



July 25, 2024

Attn: Keith Morrison
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU
X0B 0C0

Re: B2Gold Nunavut's Energy Centre Project's *draft* Project Certificate Workshop – Clarification Comments

Dear Keith,

On July 19, 2024, B2Gold Back River Corp. (B2Gold Nunavut) submitted an emailed correspondence to the NIRB noting interest in submitting written clarification comments should the NIRB proceed without a teleconference.

B2Gold Nunavut has enclosed 9 sets of clarification comments for the NIRB's review. Should you have any questions regarding the above, please contact the undersigned at kbenoit@b2gold.com.

Sincerely,

Kristina Benoit
Manager, Environmental Permitting
B2Gold Nunavut

Enclosure: Clarification Comments

Cc: Merle Keefe, B2Gold Nunavut
Andrew Moore, B2Gold Nunavut



B2Gold Nunavut-01	
Project Certificate Section	General - Many new or revised T&Cs now include the following (or similar) text in the reporting requirements
<i>Current Wording</i>	<p>"Information regarding how Inuit Qaujimajatuqangit, Indigenous and Community Knowledge and changes suggested by the Inuit Environmental Advisory Committee and the Caribou Technical Advisory Group have been incorporated into the WMMPP should be discussed in the Proponent's annual report. The Proponent should also include a discussion of how local Hunters and Trappers Organizations and potentially affected communities have been engaged and consulted in relation to relevant components of the WMMPP."</p>
B2Gold Nunavut Clarification Comment(s)	<ol style="list-style-type: none"> 1. B2Gold Nunavut is aware of the ongoing progress being made to revise the IS Guidelines and Proponent tool kits but is not aware of existing definitions for these terms currently in use by the Board. Will NIRB provide definitions for "Indigenous and Community Knowledge"? 2. B2Gold Nunavut integrates community perspectives and TK into its wildlife and socio-economic monitoring programs. For example, B2Gold Nunavut have previously provided NIRB with a document 'Guidance for Incorporating Community Perspectives and Traditional Knowledge in the Back River Project's Monitoring Programs' (see Appendix C of the 2023 Socio-Economic Monitoring Report), and this guidance is already being followed for the annual wildlife and socio-economic monitoring reports. This is done to address existing Term and Condition No. 78. Does the addition of these new reporting requirements suggest B2Gold Nunavut's existing process and methods are no longer suitable? Or that B2Gold Nunavut should simply continue to apply them throughout our monitoring program? 3. Is it NIRB's expectation that B2Gold Nunavut report on engagement related to this T&C only if changes to the WMMPP are made? Or is it expected that we conduct engagement on this specific topic annually? 4. This reporting requirement is listed for the WMMP Plan (TC 37) and then again 12 times for TCs 38, 39, 41, 42, 43, 44, 45, 47, 48, 50, 51 and 52 and 49 (annual report). Shouldn't this apply only to TC 49, the annual report? Is B2Gold Nunavut to report on each of these TCs separately? Can a clarification statement on 78 to say that this can be done once in the WMMP Report?



B2Gold Nunavut-02	
Project Certificate Section	Conditions 10, 34, 37, 39, and 53
Current Wording	“Within 60 days of the issuance of Project Certificate 007, Amendment No. 1 to reflect the addition of the Energy Centre Proposal, the Proponent shall submit an updated version of the Wildlife Mitigation and Monitoring Program Plan (WMMPP) to the Nunavut Impact Review Board (NIRB).”
B2Gold Nunavut Clarification Comment(s)	1. Would it be possible to be consistent with timelines and have all updates required within 90 instead of 60 days.

B2Gold Nunavut-03	
Project Certificate Section	Condition 53 Birds and Bird Habitat – Mitigation, Monitoring, and Adaptive Management for Birds and Bird Habitat
Current Wording	“Conducting a bird mortality survey annually for five (5) years once the turbines are operational to confirm predictions. If predictions are confirmed, then the survey can be completed every three (3) years to ensure that predictions remain consistent.”
B2Gold Nunavut Clarification Comment(s)	1. Why does the NIRB require mortality surveys for 5 years and then every 3 years for the life of the project? This exceeds ECCC guidance of completing the surveys for 2 years and then stopping.



B2Gold Nunavut-04	
Project Certificate Section	Condition 78 Traditional Activity and Knowledge – Incorporation of IQ and TK
Current Wording	<p>“To the extent the sharing of such information is consistent with, and not limited by, any confidentiality or other agreements with the Kitikmeot Inuit Association, summaries addressing the Proponent’s fulfillment of this Term and Condition should be included in the annual Back River socio-economic monitoring reports submitted to the Nunavut Impact Review Board.</p> <p>Information regarding how Inuit Qaujimajatuqangit and Indigenous and Community Knowledge, discussions of how local Hunters and Trappers Organizations and potentially affected communities have been engaged and consulted should also be included.”</p>
B2Gold Nunavut Clarification Comment(s)	<ol style="list-style-type: none"> 1. There are discrepancies that now occur in revised Term and Condition No. 78 with the addition of the revised ‘Reporting Requirements’ text. For one, the new ‘Reporting Requirements’ text seems to require many of the same things the ‘Term and Condition’ text already does, but in unique wording that may be interpreted differently. Several new terms are also introduced in the ‘Reporting Requirements’ text (e.g. Inuit Qaujimajatuqangit and Indigenous and Community Knowledge) that do not also appear in the ‘Term and Condition’ text. To address these inconsistencies B2Gold Nunavut suggests removing the revised ‘Reporting Requirements’ text altogether.

B2Gold Nunavut-05	
Project Certificate Section	Condition 79 Traditional Activity and Knowledge – Inuit Environmental Advisory Committee
Current Wording	<p>“Information regarding the Proponent’s efforts in fulfillment of this Term and Condition shall be included in the Proponent’s annual report to the Nunavut Impact Review Board.</p> <p>Information regarding how Inuit Qaujimajatuqangit and Indigenous and Community Knowledge, discussions of how local Hunters and Trappers Organizations and potentially affected communities have been engaged and consulted should also be included.”</p>
B2Gold Nunavut Clarification Comment(s)	<ol style="list-style-type: none"> 1. The new ‘Reporting Requirements’ for Term and Condition No. 79 regarding “discussions of how local Hunters and Trappers Organizations and potentially affected communities have been engaged and consulted” are irrelevant to the topic of the IEAC and should be removed.



B2Gold Nunavut-06	
Project Certificate Section	Condition 89 Accidents and Malfunctions - Spills
Current Wording	Use of Sabina
B2Gold Nunavut Clarification Comment(s)	1. Please update wording with use of either B2Gold Nunavut or the Proponent

B2Gold Nunavut-07	
Project Certificate Section	Condition 96 Traditional Land Use – Wildlife Harvesting
Current Wording	“The Proponent shall conduct a five (5) year harvest study in nearby communities”
B2Gold Nunavut Clarification Comment(s)	1. B2Gold Nunavut interprets “nearby” as Cambridge Bay, Kugluktuk, Bay Chimo and Bathurst Inlet. Previous Traditional Knowledge (TK) and land use research conducted for the Project, in addition to ongoing community engagement on this topic, have indicated that residents of these locations are the primary users of the areas surrounding the Project and have the greatest likelihood of harvesting wildlife there. Can NIRB confirm this understanding?



B2Gold Nunavut-08	
Project Certificate Section	Condition 96 Traditional Land Use – Wildlife Harvesting
Current Wording	“If there are any changes to wildlife harvesting patterns or wildlife health, the Proponent shall continue the survey with more targeted surveys as suggested by relevant advisory groups...”
B2Gold Nunavut Clarification Comment(s)	<ol style="list-style-type: none"> Should advisory groups suggest “no further surveys” are needed after 5 years is B2Gold Nunavut still expected to conduct additional surveys? Regarding the use of the text “If there are any changes...” <ol style="list-style-type: none"> ‘Any’ can be interpreted in this context as any change, no matter how small and/or what its cause. If over the course of the study the total number of a specific harvested species decreases by only 1% (as a theoretical example), does that constitute a need for additional surveys, if recommended by advisory groups? What if a change is clearly attributable to non-Project factors? It may be more appropriate to use the following text instead: “If significant changes to wildlife harvesting or health are documented during the Study that are clearly attributable to the Project, B2Gold Nunavut may continue the Study beyond its initial 5-year period. The methods and duration of any future Study (e.g. more targeted surveys over a limited time period) would be developed in consultation with relevant advisory groups.” If a change is observed, but advisory groups indicate for any reason that “no further surveys” are required, what is the expectation of B2Gold Nunavut?

B2Gold Nunavut-09	
Project Certificate Section	Appendix A
Current Wording	Not Applicable.
B2Gold Nunavut Clarification Comment(s)	<ol style="list-style-type: none"> Appendix A of the Project Certificate has never been finalized by NIRB. Can NIRB provide an estimated timeline and plan for completing Appendix A?