ongoing exploration activities	March 7, 2013	Reissued September 2, 2010 SDR
AANDC LUP N2010F0017	August 1, 2013	Extension	Continue movement of equipment and supplies (from possible barge resupply) between Bathurst Inlet and existing exploration camps in Back River area	August 30, 2013	Reissued September 2, 2010 SDR
AANDC LUP N2011F0029, in addition to KIA LUP and AANDC LUP N2013F0022	October 24, 2013	Extension	Continue movement of supplies between existing exploration camps in the Back River area	November 22, 2013	Reissued September 2, 2010 SDR
AANDC LUP N2014C0002; N2014C0004	February 3, 2014	Renew and replace LUP N2009C0019	Replace Bullion Camp LUP (N2009C0019 with N2014C0002), and Hayes Camp (N2009C0018 with N2014C0004) to continue previously approved exploration activities.	April 22, 2014	Reissued September 2, 2010 SDR

Notes: AANDC = Aboriginal Affairs and Northern Development Canada; LUP = Land Use Permit; KIA = Kitikmeot Inuit Association; NIRB = Nunavut Impact Review Board; SDR = Screening Decision Report

The current AANDC application, the original NIRB Screening Decision Report (File No. 09RN066) and related file information are available from the NIRB's online public registry at the following location:

<http://ftp.nirb.ca/01-SCREENINGS/COMPLETED%20SCREENINGS/2010/09RN066-Sabina%20Silver%20Corp-Winter%20Roads/>.

PREVIOUSLY-SCREENED PROJECT PROPOSAL:

As previously screened by the NIRB (File No. 09RN066), the "Winter Roads – Hackett, George and Goose Camps" project was located within the Kitikmeot region, approximately 150 kilometres (km) south of Bathurst Inlet. The Proponent indicated that it intended to construct winter trails which connected its barge offloading area at Bathurst Inlet to the Goose Lake, George Lake and the Hackett River camps in order to facilitate the movement of supplies and fuel needed for year-round exploration activities in that area.

The activities and components associated with the proposed project as originally received by the NIRB on October 19, 2009 and which were screened under the consolidated NIRB file number 09RN066 included:

- Construction of winter road route between the George Lake and Goose Lake camps (per NIRB File No.: 04RN015);
- Construction of winter road route between the George Lake and Hackett River camps (approximately 60 km in length);
- Finalized route selection to be based upon environmental conditions, determined via helicopter and/or snow machine reconnaissance trips;
- Temporary survival tents (1-2) to be established along the winter road routes, for the duration of permitted activities only;
- Redistribution of equipment and materials (including chemicals) via Cat-haul transportation between the George Lake, Goose Lake, and Hackett River camps;
- Fuel and supplies delivered daily to personnel along the routes, with removal of waste material to camp as required;
- Clean-up of the routes in preparation for closure; and,
- Abandonment and restoration of road routes upon completion of transportation activities.

The activities and components associated with the January 11, 2010 LUP (No. N2009F0015) amendment application included:

- Construction and operation of an ice airstrip at D'Arcy Lake including:
 - Use of Hercules aircraft at airstrip,
 - Airstrip operation for up to sixty days between February 20 and May 31, 2010,
- Construction and use of a winter road route (approximately 2 km in length) between the D'Arcy Lake and the previously permitted winter road between Hackett River and George Lake camps, and,
- Conduct the proposed activities between February and May 2010.

The activities and components associated with the July 6, 2010 new LUP (No. N2010F0017) application included:

- Establishment of a temporary camp at Bathurst Inlet;
- Establishment of an ice airstrip at Bathurst Inlet; and,
- Storage of fuel at Bathurst Inlet including:
 - Drummed fuel (approximately 881,500 litres various fuel types, 7500 pounds of propane and 100 pounds of acetylene) to be stored within secondary containment at the Bathurst Inlet lay down area,
 - Bulk fuel (approximately 600,000 litres diesel) to be stored on barge prior to being transferred to tanks or sleighs for transport to Hackett River/Goose Lake camps via Cat-train (involves overwinter storage via barge freeze-in during the winter of 2011-2012).

The January 17, 2011 LUP applications (No. N2004F0006 and N2009F0015) involved proposed one year extensions to each permit to continue project activities in the Hackett River and Back River areas, respectively.

Sabina's November 25, 2011 application was intended to replace the previously issued and expiring AANDC LUP (No. N2004F0006) with a new LUP (No. N2011F0029) in order to continue its activities in the area.

The March 8, 2012 and February 8, 2013 applications involved extensions to the AANDC LUP (No. N2009F0015) each for one additional year to continue with previously permitted activities.

Sabina's separate March 8, 2012 application as well as the August 1, 2013 application involved an extension to its LUP (No. N2010F0017) for the project for one additional year to continue the movement of equipment and supplies, from possible barge resupply, between Bathurst Inlet and the pre-existing exploration camps in the Back River area.

The October 24, 2013 application involved an extension to Sabina's LUP (No N2011F0029) for one additional year to continue the movement of supplies between its existing exploration camps in the Back River area.

The November 5, 2013 application components for Sabina's LUP (No. N2013F0022) remained the same as those previously screened under NIRB File No.: 09RN066; the winter roads that had been considered within NIRB File No.: 09RN066 were utilized by both Glencore for its Hackett, George and Goose camp areas, as well as by Sabina Gold & Silver Corp. in support of exploration at its Back River Project area.

CURRENT APPLICATION:

Sabina is currently proposing to extend its AANDC Land Use Permit (No. N2010F0017) for a period of one year to continue facilitating the movement of supplies through the corridor between the Back River project to Bathurst Inlet and the barge laydown area previously assessed for the 2013-2014 exploration season.

Please note that Section 12.4.3 of the NLCA states that:

“Any application for a component or activity of a project proposal that has been permitted to proceed in accordance with these provisions shall be exempt from the requirement for screening by NIRB unless:

(a) such component or activity was not part of the original project proposal; or

(b) its inclusion would significantly modify the project.”

After completing a review of the information provided in support of the current application, the NIRB is of the understanding that the proposed extension does not change the general scope of the original project activities, and the exceptions noted in NLCA 12.4.3(a) and (b) do not apply. Therefore, this application is exempt from the requirement for screening pursuant to Section 12.4.3 of the NLCA and the activities therein remain subject to the terms and conditions recommended in the September 2, 2010 Screening Decision Report (enclosed).

If you have any questions or require additional clarification, please contact Tara Arko, Technical Advisor, at (867) 983-4611 or tarko@nirb.ca.

Sincerely,



Ryan Barry
Executive Director
Nunavut Impact Review Board

cc: John Laitin, Sabina Gold & Silver Corp.
Phyllis Beaulieu, Nunavut Water Board
Geoffrey Clark, Kitikmeot Inuit Association

Enclosure: NIRB Screening Decision Report, File No.: 09RN066 (September 2, 2010)