

NUNAVUT PLANNING COMMISSION
PUBLIC HEARING ON THE 2016 DRAFT NUNAVUT LAND USE PLAN

SABINA GOLD AND SILVER CORP.

PRE-HEARING WRITTEN SUBMISSIONS

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M. Pickard – Sabina Gold & Silver Corp.
Submission for the Public Hearing on the 2016 Draft Nunavut Land Use Plan

1/13/2017

1 Background and Objectives

Sabina Gold & Silver Corp. (Sabina) has been active in the Kitikmeot region of Nunavut for the past 8 years focused on the advancement of the Back River Project. Sabina has been actively monitoring and engaged in the advancement of the Draft Nunavut Land Use Plan for the past 5 years.

2 General Comments and Recommendations

Sabina supports the development of a Nunavut Land Use Plan.

Sabina has significant concerns that the proposed 2016 version has created too many Protected Areas as compared to previous versions. The NPC has substantially changed the designations for the protection of caribou habitat, caribou freshwater crossings and Heritage Rivers in the revised 2016 Draft Nunavut Land Use Plan from Special Management Areas to Protected Areas. It is our view that many of these zones lack the scientific and traditional knowledge evidence to make them Protected Areas and should be designated as Special Management Areas instead.

Sabina agrees with the Government of Nunavut's position that, with effective mitigation measures and monitoring programs, mineral exploration and development activities can co-exist with sustainable development in caribou calving / post-calving grounds and access corridors.

Sabina believes that existing rights must be grandfathered and is in agreement with Indigenous and Northern Affairs Canada (INAC) that the grandfathering of existing rights on all stages of mineral exploration and development without exceptions should be included in the Nunavut Land Use Plan.

Sabina has concerns with the number, size and positioning of many Protected Areas and how these will negatively affect development while adding little more protection than a Special Management Area can provide. The Protected Areas will almost entirely eliminate potential development in key areas and thus the economic opportunities for Nunavummiut. This is a common view with the Kitikmeot Inuit Association and Government of Canada, amongst others, expressing similar concerns. During the September workshop the Government of Canada described the restrictions and requirements for territorial infrastructure in the plan to be "...overly restrictive, given the potential for ...infrastructure development to provide opportunities and benefits to Nunavut."

3 Specific Comments and Recommendations

3.1 Site 159 within Bathurst Inlet

3.1.1 2016 Draft Nunavut Land Use Plan, Section 2.2.1.4, Protected Area 159 & 2016 Errors & Omissions Document

2016 Draft Nunavut Land Use Plan - Pages 27 & 79

2016 Errors & Omissions received December 14, 2016 - All

3.1.2 Comment

The Proposed Back River Project interacts with proposed Site 159 within Bathurst Inlet. In August, after review of available Scientific and Traditional Knowledge, Sabina brought forward a concern to NPC that the selected Site may not be based on evidence. On December 14, 2016 NPC released an Errors and Omissions summary which included the removal of Site 159 within Bathurst Inlet from Schedule A.

2016 Draft Nunavut Land Use Plan

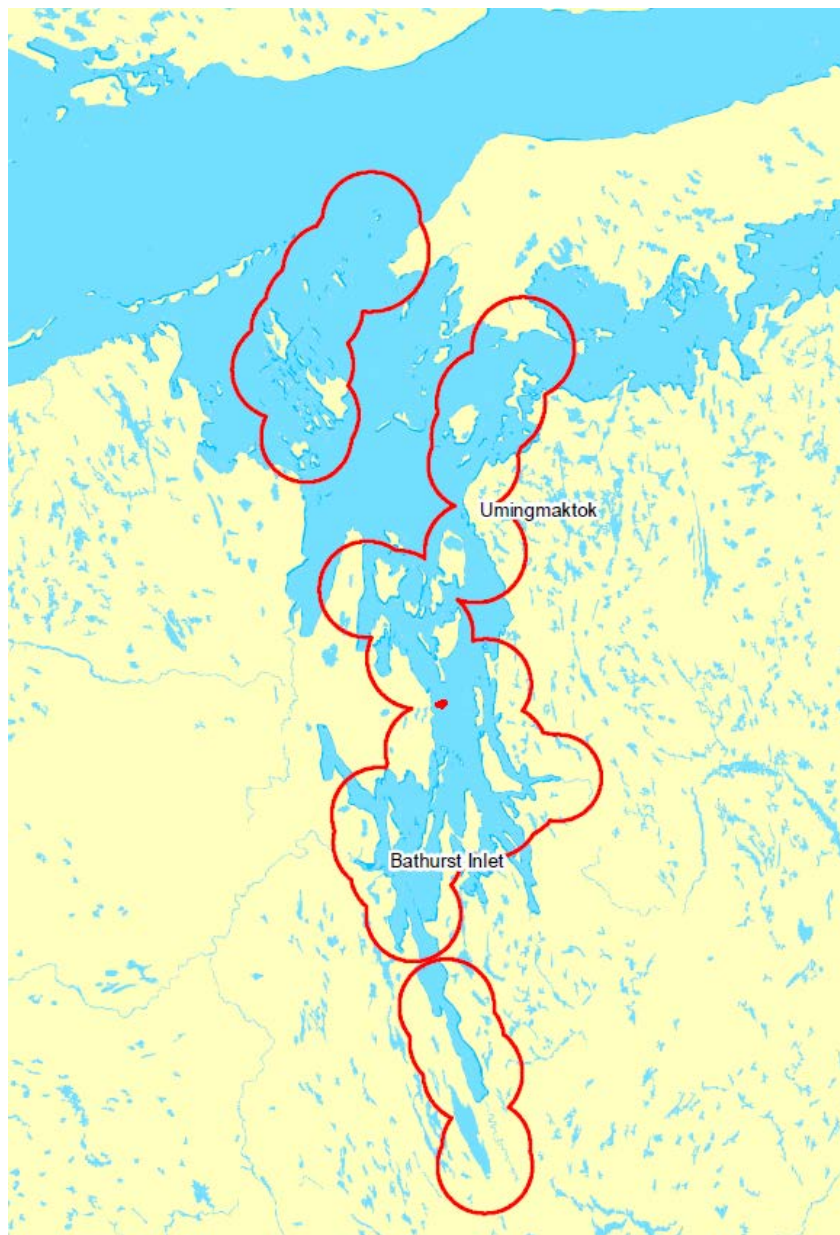
Page 27 states that “Freshwater caribou crossings are assigned a Protected Area Land Use Designation that prohibits all uses, with the exception of marine shipping between Chesterfield Inlet and Baker Lake. [See Schedule A and Table 1 – Site #159]

Page 79 States that Protected Area 159 is a Freshwater Caribou Crossing and prohibited uses include:

- Mineral Exploration and Production;
- Oil and Gas Exploration and Production;
- Quarries;
- Hydro-electrical and related infrastructure;
- Permanent tourism-related structures;
- Linear Infrastructure; and
- Related research except Non-exploitive Scientific Research

2016 Errors & Omissions

<http://www.nunavut.ca/files/2016%20DNLUP%20Errors%20and%20Omissions.pdf>



NO.	Topic	Location	Error/Omission	Correction
3	Freshwater Caribou Crossings	Schedule A	Several caribou marine crossings in Bathurst Inlet area are incorrectly identified as freshwater crossings.	Areas illustrated on Map #2 should be removed from schedule A.
4	Freshwater Caribou Crossings	2.2.1.4; Schedule A	Text incorrectly references a 20km buffer around caribou freshwater crossings.	The buffer that has been included is actually 10km, which is illustrated on Schedule A.

3.1.3 Recommendation

Sabina requests that NPC confirm that Site 159, as presented in the 2016 Errors and Omissions document is to be removed from Schedule A as noted in the Errors and Omissions document.