



Kugaaruk

- Ground disturbances including land use activities for camps, infrastructure, equipment, winter roads and trails.
- Fuel and Chemical storage including Chemicals of Potential Concern inventory (COPC), fuel and chemical usage, and spill records.
- Drilling programs, locations, and methods.



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- Water use and effects on water.
- Wildlife interaction, data logs, and summaries.
- Waste disposal, waste management practices, inventory of waste on site, and inventory of hazardous materials or non-combustible waste removed from site.
- Closure and reclamation progress associated with waste management, drilling, and ground disturbance along with associated costs.
- General information on annual inspection activities by staff and other agencies and their results, community consultations, future exploration work plans, submissions to NIRB, NWB, or NPC or other regulators related to mining activity, archaeological sites and burial grounds, and any incidents of storage or possession of alcohol and drugs on site.

B2Gold Nunavut has provided the KIA with the **Back River Project 2023 Annual Report for KIA Framework Agreement** in accordance with Appendix A to Schedule 3.1 of the Framework Agreement. This report is separate from the **Back River Project 2023 Annual Report for Project Certificate No. 007**, which was submitted, to NIRB.

The socio-economic impact of the project on affected communities of Nunavut is covered by the IIBA, which is summarized here.

Inuit Impact and Benefits Agreement (IIBA) – Summary.

On April 20, 2018, the Kitikmeot Inuit Association (KIA) and Sabina Gold & Silver Corp. entered into a comprehensive Framework Agreement for the development of the Back River Project area, which includes the Marine Laydown Area (MLA), Winter Road, and the Goose Lake advanced exploration camp, among other exploration and development targets. The Agreement is intended to provide long-term benefit and certainty to Inuit beneficiaries, long-term development, and tenure certainty to Sabina.

One of the major features of this comprehensive agreement is a publicly available Inuit Impact and Benefit Agreement (IIBA) for activities in the Back River Project area, which addresses socio-economic interests of Inuit in the region, including employment, contracting, and training.

The purpose of the IIBA is to satisfy requirements under article 26 of the NLCA with respect to Back River Project area. It is intended by the IIBA to provide benefits to Inuit arising from Sabina's operations that may fall below the threshold of a Major Development Project.

Under the IIBA, Sabina, now B2Gold Nunavut, has a commitment to inform the KIA on a regular basis on both the socio-economic and ecosystem effects of their operations in the Kitikmeot region. Socio-economic effects are reported on a



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regular and timely basis through the IIBA Implementation Committee, B2Gold Nunavut Liaison, and the IIBA Manager. Ecosystem effects is be reported through the Inuit Environmental Advisory Committee (IEAC) once established.

The Implementation of the Back River IIBA and the establishment of the Back River IIBA implementation Committee was accomplished on December 12, 2022. The KIA and B2 Gold Nunavut have had seven IIBA IC meetings to date. The IEAC was formally established in July 2023 and will meet again later in June 2024.

The 2023 Socio-Economic Monitoring Report submitted to NIRB was reviewed by KIA. The previous matters discussed in 2023 with B2 Gold Nunavut on its socio-economic plan, guidance for incorporating community perspectives, traditional knowledge in the monitoring, and outfitting/guiding business consultation were reflected in the 2023 Socio-Economic Monitoring Report. KIA's specific comments and recommendations on this report are included in Section 2, Effects Monitoring b)."

Inspection of Back River Project

The KIA conducted its site inspection the Back River Project from August 7 to 10, 2023. The KIA had conducted its inspection of Goose Lake Camp, the Marine Laydown Area (MLA), and George Lake Camp with B2Gold Nunavut staff. KIA's internal report were provided to B2Gold Nunavut.

Internal Report on Back River Project – August 7 to 10, 2023

Summary

The inspection of Goose Lake Camp, Marine Laydown Area (MLA) facilities, and George Lake Camp was conducted from August 7 to 10 as per established inspection schedule. John Roesch and Katrina Hatogina of KIA, and Merle Keefe of B2Gold Nunavut had conducted the inspection. Eighty-six (86) site components out of 86 components were inspected in accordance with KIA's established schedule at all three locations.

Overall, the Goose Lake Camp and MLA are being maintained in good condition while furthering development of the mine site. The Umwelt access road still needs to be raised to 1.5 metres in height. The two temporary bridges have been removed and replaced with culverts. Weirs will be installed in six to eight locations to slow the flow of water and to provide places for Char to rest when going up stream. Culverts at Echo crossing will be removed, and a berm will be constructed for the contact water pond adjoining Umwelt Road. The culverts will be moved to the other



side of the diversion berm and more culverts will be added. Echo pit is across from the diversion berm.

The camp is open and is still under construction. The milling and processing plant is being built. Snow fencing has been installed around the portal to prevent snow accumulation. A berm has also been constructed to prevent water inflow into the portal and a sump has been installed to collect freshet water.

The 10 ML tank and liner is installed, and the pad is being extended for a second 10 ML tank. The permitted land farm is next to the mine site pad near the 10 ML tank. Priority should be given to its construction for the remediation of contaminated soil.

The MLA is in good condition, but its pads and roads need to be regraded. Barges were present unloading supplies and equipment. The new camp accommodations with sleeping quarters, dry, washrooms, and kitchen are in good condition. All offices have been consolidated into the Office Building which has been partitioned inside. The building has been jacked up and leveled.

The George Lake Camp is in good condition and substantial clean-up and organization has taken place. Further reorganizing and cleanup is expected. Scrap metal, drilling oil and transmission fluid, crushed drums still need to be backhauled from site. The old core storage will be relocated to the new core storage area as per CIRNAC's request to B2Gold Nunavut. Old pallets should be backhauled or reused.

A new airstrip should be built away from the camp and the old airstrip repurposed for reorganizing the camp. The road to the new core storage site should be built up and a culvert added where water flows over the road.

1) Compliance Status

In 2023, B2Gold Nunavut engaged in several activities such as:

- Ongoing construction of the plant site, mill, and truck shop at the Goose property.
- Phase 1 of the accommodations complex at the Goose property was completed in July 2023, including sleeping quarters and kitchen.
- The Goose mine camp sewage treatment plant was commissioned in Q3 of 2023.
- Construction of the primary pond at the Goose property was initiated.
- The concrete batch plant and a fully automated rebar cutting and bending machines became operational at the Goose property.
- Earthworks were carried out to extend the Goose airstrip.
- Echo Pit prestripping continued.



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- Continuing advancement of the Vault Underground decline.
- The Rascal Stream upgrade crossing at the Goose property was completed to accommodate haul truck traffic.
- Llama and Umwelt lakes and upstream waterbodies were fished out in preparation for future dewatering.
- Over 800 loads were transported on the WIR during the 2022/2023 winter season.
- The fuel tank containment area at the MLA was enlarged to facilitate additional storage.
- The MLA was reorganized to maximize space for the 2023 sealift unload.

Overall, B2Gold Nunavut. is following its permits, licenses, and agreements.

KIA's consultants find that B2Gold Nunavut has presented adequate information to demonstrate that the Back River Project has complied with project certificate terms and conditions.

2) Effects of Monitoring:

a) Whether the conclusions reached by B2Gold Nunavut in the 2023 Annual Report Are Valid.

KIA's consultants in the areas of wildlife, fisheries, water quality, and geotechnical engineering reviewed the 2023 Annual Report for Back River Project Certificate NIRB no, 007 and the following documents:

- Appendix A. Figures.
- Appendix B. Community Engagement Notes.
- Appendix C. 2023 Socio-Economic Monitoring Report.
- Appendix D. Ground Thermal Monitoring Plan.
- Appendix E. 2023 Annual Geotechnical Inspection Report.
- Appendix F1. 2021 Aquatic Baseline Report.
- Appendix F2. 2022 Aquatic Baseline Report.
- Appendix G. RSW Culvert Installation Construction Monitoring Report.
- Appendix H. Downstream Assessment of Goose Lake Water Withdrawal Increase on Arctic Grayling.
- Appendix I. 2023 Pre-Shipment Equipment Cleaning.
- Appendix J. Vegetation Survey Photos.
- Appendix K. 2023 WMMP Report.
- Appendix L. 2023 Marine Sampling Report.
- Appendix M. Socio-Economic Monitoring Plan.



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- Appendix N. Community Engagement Plan.
- Appendix O. Inuit Business Development Plan.
- Appendix P. Stakeholder Grievance Mechanism.

Overall, our consultants find B2Gold Nunavut's conclusions in the 2023 Annual Report are valid, with a most of the Project Terms of Conditions being met.

Our consultants comments and recommendations concerning these project certificate conditions will be presented in the next section of our response to NIRB.

- b) **Any areas of significance requiring further supporting information or changes to the monitoring program, which may be required.**

1.0 Back River 2023 Annual Report to NIRB

1.1 KIA-NIRB-01

Review Comment Number	KIA-NIRB-01
Subject/Topic	Vegetation Monitoring Plan, 86% reduction in plots
References	Back River NIRB 2023 Annual Report, V. 1 <ul style="list-style-type: none"> • Section 4.5.9, Vegetation Monitoring Plan • TC No. 34
Summary	Project Condition No. 34 includes reporting on inspections and monitoring results in annual report.
Detailed Review Comment	<p>The reporting requirements of TC No. 34 is that:</p> <p><i>"The Proponent shall have in place a Vegetation Monitoring Plan that is designed to quantify the potential impacts on vegetation from the Project, including the annual construction/operation of the winter ice roads and trails. The plan should include all commitments discussed throughout the Review of the Project, including commitments to consult with the Kitikmeot Inuit Association, the Government of Nunavut, and other relevant parties, as well as:</i></p> <p><i>a. Establishment of pre-construction and post-operation vegetation conditions annually with supporting photographs to allow for long- term comparisons of vegetation conditions along winter ice road/trail routings and around project sites;</i></p> <p><i>b. Incorporation of measures to prevent or minimize potential destabilization and erosion along winter ice road/trail routings and</i></p>



	<p>around project sites;</p> <p><i>c. Details on the triggers for implementing adaptive management options if effects to vegetation are observed, including potential impacts from dust deposition; and,</i></p> <p><i>d. Discussion of how the findings from monitoring efforts would be used to inform reclamation planning."</i></p> <p>The results presented for 2023 in the annual report show that, out of 72 paired plots established in previous years, only 10 experimental plots were monitored. The rest of the plots were lost due to the WIR construction and a change in alignment. While the self-reporting in the annual report indicates that the program was compliant, this drastic reduction in plot numbers does not enable the quantification of potential impacts on vegetation from the project, interferes with establishment of pre-construction and post-construction comparisons, and prevents the evaluation of erosion along the WIR.</p> <p>To remain compliant with this TC, B2Gold needs to plan sufficient vegetation plots, and to be able to receive and respond to project construction changes that impact their ability to meet a term or condition. In this case, the loss of most of the plots threatens the success of the vegetation monitoring program to be able to meet TC No. 34. In 2023, B2Gold would be considered non-compliant or only partially compliant with the TC reporting requirements.</p>
Recommendation/ Request	<p>The loss of most vegetation monitoring plots in 2023 edges towards non-compliance for TC # 24. The KIA requests the following:</p> <ul style="list-style-type: none"> • A submission of an updated vegetation monitoring plan with additional, paired vegetation monitoring plots to compensate for the majority that were lost from the program. • An explanation of how B2Gold will meet the commitment to "quantify the potential impacts on vegetation from the Project, including the annual construction/operation of the winter ice roads and trails." And for the "Establishment of pre-construction and post-operation vegetation conditions annually" given the loss of most of their monitoring plots due to the change in WIR alignment. • An explanation of how data will be analyzed to reach conclusions of impacts to compare pre- and post-construction conditions now that most plot locations will be changed and their ability to conduct a BACI design and analysis, or even a CI design and analysis, is now greatly compromised. • Given that the design of the vegetation monitoring program has been compromised, how will B2Gold ensure that they are conservative with their interpretation of vegetation impact data and the potential for the project to have caused effects going forward?
Importance	High



1.2 KIA-NIRB-02

Review Comment Number	KIA-NIRB-02
Subject/Topic	Wildlife Mitigation Measures for Attractants
References	Back River NIRB 2023 Annual Report, V. 1 <ul style="list-style-type: none"> • Section 4.5.10, Terrestrial Wildlife and Wildlife Habitat • TC No. 48
Summary	The annual Report TC No. 48 includes results of attractant management mitigation to minimize potential impacts to wildlife from attraction to project infrastructure.
Detailed Review Comment	<p>The objective of TC No. 48 is that <i>“The Proponent shall develop and implement mitigation measures and monitoring programs to limit the attraction of predators and scavengers to Project facilities, and to limit impacts from specific project activities”</i>.</p> <p>The reporting requirement is to include <i>“Information regarding mitigation measures implemented and/or updated by the Proponent in fulfillment of this Term and Condition shall be included in Wildlife Mitigation and Monitoring Program Plan (WMMPP) and in the Proponent’s annual report to the Nunavut Impact Review Board”</i>.</p> <p>While B2Gold has met their reporting commitments, it is unfortunate that two wolverines, species at risk, had to be euthanized following attraction to the incinerator. This appears to have been due to consequence poor attractant management implementation (buildup of attractants and leaving the door open) at the incinerator facility. This issue of wolverines entering the facility and acting aggressively was noted in the previous annual report and technical comments from the KIA urged for urgency in additional adaptive management to correct underlying causes. This issue escalated in severity since prior years and was not resolved. As such, it is difficult to agree with the conclusion of compliance for the objective of <i>“The Proponent shall develop and implement mitigation measures and monitoring programs to limit the attraction of predators and scavengers to Project facilities, and to limit impacts from specific project activities.”</i></p>
Recommendation/Request	<p>B2Gold needs to demonstrate that they are properly implementing mitigation and have implementation checks and adaptive management procedures in place to quickly intervene when systems are not working and to prevent ongoing issues leading to wildlife mortalities. Previous incidents and technical comments from the KIA do not appear to have been ascribed the importance or urgency they deserved, culminating in the mortalities of two Species at Risk.</p> <p>In addition to written comments in response, the KIA would like to</p>



	have a meeting with B2Gold after the submission of technical comments to hear about how B2Gold is addressing concerns at the site with those directly involved in operations on the ground at these facilities.
Importance	High

1.3 KIA-NIRB-03

Review Comment Number	KIA-NIRB-03
Subject/Topic	Wildlife Incident Reports, 2023
References	Back River NIRB 2023 Annual Report, V. 1- App K. WMMP <ul style="list-style-type: none"> App K WMMP - Appendix G, Terrestrial Wildlife and Wildlife Habitat
Summary	A bird mortality of a short-eared owl was included in Appendix G-7 of Appendix K (WMMP Report) in 2023. The incident describes a short-eared owl that was found dead near the transfer conduit. The cause of death was assumed to be contact with the transfer conduit, which may be a simplistic assumption of causation.
Detailed Review Comment	A short-eared owl was found deceased beside the transfer conduit, and the assumed cause of death was “contact with the conduit”, which rests 24-30 inches off the ground. The reviewer finds it difficult to believe this is a case of a straightforward strike with an object. Owls have “binocular” vision, with acute depth perception that allows them to gauge distance to perfectly time their attacks. Owls have proportionally large eyes compared to most other species in the animal kingdom and their pupils dilate extremely widely to bring in light in low light, nocturnal and foggy conditions. On top of this, they have extremely light-sensitive cells in their retinas (owls have a ca. 33% higher rod: cone ratio compared to humans). Along with their superior vision, owls have evolved wing structures that make them extremely agile flyers with the ability to swiftly brake and change directions. These factors make them unlikely to collide with things, and without other contributing factors, it would be highly unusual for this species to simply crash into something without seeing it and being unable to quickly stop or turn to avoid it. Prior experience by the reviewer has often found poisoning and/or avian disease to be a causal factor of mortalities due to disorientation in this group. Owls are frequently poisoned due to their position on the food chain eating small mammals that have ingested contaminants. They have also been shown to be susceptible to chemical inhalation. Finally, because this species migrates, it may have been exposed to diseases such as pigeon herpesvirus (Columbid herpesvirus-1; CoHV-1) or avian flu. Factors such as inhalation of gases, consumption of toxins and/or disease



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	(e.g., CoHV-1, avian influenza) can lead to an owl or other bird species becoming disoriented and colliding with an object.
Recommendation/ Request	<p>If owls (or other raptors/waterfowl/geese) are found dead at sight, please send them for a necropsy to rule out inhalation and consumptive poisoning and to test for avian diseases such as CoHV-1 or avian flu. Such information will be important for adaptive management.</p> <p>We note that, as researchers seek to establish the current range of the very contagious avian flu in the Arctic, which can be transferred to humans, such information will also be vitally important for informing Inuit of areas where they should avoid bird and egg harvest.</p>
Importance	High

1.4 KIA-NIRB-04

Review Comment Number	KIA-NIRB-04
Subject/Topic	Calculations of caribou UD overlap with PDA
References	<p>Back River NIRB 2023 Annual Report, V. 1- App K. WMMP</p> <ul style="list-style-type: none"> • App K WMMP – Table 3.4-2
Summary	Table 3.4-2 summarizes the overlap of the Back River PDA (Goose and MLA combined) with Bathurst and Beverly/Ahiak seasonal range UDs, 2023.
Detailed Review Comment	<p>The amount of overlap calculated between the PDA and caribou seasonal utilization distributions are very small, with most registering at 0% at the 3 decimal point level of significant digits. The relatively highest overlap is between the PDA and the Bathurst herd's 50% UD during spring migration (0.071% overlap).</p> <p>The numbers shown in Table 3.4-2 are helpful, but it would be much more realistic and meaningful to include additional calculations for the percentage overlap between the ZOI, or distance at which mitigation is triggered, and these UDs. This would be the more meaningful percentage that accounts for direct and indirect habitat loss or functional habitat quality reduction for each of these herds.</p>
Recommendation/ Request	Please include percentages for both UDs overlap with the PDA as well as the PDA + zone of influence in present and future analyses.
Importance	High



Review Comment Number	KIA-NIRB-05
Subject/Topic	in WMMPP
References	<p>Back River NIRB 2023 Annual Report, V. 1</p> <ul style="list-style-type: none"> • Section 4.5.10, Terrestrial Wildlife and Wildlife Habitat • TC No. 39
Summary	The annual Report TC No. 39 includes a next steps section that references the wrong project phase.
Detailed Review Comment	The annual report summary below the table for TC No. 39 states that “B2Gold Nunavut will continue to utilize the updated WMMPP (Version 12, April 2023) to conduct mitigation and monitoring relevant for the Pre-Construction Phase of the WMMP Plan...”. This should read Construction Phase, as the project has now entered the official construction phase.
Recommendation/Request	Please modify the Next Steps section on Page 4-96 from Pre-construction to construction.
Importance of Issue	High

Review Comment Number	KIA-NIRB-06
Subject/Topic	Reporting on progressive reclamation of vegetation, or that none has Been done.
References	Back River NIRB 2023 Annual Report, V. 1 <ul style="list-style-type: none"> Section 4.5.9 Vegetation, Site Footprint
Summary	The Term or Condition #32 associated with Project Certificate requires the proponent to account for the current project footprint considering construction and progressive reclamation activities; the latter is not commented on.
Detailed Review Comment	<p>The reporting requirement for TC 32 is:</p> <p><i>“In the Proponent’s annual report to the Nunavut Impact Review Board, the Proponent shall provide information regarding the current Project footprint, taking into account construction and progressive reclamation activities, and including information regarding the loss or alteration of vegetation associated with Project activities (including identifying the type of any habitat losses resulting from these effects)”.</i></p> <p>There is no comment on progressive reclamation attempted or</p>



	initiated at temporarily disturbed sites. While the KIA recognizes that B2Gold has likely not initiated any, progressive reclamation is meant to be initiated as early as possible (e.g., It could be initiated along the former alignment of the Winter Ice Road now that the alignment has been adjusted). If no progressive reclamation has been initiated, please report that within the annual report. However, as there was a great deal of uncertainty about how well various approaches to progressive reclamation would work – given the long time periods for vegetation growth in the Arctic, pilot projects to test various methods may best be initiated soon to inform subsequent progressive reclamation and reclamation/revegetation at closure.
Recommendation/Request	Please include information on any progressive reclamation activities initiated or planned in each annual report.
Importance	Moderate

1.7 KIA-NIRB-07

Review Comment Number	KIA-NIRB-07
Subject/Topic	Monitoring for Invasive Species SOP Compliance
References	Back River NIRB 2023 Annual Report, V. 1 <ul style="list-style-type: none"> Section 4.5.9, Invasive Species
Summary	Project Condition No. 33 includes reporting on inspections and monitoring results in annual report.
Detailed Review Comment	<p>The reporting requirements of TC No. 33 is that: <i>“At least 30 days prior to first shipment of equipment and supplies to the site, the Proponent’s mitigation plans, protocols, monitoring and inspection program required in fulfillment of this Term and Condition shall be provided to the Nunavut Impact Review Board for review. Subsequently, information regarding inspections, monitoring results and any reports to the Government of Nunavut Department of Environment as referenced above shall be included in the Proponent’s annual report to the Nunavut Impact Review Board.”</i></p> <p>The Annual Report Notes that an SOP was provided to the NIRB which <i>“ensures all equipment and bulk samples arriving at the Back River Project site are in a condition free of any soil or plant debris to minimize the risk of introduction”</i>. From the annual report, however, there appears to be no inspections/ monitoring for compliance with the SOP, and no information on results of inspections of equipment or bulk samples are provided in the report to show compliance with the second part of TC NO. 33 <i>“Subsequently, information regarding inspections, monitoring</i></p>



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	<p><i>results and any reportsshall be included in the Proponent's annual report to the Nunavut Impact Review Board".</i></p> <p>[Note: While the proponent notes that the Vegetation Monitoring Plan includes documenting invasive species, the vegetation plots were dramatically reduced to 10 small plots in 2023; See KIA-NIRB-1].</p>
Recommendation/Request	Please include inspections of equipment and bulk samples for compliance with the invasive species SOP. Please report on inspections in future annual reports to show compliance.
Importance	Moderate

1.8 KIA-NIRB-08

Review Comment Number	KIA-NIRB-08
Subject/Topic	Wildlife Monitoring and Adaptive Management Measures to mitigate potential impacts to wildlife through interactions with water attenuation ponds and/or tailings storage areas.
References	<p>Back River NIRB 2023 Annual Report, V. 1</p> <ul style="list-style-type: none"> • Section 4.5.10, Terrestrial Wildlife and Wildlife Habitat • TC No. 47
Summary	The annual Report for TC No. 47 notes that methods for achieving this TC are not applicable because there are no water attenuation ponds or tailings storage areas occurring at the project currently.
Detailed Review Comment	While there are currently no water attenuation ponds and tailings storage areas, there soon will be in the latter part of 2024/2025. The current WMMP would need to be updated this year to include deterrence and monitoring of deterrence effectiveness for these features. Currently, Section 7.1.10 and 11.1.8 of the WMMP describe the water quality monitoring of these water features and mitigation to exclude caribou, other large mammals and waterbirds if required, but there is not a clear adaptive framework showing which deterrence would be used if required. More importantly, details are not presented on monitoring of the effectiveness of these systems, including methods, frequency, efforts, and adaptive feedback into the program. An update of these sections in anticipation of potentially contaminated water on site is required in preparation of operations.
Recommendation/Request	Please update the WMMPP to provide a plan that addresses this TC fully, including effectiveness monitoring and adaptive feedback. Please provide this update to the KIA prior to construction resulting in water attenuation ponds and the TIA.



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Importance	Moderate
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1.9 KIA-NIRB-09

Review Comment Number	KIA-NIRB-09
Subject/Topic	Watercourse crossing
References	Annual Report to NIRB, Project Certificate Condition No. 24
Summary	In 2023, as per Phase 1 of construction in the Water Management Plan, the RSW crossing upgrade was completed by replacing the bridge crossing on the primary and secondary RSW channels with culvert designs.
Detailed Review Comment	Although replacement of the clear-span bridge was approved by DFO, it is not clear why the bridge needed to be replaced or why culverts were selected to replace it. Construction and operation of the bridge had no effects on fish or fish habitat, whereas construction of the culverts required in-stream works, including a diversion berm and secondary channel culvert, and presumably the primary channel culverts were placed in the middle of the former stream channel if they are open-bottom culverts. No mention of permanent fish habitat loss is mentioned due to the footprint of the culverts. If the culverts are closed-bottomed, there would be 100% fish habitat loss.
Recommendation/Request	Provide reasoning for replacement of the clear-span bridge with two culverts. Provide the amount of fish habitat loss due to the footprint of the culverts.
Importance	Low

1.10 KIA-NIRB-10

Review Comment Number	KIA-NIRB-10
Subject/Topic	Fish passage
References	Annual Report to NIRB, Project Certificate Condition No. 25
Summary	A proposed 'fishway' (or diversion) is to be constructed while the airstrip is extended to divert flows from Rascal Stream East to Rascal Stream West. DFO's main concern is downstream effects on velocities, particularly during spring conditions when adult Arctic Grayling migrate to upstream spawning habitats in Rascal



	<p>Stream.</p> <p>Specific locations immediately upstream of the crossing (Rascal Stream West Reach 1) were identified as having high velocities under a baseline case that may exceed fish passage criteria under a diverted flow scenario. Therefore, 14 in-stream rock weir structures were constructed that reduced velocities, on average, by 34%, and increased depths by 19%.</p>
Detailed Review Comment	<p>It is not stated whether the reduction in stream velocities due to the rock weirs will reduce flows to below fish passage criteria under a diverted flow scenario for all flow conditions.</p> <p>It is stated the next step is to install the Rascal Stream diversion channel, then monitor flows and fish movements under spring flow conditions to evaluate the effectiveness of the mitigation measures. However, the next step should be monitoring during spring conditions to determine effectiveness, prior to construction of the diversion channel.</p>
Recommendation/Request	<p>Provide spring flow measurements in the modified sections to determine if the rock weirs will reduce flows to below fish passage criteria under a diverted flow scenario for all flow conditions, prior to construction of the diversion channel.</p>
Importance	Moderate

1.11 KIA-NIRB-11

Review Comment Number	KIA-NIRB-11
Subject/Topic	Water withdrawal effects on Arctic Grayling
References	Annual Report to NIRB, Project Certificate Condition No. 25, Appendix H - Downstream Assessment of the Goose Lake Water Withdrawal Increase on Arctic Grayling Spawning and Rearing Habitat
Summary	<p>DFO identified a potential downstream risk of causing a HADD (harmful alteration, disruption, or destruction) to Arctic Grayling habitat at the Goose Lake Outlet channels (i.e., Goose Lake Outlet and Propeller Lake Inlet reaches) resulting from changes in channel flow conditions due to proposed water withdrawal from Goose Lake. Hydrological conditions were modelled for two scenarios for the Goose Lake Outlet channels, including baseline and Project-related flow scenarios. The assessment concluded there is the potential for residual effects to fish habitat, but that effects to the local Arctic Grayling population would be low (likely non-measurable) in magnitude. Residual effects, if any, would be reversible during the closure phase of the Back River Mine once water withdrawals for milling are no longer required.</p>



Detailed Review Comment	<p>It is stated in Section 4.1 of Appendix H that the observed late summer flows in 2011-2014 and 2022 are lower than the FEIS calculated baseline flows and fall below the baseline 30% MAD. A caveat is then added that the observed flows demonstrate the natural variability from year-to-year within the watershed and the resulting flows may not be representative of the long-term average climate. However, climate change has not been considered in this study, even though current findings show the Canadian Arctic is warming at approximately three times the global rate.</p> <p>It is necessary to revisit the water flow conditions under the current climate change conditions for each scenario presented in the report.</p>
Recommendation/Request	Provide the results for the two modelled flow condition scenarios, baseline and Project-related altered flow regime, accounting for changes due to climate change. These scenarios need to be assessed for the entire lifespan of the Project.
Importance	Moderate

1.12 KIA-NIRB-12

Review Comment Number	KIA-NIRB-12
Subject/Topic	Water withdrawal effects on Arctic Grayling
References	Annual Report to NIRB, Project Certificate Condition No. 25, Appendix H - Downstream Assessment of the Goose Lake Water Withdrawal Increase on Arctic Grayling Spawning and Rearing Habitat
Summary	<p>It is stated in Section 2.1 of Appendix H that under the new water withdrawal rate, typical ecological flow conditions (above 30% MAD) for the Goose Lake Outlet and Propeller Lake Inlet are expected to be reduced by 9 to 15 days during the open-water period. It is also stated that this predicted change suitable flow conditions has the potential influence adult spawning behaviour for individuals that utilize the Goose Lake outflows for spawning habitat, shifting the spawning window for adult Arctic Grayling, which can span two to three weeks.</p> <p>The conclusion from these findings states there is the potential for residual effects to fish habitat, but that effects to the local Arctic Grayling population would be low (non-measurable) in magnitude.</p>
Detailed Review Comment	A potential reduction in the spawning window available to Arctic Char from up to 21 days down to only 6 to 12 days, and potential spawning timing changes are very concerning. This reduced time



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	period increases the risk for unsuccessful spawning results for the local population.
Recommendation/Request	Provide information on the availability of other local spawning areas for this population of Arctic Char to determine the degree of impact these predicted changes will have on the population in this system. Depending on the results, revisit the conclusion that effects on the local Arctic Grayling population would be low (non-measurable) in magnitude.
Importance	High

1.13 KIA-NIRB-13

Review Comment Number	KIA-NIRB-13
Subject/Topic	Baseline water quality monitoring
References	Annual Report, Section 4.5.7 Groundwater and Surface Water Quality
Summary	Summary of 2023 data is missing in Appendix F2
Detailed Review Comment	The Annual Report indicates that field programs occurred in 2023 to collect additional baseline water quality data, including open-water water quality sampling in Goose Lake and at the outflow of Goose Lake and various Goose Lake inflows, and that a summary of the 2023 data is provided in Appendix F2. We could not find the summary of 2023 data in Appendix F2 in the project documents posted on the NIRB Public Registry.
Recommendation/Request	Please provide summary of 2023 data in Appendix F2 for review.
Importance	Moderate

1.14 KIA-NIRB-14

Review Comment Number	KIA-NIRB-14
Subject/Topic	Holding times for water quality samples
References	Annual Report, Appendix F – 2021 and 2022 Aquatic Baseline Reports
Summary	Holding times effect on water quality sampling needs to be discussed in greater detail.
Detailed Review	The 2021 and 2022 Aquatic Baseline Reports state that holding



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Comment	<p>times were exceeded for the analysis of various water quality parameters (i.e., pH, nitrite, nitrate, orthophosphate, turbidity, TSS, TDS, alkalinity, sulphide). Holding time exceedances were mainly from 1-7 days in duration and were not anticipated to negatively affect data quality.</p> <p>It would be helpful to provide greater detail on the nature of the holding time exceedances (e.g., what percentage of samples were affected for each parameter, what parameters were affected by greater than 7 day holds), more in-depth discussion of how these delays could affect results (e.g. pH and alkalinity measures may not be reliable after several days), and demonstration of what steps are being taken to address this problem for future sampling.</p>
Recommendation/Request	Please provide additional discussion and analysis of the holding time exceedances in 2021 and 2022 sampling, including more details on the types of exceedances (percentage, length), potential implications for data analysis (e.g., with respect to less stable parameters such as pH) and steps being taken to resolve this ongoing issue.
Importance	Moderate

1.15 KIA-NIRB-15

Review Comment Number	KIA-NIRB-15
Subject/Topic	Reference B Lake total chromium measurement
References	Annual Report, Appendix F – 2022 Aquatic Baseline Report
Summary	Irregular chromium results collected in August 2022.
Detailed Review Comment	<p>Total chromium was reported as above the chronic guideline for the protection of aquatic life in one sample collected in August 2022, but “results from this sample appear to be irregular and are not considered to be representative of Reference B Lake” (p. 9).</p> <p>The report does not discuss possible reasons for this isolated elevated total chromium concentration.</p>
Recommendation/Request	Please discuss possible causes of the elevated total chromium concentration observed in the August sample.
Importance	High



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1.16 KIA-NIRB-16

Review Comment Number	KIA-NIRB-16
Subject/Topic	Turbidity monitoring
References	Annual Report Appendix G – Rascal Stream West Culvert Installation Construction Monitoring Report
Summary	There are gaps in upstream turbidity monitoring.
Detailed Review Comment	Turbidity monitoring was conducted at an upstream background station and multiple downstream stations to monitor effects of in-channel construction of the culverts both during construction (10-17 May) and post-construction (17-25 May). However, there were gaps in monitoring coverage at some of these stations. Reduced construction monitoring occurred at the following downstream locations: DS1.3 and DS2.3 (from May 16), DS3.2 (from May 14), and DS3.3 (from May 16). No post-construction monitoring occurred at the following downstream locations: DS1.1., DS2.1, and DS3.1. It is not clear why there were gaps in the monitoring of these locations.
Recommendation/Request	Please explain why there were breaks in monitoring of the identified downstream locations during construction or post-construction periods and discuss how this missing information might affect monitoring results.
Importance	Moderate

1.17 KIA-NIRB-17

Review Comment Number	KIA-NIRB-17
Subject/Topic	Comparison of baseline vs. observed flows
References	Annual Report Appendix H – Downstream Assessment of the Goose Lake Water Withdrawal Increase on Arctic Grayling Spawning and Rearing Habitat
Summary	Baseline and observed flows are characterized as having non-overlapping data sets with different climatology.
Detailed Review Comment	The report states that “ <i>adjusted regional flows used to characterize the FEIS baseline flows at Goose Lake outlet (1971 to 2011) and observed flows (2011 to 2014, 2021 and 2022) are for the most part, non-overlapping data sets with different climatology. Therefore, caution should be applied in comparing datasets due to natural variability in the climate and therefore hydrograph from year to year</i> ” (p. 5). It is not clear why baseline flows and observed flows are



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	characterized as having “ <i>non-overlapping data sets with different climatology</i> ”. If this is the case, it suggests that the calculations of baseline flow are not representative of current (background) conditions and thus are not useful for the analysis of impacts of the new water withdrawal rate on Goose Lake hydrology. How different are the data sets? Further, does modelling consider the effect of climate change on future flow conditions?
Recommendation/ Request	Please discuss whether FEIS baseline flow data from the 40-year period (1971 to 2011) is representative of current (background) conditions and thus useful for the analysis of impacts of the new water withdrawal rate on Goose Lake hydrology. Please also comment on whether flow modelling incorporates predicted impacts of climate change.
Importance	Moderate

1.18 KIA-NIRB-18

Review Comment Number	KIA-NIRB-18
Subject/Topic	Marine shipping monitoring
References	Annual Report Appendix L– Back River Project: Marine Laydown Area – 2023 Marine Sampling Report Section 3.4 Data Analysis
Summary	Information is required on the handling of RPDs greater than 100%
Detailed Review Comment	<p>The report states that “RPD calculations were only completed when laboratory concentrations were greater than five times the laboratory (RDL). The calculated RPDs were compared to acceptable variance ranges for the program as follows:</p> <ul style="list-style-type: none"> • RPDs greater than 20% were considered significant. • RPDS greater than 100% were subjected to professional judgement.” (p. 9) <p>The report does not explain how professional judgement was used to handle RPDs greater than 100%.</p>
Recommendation/ Request	Please provide more information on how RPDs greater than 100% were handled in the data analysis.
Importance	Low



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1.19 KIA-NIRB-19

Review Comment Number	KIA-NIRB-19
Subject/Topic	Water Quality
References	Back River Annual Project 2023 Annual Report Appendix F1 Sabina Gold & Silver Corp. Back River Project – 2021 Aquatic Baseline Report
Summary	<p>In 2023, water quality in Goose Lake and streams was generally consistent with results from previous years (Golder 2019, 2022; WSP 2023).</p> <p>In 2021 Water Quality data were collected primarily to supplement the AEMP baseline dataset per the recommendations from the Aquatic Baseline Synthesis Report (Golder 2019).</p> <p>Five field programs (one conducted under ice-covered conditions and four during open-water conditions), water quality results were compared to acute and chronic Canadian water quality guidelines for the protection of aquatic life (CCME 1999) and Canadian drinking water quality guidelines (Health Canada 2020).</p>
Detailed Review Comment	Guideline exceedances for several variables were observed at Goose Lake stations, Propeller Lake, and Reference Lake. The report indicates that similar exceedances were noted in data collected in 2019.
Recommendation/Request	KIA suggests inclusion of data comparison tables in the Annual Report for the 2019-2022 data with the monitoring 2023 data to better identify any changes in water chemistry. Time dependent hydrographs should also be developed to identify any trend.
Importance	Low

1.20 KIA-NIRB-20

Review Comment Number	KIA-NIRB-20
Subject/Topic	Downstream Assessment of the Goose Lake Water Withdrawal Increase on Arctic Grayling Spawning and Rearing Habitat
References	<p>Appendix H Downstream Assessment of the Goose Lake Water Withdrawal Increase on Arctic Grayling Spawning and Rearing Habitat</p> <p>Table 4.1: Predicted Baseline and Project Conditions and Average Observed (2011-2014, 2021, and 2022) Hydrologic Indices at</p>



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	Goose Lake Outflow (PN03)
Summary	<p><u>Annual Lake Outflow</u>: Observed Conditions are lower than Calculated Average Condition.</p> <p><u>Peak Daily Lake Outflow</u>: Observed Conditions are higher than Calculated Average Condition.</p>
Detailed Review Comment	<p>The average observed conditions (2011-2014, 2021 and 2022) are approximately 29% lower than the calculated Average Annual Lake Outflow. For comparison, the average observed conditions are more similar to the calculated 10-year Dry Condition (14% higher).</p> <p>In contrast, the Peak Daily Lake Outflow observed conditions are 4% higher than the calculated values.</p> <p>While it is recognized that the observed values are representative of seasonal variation in a natural system, the data indicate that the calculated Average Flow Conditions underestimate the observed values, potentially resulting in an under estimation of the downstream flow reduction from withdrawals.</p>
Recommendation/ Request	Given the results described above, consideration should be given to reassessing the Lake Outflow calculations to better fit with observed data.
Importance	Moderate

1.21 KIA-NIRB-21

Review Comment Number	KIA-NIRB-21
Subject/Topic	Goose & MLA Project Sites – 2023 Annual Geotechnical Inspection (Overburden Stockpile)
References	<p>Paragraph 5.2.3 – Overburden Stockpile (Page 13)</p> <p>The ponding water was observed in areas at the toe of the stockpiles. This is likely in part from the release of water from the overburden soil due with the high ice and water content as the outside layers of the stockpile thaw in the warmer months. The quality of this water is unknown and may present an environmental risk.</p> <p><i>Note: SRK was informed that site has an overburden stockpile monitoring program and corresponding that is in place and should address this comment. This overburden monitoring program was not reviewed as part of the 2023 AGI.</i></p>
Summary	Ponded water with unknown water quality was observed at the toe of the overburden stockpile during the 2023 SRK Geotechnical Inspection.
Detailed Review	Sampling of the ponded water from the toe of the overburden



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Comment	stockpile should be completed for TSS, ammonia, metals, salinity, etc., as part of the regular water quality monitoring program. Based on the water sampling results mitigation such as a diversion channel, berms or silt fencing could be considered to prevent the mixing of runoff water with contact water, especially during spring thaw and summer months when the surficial layer above the permafrost is active.
Recommendation/ Request	Water quality samples should be collected. The water quality, final discharge location of the contact water from the overburden stockpile, and any mitigation measures recommended should be included in the annual report.
Importance	Moderate

1.22 KIA-NIRB-22

Review Comment Number	KIA-NIRB-22
Subject/Topic	Goose & MLA Project Sites – 2023 Annual Geotechnical Inspection (Goose Tank)
References	Paragraph 5.2.4 – Goose Tank Farm (Page 23) The base of the containment area had some water over the base in areas during the inspection. This likely was due to some of the recent rainfall on site around the time of the inspection. Active pumping was not noted at the time of the inspection. The SRK report noted the following: <i>“Site staff indicated that each spring water from both sides of the containment area are managed / pumped. Around the time of the 2024 freshet, additional pumping and water management would be expected to be required. It is SRK’s understanding that this is on sites radar and plans have already been made for this ongoing operational and maintenance support.”</i>
Summary	Ponded water was observed in the containment area during the 2023 SRK Geotechnical Inspection.
Detailed Review Comment	Sampling of the water within the containment area is required before discharging, and the water quality results should be included in the report, as well as the quantity pumped and the final discharge location.
Recommendation/ Request	The water quality and quantity, as well as final discharge location, should be included in the annual report.
Importance	Moderate



Review Comment Number	KIA-NIRB-23
Subject/Topic	Terrestrial Environment / Permafrost Monitoring
References	Project Certificate Condition No. 11
Summary	No information provided on permafrost mapping.
Detailed Review Comment	<p>PCC No. 11 states that <i>“The Proponent shall conduct further permafrost mapping to document permafrost temperature, thickness of seasonal thaw and amount of ground ice in the project development area.”</i></p> <p>B2Gold Nunavut does provide information on the thermal conditions in the document “Back River Project: Site-wide Ground Thermal Monitoring Plan”, prepared by SRK Consulting and dated April 2024, but no information is provided on the amount of ground ice.</p>
Recommendation/ Request	It is requested that B2Gold Nunavut provide information or a qualitative discussion on the amount of ground ice in the project development area based on the information available.
Importance	Moderate

Review Comment Number	KIA-NIRB-24
Subject/Topic	Terrestrial Environment / Permafrost Monitoring
References	Project Certificate Condition No. 11
Summary	Completing correlation between sites.
Detailed Review Comment	B2Gold Nunavut provides multiple ground temperature data time series in the document “Back River Project: Site-wide Ground Thermal Monitoring Plan”, prepared by SRK Consulting and dated April 2024. 42 thermistor locations, classified as background information, have been inactive for many years and no new data is available. Currently, only 9 locations, which were installed in 2023 are active. Four thermistor strings have been used in 2024 for temporary ground temperature measurements. The data and time series provided make it challenging to correlate historic data with current measurements and trends as the locations are different.
Recommendation/Request	It is requested that B2Gold Nunavut provide correlations between the historic / inactive locations and the currently active ones. This could be achieved, for example, by measuring ground



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	temperatures at some of the inactive locations for a short period to generate data overlaps.
Importance	Low

Socio-Economic Monitoring Report

1.25 KIA-NIRB-25

Review Comment Number	KIA-NIRB-25
Subject/Topic	Employment
References	Page iv
Summary	Top reasons for Inuit employee turnover in 2023 were end of contract/retirement, violations of company policy and resignations.
Detailed Review Comment	Are B2 Gold Inuit employees made aware of company policies before they begin their position even if contracted?
Recommendation/Request	Please provide information on training employees about company policies.
Importance	Moderate

1.26 KIA-NIRB-26

Review Comment Number	KIA-NIRB-26
Subject/Topic	Employment
References	Page iv, page 32
Summary	Top reasons for Inuit employee turnover in 2023 were end of contract/retirement, violations of company policy and resignations. Inuit turnover rate of 32%. This is higher than the turnover rate for non-Inuit of 18% during the same period.
Detailed Review Comment	Is there an exit interview for those who have left? What is learned about why resignations occur from the exit interviews? If so, how is the information from exit interviews used to improve Inuit retention?
Recommendation/Request	Please provide more information about why Inuit employees resign, and a plan to use this information to improve Inuit retention. If unknown, please develop a plan for exit interviews and use of that information for improvement.



1.27 KIA-NIRB-27

1.28 KIA-NIRB-28

Page | 26



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1.29 KIA-NIRB-29

Review Comment Number	KIA-NIRB-29
Subject/Topic	Employment - women
References	Table 4.2, page 26
Summary	The statistic that the percentage of hours worked by Inuit women (2%) was lower than non-Inuit women (10%). The statement is made that Indigenous women are less likely to be employed than non-indigenous women in Canada.
Detailed Review Comment	KIA is concerned with the statistics that Inuit women work a lower percentage of hours than non-Inuit women. KIA does not believe that the statement relating to Indigenous women applies to Inuit women.
Recommendation/Request	Please provide a plan for how to increase the percentage of hours worked by Inuit women at the project.
Importance	High

1.30 KIA-NIRB-30

Review Comment Number	KIA-NIRB-30
Subject/Topic	Employment - Construction
References	page 27-28
Summary	Average Inuit construction workforce of 15.8% at the project. This number compares to 20.6 at Meadowbank and 20.2 at Mary River.
Detailed Review Comment	KIA believes that this number can be improved and can reach the higher levels at Meadowbank and Mary River.
Recommendation/Request	Please provide a plan for increasing Inuit workforce during construction.
Importance	High

1.31 KIA-NIRB-31

Review Comment Number	KIA-NIRB-31
Subject/Topic	Employment - Promotions
References	page 34



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Summary	Limited number of Inuit promotions.
Detailed Review Comment	There were 5 Inuit promotions in 2023 at the Project, and 23 non-Inuit promotions
Recommendation/Request	What are these numbers as a percentage of Inuit and non-Inuit employees?
Importance	Moderate

1.32 KIA-NIRB-32

Review Comment Number	KIA-NIRB-32
Subject/Topic	Education and training
References	Page v, page 60
Summary	There were no Inuit apprentices at the project in 2023
Detailed Review Comment	KIA would like to see this increase.
Recommendation/Request	Please provide a plan for increasing Inuit apprentices at the project. What discussions are in place with the Government of Nunavut?
Importance	High

1.33 KIA-NIRB-33

Review Comment Number	KIA-NIRB-33
Subject/Topic	Education and training
References	Page 58
Summary	The statement is made the B2 Gold is committed to developing Inuit specific training programs.
Detailed Review Comment	KIA would like to have more information about these programs – what are they, what is the subject matter, was it determined based on consultation with KIA or other Inuit?
Recommendation/Request	Please provide the additional information requested above.
Importance	Moderate



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1.34 KIA-NIRB-34

Review Comment Number	KIA-NIRB-34
Subject/Topic	Education and training
References	Page 65, 66
Summary	There was only 1 individual supported by B2 Gold's Kitikmeot Junior High and High School Achievement Awards Program in 2023. B2 Gold has a Kitikmeot Junior High and High School Achievement Awards Program that supports resident Kitikmeot Inuit.
Detailed Review Comment	KIA would like the Kitikmeot Junior High and High School Achievement Awards Program to also support urban Kitikmeot Inuit.
Recommendation/Request	Please provide more information about whether the Kitikmeot Junior High and High School Achievement Awards Program supports urban Kitikmeot. If not, please provide an explanation as to why.
Importance	High

1.35 KIA-NIRB-35

Review Comment Number	KIA-NIRB-35
Subject/Topic	Education and training
References	Page 70
Summary	B2Gold is committed to offering second language training courses based on demand. B2 Gold Nunavut has not seen a demand for these courses, and they have not been requested.
Detailed Review Comment	KIA is interested in how these courses are communicated. Do employees know that they are available? Are they publicized?
Recommendation/Request	Please provide the additional information requested above.
Importance	High

1.36 KIA-NIRB-36

Review Comment Number	KIA-NIRB-36
Subject/Topic	Health and community wellbeing - grievances



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References	Page v, page 84
Summary	Two grievances were filed and resolved at the Project in 2023 In 2023, the Supervisor, Community Relations made a total of 4 trips to Project sites.
Detailed Review Comment	KIA has received a number of complaints and concerns from Inuit Back River employees. It may help address these if the Supervisor Community relations were on site more often.
Recommendation/Request	Please provide information about the nature of these grievances. Consider more frequent trips by the Supervisor, Community Relations to the project site.
Importance	High

1.37 KIA-NIRB-37

Review Comment Number	KIA-NIRB-37
Subject/Topic	Health and community well being
References	Page 90
Summary	B2 Gold has developed cross cultural training with KIA, and it is offered at the Project.
Detailed Review Comment	Is cross cultural training provided to contractors as well as employees.
Recommendation/Request	KIA believes it is important to provide cross cultural training to both employees and contractors.
Importance	Moderate

1.38 KIA-NIRB-38

Review Comment Number	KIA-NIRB-38
Subject/Topic	Kitikmeot Qualified Business Registry (KQBR)
References	Page 45
Summary	The statement is made that 28 KQBs were registered representing 120 total goods/services categories.
Detailed Review Comment	This is misleading as there are 15 goods/services categories on the KQBR.
Recommendation/	Please correct or explain this reference.



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Request	
Importance	Low

1.39 KIA-NIRB-39

Review Comment Number	KIA-NIRB-39
Subject/Topic	Non-Traditional land and resource use
References	Page 92
Summary	Comments made on Non-traditional land use.
Detailed Review Comment	Comments were made by the Bathurst Inlet Lodge about the Non-traditional land and resource use VSEC.
Recommendation/Request	KIA seeks more information about these comments by Bathurst Inlet Lodge.
Importance	Moderate

Thank you.

John Roesch, P.Eng.

Senior Hope Bay Project Officer
Kitikmeot Inuit Association, Department of Lands and Environment

Cc Wynter Kuliktana, Director, KIA, Department of Lands and Environment