



October 8, 2021

Jonathan Savoy
Nunavut Planning Commission
P.O. Box 2101
Cambridge Bay, Nunavut X0B 0C0
Email: jsavoy@nunavut.ca

RE: Comments on the 2021 Draft Nunavut Land Use Plan

Dear Mr Savoy,

Sabina Gold and Silver Corp. (Sabina) is a Canadian owned precious metals company developing the Back River Gold Project in the Kitikmeot region of Nunavut. Sabina also holds various other interests in the area including the George Advanced Exploration Project, a royalty interest in the Hackett River Project, and various other exploration claims.

Sabina has had an opportunity to advance an initiation review of the Draft Nunavut Land Use Plan (DNLUP) released in July 2021 and have produced some initial comments for the Commissions consideration.

Timelines & Consultation

Based on available information Sabina finds that the Nunavut Planning Commission (NPC) approach to establishing the DNLUP is rushed. There has been little consultation since the process was frozen in 2018. NPC provided an updated DNLUP in July and intends to move straight into hearings in November. Prior to the commencement of hearings there is one opportunity for formal submissions and no in person community engagement. It is unclear how previous concerns were addressed or even if they were addressed. Sabina recommends the Commission allow for sufficient time for communities, Inuit organizations, proponents, and all those potentially affected by the DNLUP to further consider the Plan.

Existing Rights

Existing Rights proposed in the DNLUP, and more specifically in Appendix A, lack the detail necessary to ensure that current activities, and those which are advancing, may continue. None of Sabina's assets are identified in Appendix A even though some of our activities may interact with protected areas. In addition, there is no clarity on the physical area that Existing Rights

extend to. Do Existing Rights include only a project which has a Project Proposal submitted? Do Existing Rights apply to Project Development Areas, Local Study Areas, or Regional Study Areas? Do Existing Rights include alternatives as presented in other processes such as at the Nunavut Impact Review Board or Nunavut Water Board.

Limited Use Polygons

The DNLUP utilizes Limited Use Areas (Areas or LUAs) to protect various wildlife areas in Nunavut. These most commonly include Areas for caribou, birds, and marine mammals. Although we can all agree that working together to ensure wildlife populations remain strong is in the best interest of Nunavummiut the widespread use of LUAs to protect these species is too overarching. With respect to caribou, NPC is utilizing historical (approximately 10 year old) data, and limited Inuit Qaujimajatuqangit and Traditional Knowledge (IQ and TK) to identify the size, shape, and location of related LUAs. The Areas are not time depended for many activities – e.g. even if caribou utilize an LUA for post calving for 10-14 days the DNLUP limits the majority of activities for the entire year. In addition, IQ, TK, and science tell us that caribou do, and will continue to, alter their use of the land over time. The use of fixed LUAs neglects the fact that things will change and the DNLUP is much too inflexible to account for adjustments in use. Allowing the Migratory Birds Act, Wildlife Act and Nunavut Impact Review Board to consider the potential effects and require proponents to meet Mobile Protection Zones and other Protect Measures is the most appropriate way to deal with any LUA which may adjust over time.

Sabina will continue to investigate the DNLUP, and I look forward to making a further presentation during the upcoming hearings schedule for Cambridge Bay in late November.

Yours truly,



Matthew Pickard
Vice President, Environment & Sustainability
Sabina Gold & Silver Corp.