



Appendix I

Template for Responses/Comments to any written submission

Please return completed templates by **5PM EASTERN TIME FEBRUARY, 24th, 2023** to the Nunavut Planning Commission,
by email at submissions@nunavut.ca, by fax at 867-979-3443, or by mail at Box 1797, Iqaluit, Nunavut X0A 0H0.

IDENTIFICATION	
Date	February 10, 2023
Your Name:	Merle Keefe
Your Title/Position	Manager, Environmental Permitting
Your organization (if applicable):	Sabina Gold & Silver Corp.
Your Contact information (email, Tel, mail, or fax):	mkeefe@sabinagoldsilver.com

**Add enough rows and pages as needed*

	NPC REGISTRY FILE #	SECTION OF THE SUBMISSION	YOUR RESPONSE/COMMENT
1	NIRB File No.: 12MN036; NWB File No.: 2AM-BRP1831; AANDC File No.: N2012T0025; NIRB File No.: NIRB03UN113	Appendix A (Existing Rights), Section 5.1 (Mineral Potential), Section 5.3 (Transportation and Communication), Section 6.1.8 (Existing Rights)	<p>Sabina Gold & Silver Corp. (Sabina) is requesting that it's Back River Project (NIRB File No.: 12MN036; NWB File No.: 2AM-BRP; AANDC File No.: N2012T0025) including the George Lake Property, and the Sabina owned Bathurst Inlet Port and Road (BIPR) [NIRB File No.: 03UN113] be listed in Appendix A of the 2021 Draft Nunavut Land Use Plan (DNLUP).</p> <p>Rationale and Justification Sabina's assets meet all screening criteria presented by the NPC in the DNLUP to be listed within Appendix A, with the exception that our assets currently do not overlap a proposed limited use designation. However, as heard multiple times throughout the public hearings, and detailed within the Commission's responses to pre-submitted questions, the DNLUP as currently proposed may be amended in the future and is subject to legislated periodic reviews in perpetuity going forward. For this reason, Sabina feels it justified to reiterate our request to have our assets listed under Appendix A.</p>



			<p>- Sabina is requesting our assets be listed within Appendix A of the DNLUP – Back River is active, we have mineral rights with the Government of Canada and Nunavut Tunngavik Incorporated, and have been previously reviewed and approved by the comprehensive Nunavut regulatory system – all important criteria the NPC have stated are necessary for Projects to be listed under Appendix A. Sabina is encouraged with the reference NPC made during the Public Hearings in Cambridge Bay, about reviewing the listing within Appendix A and believes this review should consider Sabina’s assets as outlined in Sabina’s numerous submissions.</p>
2	2021 Draft Nunavut Land Use Plan	All Sections	<p>The existing Nunavut Impact Review Board process is very detailed, ensures input for all levels of government, communities, Inuit, hunter and trapper organizations and Inuit organizations. Proponents work through the detailed review process by submitting an environmental assessment that is circulated to all participants, they conduct numerous community visits and consultations and incorporate Inuit and community feedback into their plans and processes proposed to NIRB. They then take part in numerous technical sessions and public hearings organized and administered by the NIRB.</p> <p>Through all these process steps, Proponents are developing and refining management plans that show how their site’s will operate, how they will ensure the environment and wildlife will be protected, and how Inuit career and training opportunities will be implemented. These plans are developed with communities, Inuit, Inuit associations and Governments. This ensures the plans consider the feedback of all parties, incorporate feedback into real actions in the plans, and ensure public review processes to ensure companies are held accountable for implementing the plans. This process of developing plans, consulting and engaging the public and regulators often and continuously ensures that responsible plans are developed, monitored and reviewed on an ongoing basis to ensure they are appropriate for an operation and the communities nearby.</p> <p>Once these Management Plans are developed and Projects are approved to proceed, Proponents are responsible for adhering to these plans. To confirm Proponents are adhering to these plans, frequent inspections by the designated Inuit Organization, the NIRB, and the Federal Government may occur. Additionally, Proponents submit annual reports detailing how they are in compliance with the terms and conditions set out for by the NIRB and Inuit, which are reviewed in great detail by those same parties and members of the public.</p> <p>Much has been heard about the importance of economic development and the need for strong environmental protection measures in the land use planning process. Sabina shares this vision. We have a Project Certificate from NIRB that governs our activities, frequent inspections from the KIA and federal regulatory bodies to ensure we operate in compliance with our permits and approvals. Working with the KIA, Sabina will establish an “Inuit Environmental Advisory Committee” to help in our work to sustainably develop the Back River Project. We continue to actively engage Kitikmeot Communities in our Project planning with over 300 engagements since 2011. Further, we continue</p>

			<p>to encourage and welcome feedback on how we can build an operation that reflects the needs and aspirations of Kitikmeot Inuit.</p> <p>It is for these reasons that we believe the Commission should consider the land use plan in the context of the existing regulatory system in Nunavut. Strong measures for the protection of the land, sea, and wildlife exist and the plan should not replace these tried and tested measures. Rather the plan should complement existing processes to ensure that lands in Nunavut can be protected, conserved, and developed for the long term benefit of Nunavummiut.</p>
--	--	--	--