



Report Title: The Nunavut Impact Review Board's 2023-2024 Annual Monitoring Report for the Back River Project (NIRB File No. 12MN036)

Project: Back River Project

Project Location: Kitikmeot Region, Nunavut

Project Owner: B2Gold Back River Corp. (B2Gold Nunavut)

Proponent Contact: Merle Keefe

Telephone: (604) 998-4175

Address: 666 Burrard St, Suite 3400
Vancouver, BC V6C 2X8

Monitoring Period: October 2023 – September 2024

Date Issued: February 10, 2025

Cover Photo: Goose Lake Property

Table of Contents

1. Introduction	1
2. Project Overview	2
2.1 Project Components	2
2.2 Project History	4
3. Monitoring Activities	6
3.1 Proponent's Responses to the Board's 2022-2023 Recommendations	6
3.2 General Reporting Requirements	6
3.3 Monitoring by Regulatory Authorities	7
3.3.1 Compliance Monitoring	8
3.3.2 Effects Monitoring	10
3.4 NIRB Monitoring	23
3.4.1 Compliance with the NIRB Project Certificate	23
3.4.2 NIRB's Site Visit and Public Information Session	23
4. Findings and Recommendations.....	24
4.1 Monitoring Officer Findings	24
4.2 Board Recommendations	25
5. Conclusion.....	25
APPENDIX A: COMPLIANCE WITH TERMS AND CONDITIONS AND COMMITMENTS OF PROJECT CERTIFICATE 007	27

List of Figures

Figure 2-1 Back River Gold Mine Project Location	3
--	---

List of Tables

Table 2-1: Back River Gold Mine Project History	4
Table 3-1: Updated Plans Within the Proponent's 2023 Annual Report	7
Table 3-2: Updated Plans to Comply with the Project Certificate No. 007, Amendment No. 01...7	7
Table 3-3: Comment Submissions.....	8
Table 3-4: Kitikmeot Inuit Association's Comments and B2Gold's Response for the 2023 Annual Report for the Back River Gold Mine Project.	10
Table 3-5: Government of Nunavut's Comments and B2Gold's Response for the 2023 Annual Report for the Back River Gold Mine Project.	17
Table 3-6: Crown-Indigenous Relations and Northern Affairs Canada's Comments and B2Gold's Response for the 2023 Annual Report of the Back River Gold Mine Project.....	18
Table 3-7: Environment and Climate Change Canada's Comments and B2Gold's Response for the 2023 Annual Report for the Back River Gold Mine Project.....	19
Table 3-8: Fisheries and Oceans Canada's Comments and B2Gold's Response for the 2023 Annual Report for the Back River Gold Mine Project.....	21
Table 3-9: Transport Canada's Comments and B2Gold's Response for the 2023 Annual Report for the Back River Gold Mine Project.....	22

List of Acronyms

CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
CTAG	Caribou Technical Advisory Group
DFO	Fisheries and Oceans Canada
ECCC	Environment and Climate Change Canada
GN	Government of Nunavut
HC	Health Canada
IEAC	Inuit Environmental Advisory Committee
IIBA	Inuit Impact and Benefits Agreement
KIA	Kitikmeot Inuit Association
NIRB	Nunavut Impact Review Board
NWB	Nunavut Water Board
MLA	Marine Laydown Area
TC	Transport Canada
WIR	Winter Ice Road
WMMP	Wildlife Mitigation and Monitoring Plan

1. Introduction

The Nunavut Impact Review Board (NIRB or Board) was established through Articles 10 and 12 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and is responsible for the assessment of ecosystemic and socio-economic impacts of projects in the Nunavut Settlement Area according to the *Nunavut Agreement*. The NIRB is responsible for post-environmental assessment monitoring of projects in accordance with Part 7 of Article 12 of the *Nunavut Agreement* and s. 135 of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*).

The purpose of the NIRB's monitoring program as outlined in Section 12.7.2 of the *Nunavut Agreement* and s. 135(3) of the *NuPPAA* are:

- a) measure the impact of the project on the ecosystemic and socio-economic environments of the designated area;
- b) determine whether the project is carried out in accordance with the terms and conditions imposed under subsection 152(6) or set out in the original or amended project certificate;
- c) provide the information necessary for regulatory authorities to enforce the terms and conditions of licences, permits or other authorizations that they issue in relation to the project; and
- d) assess the accuracy of the predictions contained in the project impact statement.

This report provides findings that resulted from the Board's monitoring program for B2Gold Back River Corp.'s (B2Gold Nunavut) Back River Project (Back River or the Project) from October 1, 2023 to September 30, 2024. The general observations were made to the requirements of Project Certificate No. 007 (2017) as Project Certificate No. 007, Amendment 01 was issued on August 7, 2024 towards the end of the NIRB's monitoring period.

2. Project Overview

2.1 Project Components

The Back River Project (NIRB File No. 12MN036) consists of the proposed mobilization, construction, operation, closure, reclamation, and post-closure monitoring of a gold mine in the Kitikmeot region of Nunavut. The Project is located approximately 400 kilometres (km) southwest of the community of Cambridge Bay, 400 km southeast of Kugluktuk, and 520 km northeast of Yellowknife, Northwest Territories (Figure 2 -1).

The Project includes the Goose Property and the Marine Laydown Area (MLA) located at Bathurst Inlet, with a Winter Ice Road (WIR) connecting these two (2) main developments.

Once constructed, the Goose Property will consist of a processing plant; four (4) deposits (Umwelt, Llama, Echo, and Goose Main) to be mined through open and underground mining methods; an all-weather air strip; a camp facility; and associated mining facilities. Ore mined at the Goose Property will be hauled to ore stockpiles located at the Goose Property where the ore will be processed within an ore processing plant (mill) using conventional gravity concentration and cyanidation techniques at approximately 6,000 tonnes of ore per day. A tailings storage facility will be built southeast of the Goose Main open pit for tailings deposition during the first two (2) years of production, with tailings then to be directly deposited into the mined-out Umwelt open pit and then into the mined-out Goose Main open pit for the remaining mine life. The gold bars produced will be transported off-site by aircraft.

The MLA is located approximately 130 km northwest of the Goose Property and is the primary staging area for equipment, material, fuel, and other supplies required for the construction and operation of the Project. The MLA will consist of a single barge terminal, laydown areas, a camp facility, and associated storage and maintenance facilities. Once constructed the Project will be resupplied annually from southern Canada by barge during the open water season. Project materials will then be transported from the MLA to the Goose Property using a winter ice road from mid-January to April.

The George Property is an advanced exploration camp located approximately 50 km northwest of the Goose Property and B2Gold may construct an annual spur road from the winter ice road to the George Property for transportation of supplies. The continuation of a diamond drilling-based mineral exploration program for the George Property and the Wishbone claim of mineral leases was included within the scope of the Board's assessment for the Back River Gold Mine Project. It should be noted that further advanced exploration (i.e., bulk sampling and infrastructure development) was not included in the Project scope, with the understanding that such activities would require further assessment by the NIRB before occurring.

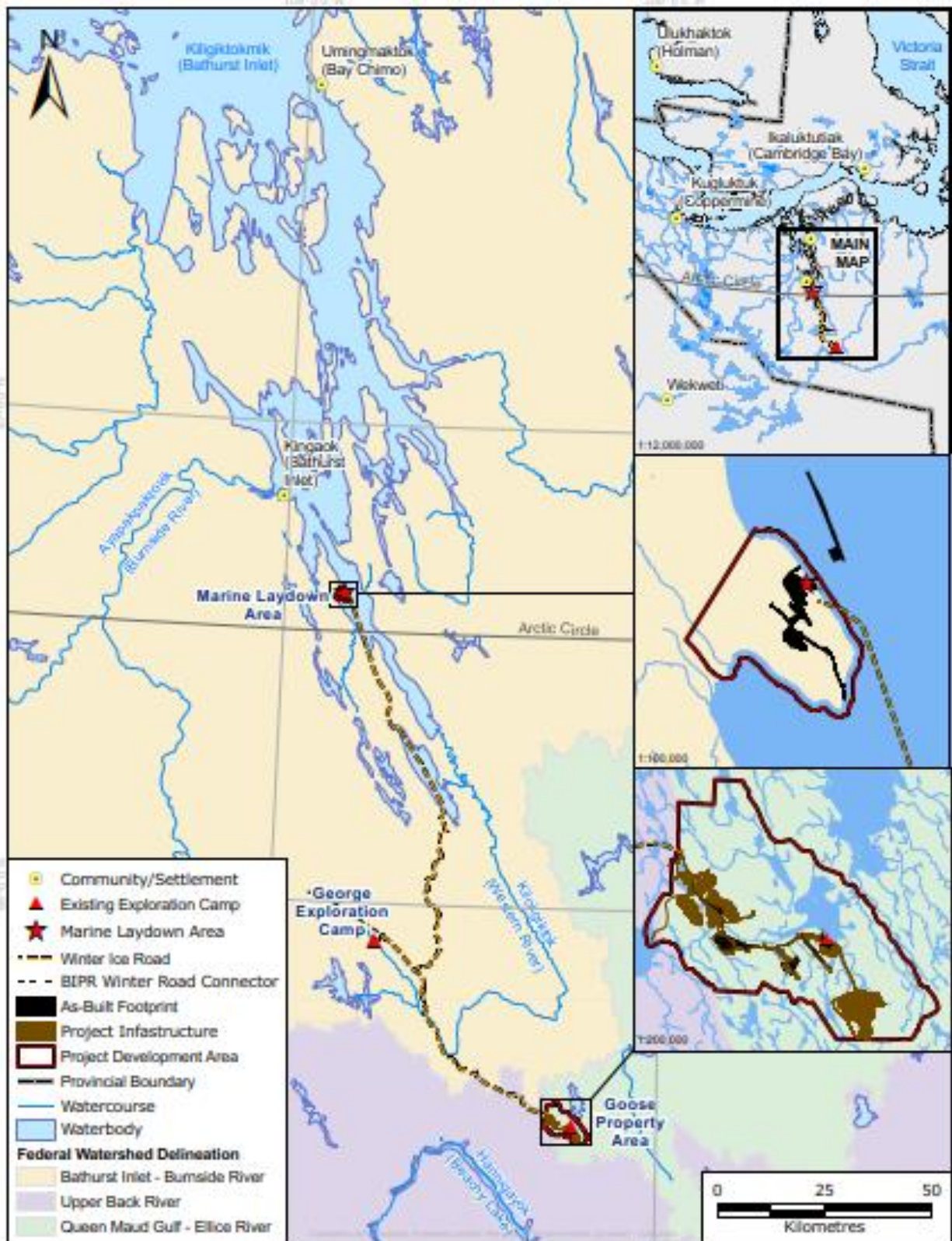


Figure 2-1 Back River Project Location

2.2 Project History

A brief history of the Back River Project beginning with the original Project application and including recent modifications and amendments is provided in Table 2-1.

2020 Modification Package

In 2020, Sabina Gold and Silver Corporation (Sabina) applied to the NIRB with the “2020 Modification Package” which included widening and extension of the airstrips, additional water use, a change in mine plans, adjustment of the Winter Ice Road, the construction of a sealift unloading pad, and other changes which the NIRB determined did not require an amendment to the Project Certificate but stated that updates to management and mitigation plans and modifications to the existing monitoring program were required.

Back River Project Energy Centre

In August 2022, NIRB received a referral from the Nunavut Planning Commission for the new proposal of B2Gold Nunavut’s “Back River Project Energy Centre” (Energy Centre). This proposal consisted of the addition of 13 wind turbines, a solar panel array, a Battery Energy Storage System and transmission line at the Goose Property. The NIRB undertook a thorough assessment of the Proposal and reconsideration of the Project Certificate No. 007 beginning in March 2023. The Board concluded in April 2024 that the Back River Project Energy Centre should be allowed to proceed, and Project Certificate Amendment No. 01 was issued August 7, 2024.

Documentation associated with the Back River Project and the Back River Project Energy Centre is available online from the NIRB’s Public Registry at www.nirb.ca/project/124149 and www.nirb.ca/project/125740, respectively.

Table 2-1: Back River Gold Mine Project History

Year	Achievement/Comment
December 2017	The NIRB issued Project Certificate No. 007 and Sabina applied for authorizations to commence construction of the mine.
April 2018	Sabina and the Kitikmeot Inuit Association entered into a land tenure and Inuit Impact Benefit Agreement.
April 2018	Pre-development commenced at the Marine Laydown Area (MLA) including the construction of a 40-person camp, earthworks, airstrip, and laydown storage areas. At Goose site, commencement of earthworks; including quarry expansion, heavy equipment upgrades and initial road and bridge construction.
November 2019	Sabina received its Type “A” Water License (2AM-BRP1831) which allows for the construction and operation of the mine activities.
June 2020	Sabina submitted the Back River Project “2020 Modification Package” to the NIRB after the determination by the Nunavut Planning Commission that the proposal was outside the area of an applicable regional land use plan and a significant modification to the Project.
August 2020	NIRB determined that the “2020 Modification Package” did not require further assessment.
Summer 2021	Work was carried out on expanding the airstrip, site roads, laydown area, and exploratory and geotechnical drilling.

Year	Achievement/Comment
	Amendment of Type “A” licence 2AM-BRP1831
September 2022	Sabina officially announces that the Project is entering in construction.
January 2023	NIRB initiates formal reconsideration of the Project Certificate regarding the “Back River Project Energy Centre” project proposal.
April 2023	B2Gold completes the acquisition of Sabina Gold and Silver Corporation, proceeding with the Back River Project under the name of B2Gold Nunavut
April 2024	NIRB determined the Back River Project Energy Centre proposal should be allowed to proceed.
August 2024	NIRB issues Project Certificate Amendment No 1.

3. Monitoring Activities

3.1 Proponent's Responses to the Board's 2022-2023 Recommendations

The NIRB issued its 2022-2023 Monitoring Report for the Back River Project on December 11, 2023¹. Regarding Term and Condition No. 51 of the Project Certificate which requires the Proponent to develop and participate in a Caribou Technical Advisory Group (CTAG), the Monitoring Report notes:

The Board has not received any reports, information, or any recommendation from the Caribou Technical Advisory Group to date. The information provided in the 2022 Annual Report is limited and it is difficult to understand what, if any, advice or decisions were made at the meetings were given to Sabina and if that advice was applied or not.

It is important that a summary of key issues or items discussed during those meetings and how they were resolved, or are being discussed further for resolution, could increase understanding of the management of caribou around the Back River Gold Mine Project. Further, considering the overall concern on caribou from community members during the Community Roundtable of the Back River Gold Mine Project Energy Centre Proposal, reporting about the Caribou Technical Advisory Group seems essential to respond to concerns as well as future discussions regarding the Back River Gold Mine Project. The Board has recommended that B2Gold report on the key points and/or advice discussed by the Caribou Technical Advisory Group, and if advice was not incorporated the rational for not incorporating it within 45 days.

B2Gold Nunavut provided a response to the Board on February 15, 2024, listing the key issues identified during the 2022-2023 CTAG meetings, along with B2Gold Nunavut's commitments.² The key issues identified were caribou behaviour monitoring (including along the Winter Ice Road) and updates to the Wildlife Mitigation and Monitoring Plan (WMMP) specific to the Energy Centre proposal. B2Gold Nunavut provided some details related to caribou monitoring and committed to sharing additional details in their next Annual Report. They also committed to provide mitigation and monitoring specific to the Energy Centre in the WMMP.

It should be noted that identification of mitigation and monitoring programs for the Energy Centre, updates to the WMMP, and the CTAG were central themes of the Board's assessment of the Energy Centre throughout 2023 and early 2024, and the Project Certificate No. 007, Amendment No.01 introduced specific language on these matters.

3.2 General Reporting Requirements

B2Gold Nunavut provided the 2023 Annual Report for the Back River Project (2023 Annual Report) to the NIRB on April 15, 2024³. The 2023 Annual Report summarizes the Project activities and stakeholder consultation undertaken in 2023, monitoring results, a summary of

¹ NIRB Doc ID: 347673

² NIRB Doc ID: 348359

³ NIRB Doc ID: 349951

reportable spills, and the Proponent's self-assessment of compliance with the Project Certificate. The *2023 Annual Report* also includes the updated management plans listed in Table 3-1:

Table 3-1: Updated Plans Within the Proponent's 2023 Annual Report

Plan	Version	NIRB Doc ID.
Ground Thermal Monitoring Plan	April 2024	349359
Socio-economic Monitoring Plan	March 2024	349367
Community Engagement Plan	March 2024	349368
Inuit Business Development Plan	March 2024	349369

During the NIRB's assessment of the Back River Project Energy Centre proposal, the Proponent committed to updating various management and monitoring plans to specifically account for the Energy Centre. With the issuance of Project Certificate 007 Amendment No. 01 (Table 3-2), B2Gold Nunavut was required to submit these updated plans within 60 days of the Project Certificate Issuance.

Table 3-2: Updated Plans to Comply with the Project Certificate No. 007, Amendment No. 01.

Plan	Version	NIRB Doc ID.
Noise Abatement Plan	TBD	TBD
Vegetation Monitoring Plan	TBD	TBD
Wildlife Mitigation and Monitoring Plan	V13, October 2024	351932, 351933

3.3 Monitoring by Regulatory Authorities

On May 13, 2024, the NIRB requested that Regulatory Authorities with jurisdiction and/or area of expertise for the Back River Project review the Proponent's *2023 Annual Report* and provide comments with respect to the following:

Compliance Monitoring:

- Identify the terms and conditions from the Project Certificate which have been incorporated into any permits, certificates, licences, or other approvals issued for the Project, where applicable and report annually to the NIRB on the status of those incorporated terms and conditions;
- A summary of any inspections conducted during the 2023 reporting period, and the results of these inspections; and
- A summary of the Proponent's compliance status regarding authorizations that have been issued for the Project.

Effects Monitoring:

- Whether the conclusions reached by B2Gold Nunavut in the *2023 Annual Report* are valid; and
- Any areas of significance requiring further supporting information or any changes to the monitoring program which may be required.

A list of comment submissions received by the NIRB on or before July 4, 2024, is shown in Table 3-3. The comments are summarized below along with B2Gold's responses.

Table 3-3: Comment Submissions

Submission	NIRB Doc ID.
Kitikmeot Inuit Association (KIA)	350651
Government of Nunavut (GN)	350664
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)	350630
Environment and Climate Change Canada (ECCC)	350641
Fisheries and Oceans Canada (DFO)	350650
Health Canada (HC)	350631
Transport Canada (TC)	350631

3.3.1 *Compliance Monitoring*

3.3.1.1 *Kitikmeot Inuit Association*

The Back River Project Inuit Impact and Benefits Agreement (IIBA) was entered into in 2018 between Sabina Gold & Silver Corporation and the Kitikmeot Inuit Association (KIA) and addresses socio-economic interests of Inuit in the region, including employment, contracting, and training. Under the IIBA, the Proponent has a commitment to report on socio-economic and ecosystemic effects of the Project in the Kitikmeot Region. B2Gold Nunavut is to provide information on the socio-economic effects through the IIBA Implementation Committee, the B2Gold Nunavut Liaison and the IIBA Manager; and on ecosystemic effects through the Inuit Environmental Advisory Committee (IEAC). The KIA has confirmed that the Proponent has participated in various meetings of the Implementation Committee since it formed in December 2022 and that the IEAC was formally established in July 2023.

The Framework Agreement between the KIA and B2Gold Nunavut covers conditions of land use licencing and reporting. The KIA confirmed that B2Gold Nunavut has provided them 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 *2023 Annual Report* submitted to NIRB.

In 2023, the KIA conducted its site inspection the Back River Project from August 7 to 10, 2023. A total of 86 site components were inspected at the Goose Lake Camp, Marine Laydown Area (MLA) facilities, and George Lake Camp. Overall, the KIA concluded that the Proponent is in compliance with permits, licences and agreements and with the Project Certificate Terms and Conditions. Additional information is found within the KIA's submission to the NIRB.

3.3.1.2 *Government of Nunavut*

The Government of Nunavut (GN) did not conduct any site inspections in 2023 and has not issued any permits or authorizations for this Project.

3.3.1.3 *Crown-Indigenous Relations and Northern Affairs Canada*

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has a mandate for the co-management of water resources and the management of Crown Land in Nunavut under the following applicable acts and regulations:

- The *Department of Crown-Indigenous Relations and Northern Affairs Act*;

- The *Nunavut Land Claims Agreement Act* and the *Nunavut Agreement*;
- The *Arctic Waters Pollution Prevention Act* and Regulations;
- The *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and Regulations; and
- The *Territorial Lands Act* and Regulations.

CIRNAC monitors project activities to ensure compliance with Terms and Conditions in any water licences, land use authorizations such as permits and leases, and the Project Certificate. On July 4, 2024, CIRNAC provided the NIRB with a summary of the site inspections it conducted on March 22, 2023, and September 28, 2023 under the Type A Water Licence 21M-BRP1831. Recurring issues related to the storage of hazardous materials and wastes at the site were noted and several recommendations were made. CIRNAC has noted that it will continue to work with B2Gold to resolve outstanding issues and ensure compliance with all applicable water licence conditions associated with the Back River Project.

3.3.1.4 *Environment and Climate Change Canada*

The Back River Project is subject to the following legislation under Environment and Climate Change Canada (ECCC)'s mandate:

- Subsection 36(3) of the *Fisheries Act*;
- Metal and Diamond Mining Effluent Regulations;
- *Canadian Environmental Protection Act*;
- Environmental Emergency (E2) Regulations; and
- Cross-border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations.

ECCC's submission stated that during its site inspection of the Marine Laydown Area (MLA) in May 2023, the officer was made aware of a culvert issue that may have led to sedimentation. ECCC noted that a 'sedimentation event' could be classified as a 'deleterious deposit' under subsection 36(3) of the *Fisheries Act*, and that these types of events should be reported to the NT-NU 24-Hour Spill Report Line, even if the Proponent is also contacting Fisheries and Oceans Canada (DFO) directly.

3.3.1.5 *Fisheries and Oceans Canada*

In 2019, Fisheries and Oceans Canada (DFO) issued an Authorization under the *Fisheries Act* for the fish-out and dewatering of Llama-Umwelt Lake System (12-HCAA-CA7-00007). DFO has also previously issued the following Letters of Advice:

- 18-HCAA-00185 (Gander Culvert)
- 18-HCAA-00971 (MLA)
- 18-HCAA-01626 (Winter Ice Road)
- 18-HCAA-CA7-00007 (Rascal Stream Diversion)

In August 2023, DFO visited Rascal Stream West (RSW) where culverts were being installed. Construction had commenced in early May 2023 but had to be halted due to an earlier than expected freshet and flooding of the isolated work area. A secondary channel culvert

construction was finalized, and a diversion channel allowed Arctic Grayling to migrate upstream through the secondary channel. Construction resumed in late August/early September once Arctic Grayling had out-migrated and flow levels decreased. DFO is of the opinion that the proponent responded appropriately to the event, and that Arctic Grayling migration was not impeded.

The Llama Lake fish-out was completed over a 9-week period from July 8 to September 6, 2023. DFO was on site assisting from August 9 to 11, 2023. DFO has noted that the fish-out was conducted in accordance with the approved Fish-out Plan. DFO has received the required reporting from the Proponent and concludes that overall the Project is in compliance with the *Fisheries Act* Authorization (12-HCAA-CA7-00007).

3.3.1.6 *Health Canada*

Health Canada has not issued any permits or authorizations for this Project and did not conduct any site inspections in 2023.

3.3.1.7 *Transport Canada*

Transport Canada (TC or Department) did not conduct any site visits or inspections in 2023, nor any monitoring of the Transportation of Dangerous Goods (TDG). However, TC has confirmed that the Project's oil handling facility (OHF) and marine facility are both in compliance with regulatory requirements and no enforcement activity was undertaken by TC in 2023. TC also noted that no complaints or concerns regarding TDG were received by TC in 2023, and the Department did not undertake any enforcement actions for TDG.

Transport Canada has previously issued three (3) permits to the Proponent under *Canadian Navigable Waters Act*:

- 2012-600767-002 (MLA Discharge Pipeline)
- 2012-600767-003 (MLA Intake Pipeline)
- 2012-600767-006 (MLA Lightering Barge)

TC's Navigation Protection Program received no complaints about navigation related to the project in 2023 and no compliance issues were noted. However, TC noted that the authority of these authorizations remains with Sabina Gold & Silver Corp. until B2Gold Nunavut files a Transfer of Ownership.

3.3.2 *Effects Monitoring*

3.3.2.1 *Kitikmeot Inuit Association*

A summary of the comments from the KIA on the Proponent's *2023 Annual Report* and B2Gold Nunavut's responses is provided below in Table 3-4.

Table 3-4: Kitikmeot Inuit Association's Comments and B2Gold's Response for the 2023 Annual Report for the Back River Gold Mine Project.

Comment No.	Comment	B2Gold Nunavut Response
KIA-NIRB-01	Only 10 out of 72 vegetation plots were monitored, with the rest lost due to WIR construction and change in alignment. An	Additional WIR monitoring plots along the WIR will be added in 2025.

Comment No.	Comment	B2Gold Nunavut Response
	updated vegetation monitoring plan should be provided with new paired vegetation monitoring plots and with an explanation of how impacts on vegetation from the Project will be determined.	Going forward, a quantitative disturbance ranking will be added to the photographic monitoring. Data from the original WIR monitoring plots can still be used as comparison to pre-construction conditions of the existing plots, and the paired design means reference plots will not be impacted by future possible WIR disturbances.
KIA-NIRB-02	As two (2) wolverines (Species at Risk) had to be euthanized following attraction to the incinerator, adequate mitigation and adaptive management needs to be discussed and demonstrated.	Additional monitoring and mitigation has been implemented in 2024 to manage wildlife attraction. As part of the upcoming Caribou Technical Advisory Group meeting (CTAG), B2Gold will discuss with the KIA, the past issues with wolverine attraction, the adaptive mitigation measures that have been implemented to date, and further measures that can be applied, as necessary.
KIA-NIRB-03	If owls or other raptors/waterfowl/geese are found dead, send for a necropsy to rule out inhalation and consumptive poisoning and to test for avian diseases.	Going forward, if owls or other raptors/waterfowl/geese are found dead at site they will be offered to interested parties to be sent for necropsy.
KIA-NIRB-04	Include percentages for the overlap of caribou utilization distributions with both the PDA as well as the Zone of Influence for a more meaningful assessment of habitat loss or habitat quality reduction.	The objectives of monitoring seasonal ranges are to identify when caribou interact with the project and to identify if calving grounds have moved, not to calculate habitat loss. However, B2Gold has updated the assessment for 2023 data which results in only a minor change.
KIA-NIRB-05	The Proponent notes it will continue to implement the staged reduction of Project activities to mitigate impacts to caribou during the pre-construction phase. As the Project is now in the construction phase, this should be updated.	This will be updated.
KIA-NIRB-06	Please include information on any progressive reclamation activities initiated or planned in each annual report.	No progressive reclamation has been initiated as there are not yet any areas requiring remediation. The status of progressive reclamation will be communicated in future annual reports.
KIA-NIRB-07	Report on inspections of equipment and bulk samples per the invasive species standard operating procedure.	The standard operating procedure and Verification forms were included in Appendix I of the 2023 Annual Report.
KIA-NIRB-08	The Wildlife Mitigation and Monitoring Program Plan needs to be updated to	A standard operating procedure has been developed that guides wildlife monitoring at

Comment No.	Comment	B2Gold Nunavut Response
	include methods of deterrence, monitoring details, and adaptive mitigation before construction of the water attenuation ponds and the Tailings Impoundment Area.	on-site ponds and the implementation of adaptive mitigation if required.
KIA-NIRB-09	Provide reasoning for replacement of the clear-span bridge with two (2) culverts and provide the amount of fish habitat loss due to the footprint of the culverts.	The clear-span bridge was intended as temporary solution for the all-weather road. It could not accommodate haul truck traffic and therefore was replaced with the twinned culverts (closed bottom) which were embedded within the substrate to minimize the loss of fish habitat.
KIA-NIRB-10	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.	Spring flow measurements collected in 2024, as part of the Rascal Stream West monitoring program, will be reviewed and summarized for submission in the 2024 annual report.
KIA-NIRB-11	Provide the results for the two modelled flow condition scenarios at the Goose Lake Outlet (baseline and Project-related altered flow regime), accounting for changes due to climate change.	B2Gold will continue to collect and evaluate hydrometric monitoring data, and may define a characteristic climate change flow regime at the outlet of Goose Lake at that time.
KIA-NIRB-12	To determine impact of water withdrawals on spawning and the local Arctic Grayling population, provide information on availability of other local spawning areas for this population.	Potential impacts to the regional Population that would occupy habitat over a larger spatial scale would be non-measurable. Other populations in the region would not be impacted by water withdrawal from Goose Lake.
KIA-NIRB-13	Provide summary of 2023 baseline water quality data collected.	The 2023 Surface Water Report is attached to these responses.
KIA-NIRB-14	Provide additional discussion and analysis of the holding time exceedances in the 2021 and 2022 water quality sampling.	Holding times were exceeded for 11 parameters in 2021 and 2022 largely due to logistical constraints (shipping). Mitigation will include improved communication and coordination with couriers and laboratories before and after shipment.
KIA-NIRB-15	Discuss possible causes why total chromium was measured as above the chronic guideline for the protection of aquatic life in one sample collected in August 2022.	The sample may have been contaminated during sampling, sampling processing, transportation, and/or laboratory analysis. All other samples had lower levels of total chromium.
KIA-NIRB-16	Explain gaps / breaks in monitoring coverage of turbidity downstream of culverts installed in Rascal Stream West.	Not all stations were sampled due to changing flow paths:

Comment No.	Comment	B2Gold Nunavut Response
		DS1.1,DS2.3, DS3.3 did not have flow prior to May 16, 2023; DS1.2, DS2.2, DS3.3, did not have flow prior to May 13, 2023; DS1.1, DS2.1, DS3.1 were disconnected after May 16, 2023.
KIA-NIRB-17	Discuss whether baseline FEIS flow data from 1971 to 2011 at Goose Lake outlet is representative of current (background) conditions and useful for analysis of impacts of water withdrawal on Goose Lake hydrology. Also discuss whether flow modelling incorporates climate change.	See the responses to KIA-NIRB-11 and KIA-NIRB-20.
KIA-NIRB-18	Marine water quality sampling included collection of field replicates for QA/QC. Relative Percent Difference (RPD) was calculated to assess precision. Please provide more information on how RPDs >100% were analyzed.	Professional judgement would assess if the replicate or parent sample could be an outlier for reasons such as if the replicate or parent sample had an excessive suspended sediment concentration compared to the other sample which could have been a result of inadvertently touching the bottom during sample collection.
KIA-NIRB-19	Water quality sampling results from 2019-2022 and 2023 should be presented in a table for comparison along with time-dependent hydrographs to allow identification of trends.	The 2023 Surface Water Report is attached to these responses. The 2023 data are meant to serve as additional baseline water quality data to support the hydrodynamic model. The AEMP will be implemented in 2024 and the first AEMP Report will provide time series plots of parameters of interest.
KIA-NIRB-20	Average observed annual outflow at Goose Lake is lower than the calculated average condition, while observed peak daily outflows are higher than the calculated average condition. Consideration should be given to reassessing the Lake outflow calculations.	There is natural variability driven by significantly varying seasonal climate. Hydrometric monitoring data will continue to be collected and B2Gold may redefine characteristic flow regimes based on a longer period of site-specific observed flows.
KIA-NIRB-21	Ponded water was observed at toe of the overburden stockpile. The water quality, final discharge location, and any mitigation measures should be included in the annual report.	Ponding water occurred in small volumes and ultimately evaporated. If ponding water occurs in volumes requiring management, B2Gold Nunavut will complete water quality sampling in advance as suggested.
KIA-NIRB-22	Ponded water was observed in the Goose Tank Farm containment area. Water quality and quantity and final discharge	Ponding water within the Goose Tank Farm will be managed in accordance with Part F, Item 12, of Type A Water License 2AM-

Comment No.	Comment	B2Gold Nunavut Response
	location should be included in the annual report.	BRP1831 (Amendment. No. 1). Results will be provided with the annual report.
KIA-NIRB-23	Provide information on the amount of ground ice in the project development area.	Additional details related to ground ice will be provided in the next revision of the “Sitewide Ground Thermal Monitoring Plan” to be included in the 2024 annual report.
KIA-NIRB-24	Provide correlations between the historic/ inactive thermistor locations and current active ones.	B2Gold Nunavut is actively working to either collect measurements from the historic inactive locations, and/or to install new ground temperature cables that could be used to help link and correlate with some of the historic locations.
KIA-NIRB-25	Provide information on training employees about company policies.	All B2Gold Nunavut employees are made aware of Company policies relevant to their employment at the Project through their employment contracts and a series of orientation sessions. Orientation sessions are typically held on the first day of employment.
KIA-NIRB-26	Provide information about why Inuit employees resign and a plan to use this information to improve Inuit retention. Develop exit interviews if needed. Provide statistics on turnover rate for Inuit women in particular.	Exit interviews are offered to all departing Project employees but typically see very limited uptake as they are voluntary in nature. Top known reasons for Inuit resignations have included family issues at home, being “homesick”, and spousal issues/concerns. B2Gold has factored this into management decision making and is more flexible in site emergency departure requests for Inuit employees. Information on Inuit female employee turnover is provided in Table 4.5 of the 2023 SEMR.
KIA-NIRB-27	Provide a plan to increase the percentage of Inuit in skilled and supervisory positions.	Per the IIBA, Career Development Plans (CDPs) are developed with each interested Inuit employee to help plan career advancement including identifying the necessary skills, experience and training to advance.
KIA-NIRB-28	Provide more discussion related to the 2017 statistic presented of median total income of tax filers in the Kitikmeot Region being \$29,070.	2017 is the most recent year this statistic is available from the Nunavut Bureau of Statistics. This provides baseline information until relevant construction phase data is available.

Comment No.	Comment	B2Gold Nunavut Response
KIA-NIRB-29	Provide a plan for how to increase the percentage of hours worked by Inuit women at the project.	B2Gold has developed / is developing several initiatives in this area, including but not limited to (see B2Gold's full response for additional details): -Ensuring safe and respectful work and living spaces for women on site; -Including Inuit women in development of relevant policies and programs on site; -Development of gender and culturally sensitive life-skills training and counselling programs; -Career development planning, career mentorship program with other women and peer-support initiatives.
KIA-NIRB-30	Provide a plan for increasing Inuit workforce during construction.	Inuit employment has been steadily increased during construction as a result of initiatives such as increased employment outreach in the Kitikmeot, an HR team focused on Inuit recruitment, Career Development Planning, and new well-being programs on site. Additionally, B2Gold has been engaged with the KIA on an Inuit training partnership since 2023.
KIA-NIRB-31	Regarding the number of promotions presented (5 Inuit, 23 non-Inuit), what are these numbers as a percentage of Inuit and non-Inuit employees?	7% of Inuit employees received a promotion in 2023 and 4% of non-Inuit employees received a promotion in 2023.
KIA-NIRB-32	Provide a plan for increasing Inuit apprentices at the project. What discussions are in place with the Government of Nunavut?	Details of B2Gold Nunavut's Inuit Apprenticeship Program will be finalized in the future. It is envisioned to be a workplace-based post-secondary education program initiated by B2Gold in close cooperation with Nunavut Arctic College and the GN. Discussions with the GN are ongoing. B2Gold also expects apprenticeship opportunities will be identified through its recent partnership with the Redfish Arts Society Inc. in Cambridge Bay that will allow students to work alongside the B2Gold maintenance team.
KIA-NIRB-33	Provide more information about Inuit specific training programs that B2Gold would develop. What subject would they	B2Gold has held several conversations with the KIA since 2023 regarding an Inuit training partnership. Both in-house and external training programs will be developed

Comment No.	Comment	B2Gold Nunavut Response
	cover and was that determined based on consultation with the KIA or other Inuit?	/ supported and will include community programing, workforce orientation programs, general workforce training initiatives and technical workforce training initiatives.
KIA-NIRB-34	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.	B2Gold's priority is to increase uptake and knowledge of the existing Kitikmeot Junior High and High School Achievement Awards Program within the Kitikmeot Region.
KIA-NIRB-35	B2Gold Nunavut has committed to offering second language training courses if requested. Do employees know these courses are available? Are they publicized?	Currently second language training opportunities are communicated to employees via ongoing discussions with the Indigenous & Northern Affairs team. Moving forward, this will be communicated to employees via Cultural Awareness Training sessions.
KIA-NIRB-36	Consider more frequent trips by the Supervisor, Community Relations to the project site to address employee complaints and concerns.	The Supervisor, Community Relations will continue to visit the Project and provide support to Inuit employees and contractors. As of 2024, B2Gold also employs a Coordinator, Inuit Support to assist Inuit employees on site (two Kitikmeot Inuit work on site-based cross rotations to fill the role).
KIA-NIRB-37	It is important to provide cross cultural training to both employees and contractors	Cross-Cultural Training is provided to both employees and contractors at the Project. Corporate staff (e.g. in Vancouver and Edmonton) also receive Cross-Cultural Training.
KIA-NIRB-38	The statement is made that 28 Kitikmeot Qualified Businesses were registered representing 120 total goods/services categories. This is misleading as there are 15 goods /services categories on the registry.	B2Gold Nunavut acknowledges there are a total of 15 unique goods /services categories on the registry (in addition to an 'Other' category). B2Gold's calculation added the number of contract categories represented by each Kitikmeot Qualified Business in 2023 together.
KIA-NIRB-39	Provide more information about the comments made by the Bathurst Inlet Lodge about non-traditional land and resource use.	Bathurst Inlet Lodge indicated the Project's effect on the Lodge was limited to the visual impact of the MLA from Fishing Creek. The Lodge also requested logistical support from B2Gold in the form of access to the MLA airstrip, which B2Gold accommodated throughout 2022.

3.3.2.2 Government of Nunavut

A summary of the comments from the GN on the Proponent's 2023 Annual Report and B2Gold Nunavut's responses is provided below in Table 3-5.

Table 3-5: Government of Nunavut's Comments and B2Gold's Response for the 2023 Annual Report for the Back River Gold Mine Project.

Comment No.	Comment/Recommendation	B2Gold Nunavut Response
GN AR #1	Update the <i>Air Quality Monitoring and Management Plan</i> and <i>Fugitive Dust Response Plan</i> to include clear triggers to initiate adaptive management for dust suppression.	An AQMMP update is in progress and the GN's recommendation will be considered. Currently dust suppression is applied once dust clouds start forming, and not at a specific size or dissipation threshold.
GN AR #2	Confirm list of equipment and supplies brought to the Project during the reporting period; Clarify if invasive plant vehicle inspections of equipment and bulk supplies are required or incidental; Provide records indicating the outcome of these inspections.	All items being shipped are required to be screened prior to shipment per the Back River Pre-shipment Equipment Cleaning Requirements standard operating procedure. Also, B2Gold verifies offloaded contents at sign align with the standard operating procedure.
GN AR #3	Although reporting minor spills is not strictly required, the Proponent should endeavor to report all spills.	B2Gold Nunavut thanks the GN for their comment.
GN AR #4	Provide an explanation as to why pilots failed to report any wildlife sightings in 2023; clarify which months helicopters were utilized; clearly depict helicopter flights occurring above or below 610 m above ground; provide tabular data of flight logs.	The helicopter pilot brochure and a standard operating procedure have been updated to provide options to pilots for recording sightings and pilots will be reminded to ensure sightings are recorded when possible. The months helicopters are used will be clarified in future and B2Gold will explore ways to improve helicopter data in future annual reports, including possible inclusion of flight logs.
GN AR #5	Explain why no pre-blast survey for caribou occurred in April 2023 at the Gander Site and why pre-blast survey documentation is missing for ~32% of days where blasting occurred.	The pre-blasting standard operating procedure and associated datasheet were updated and distributed onsite in March 2024 to the blasting foreman and other personnel, and individuals were reminded of the importance of the surveys and documentation.
GN AR #6	Develop / describe programs and strategies to promote recruitment and employment of Inuit especially Inuit women.	See responses to KIA #27, KIA #29, KIA #30, KIA #32, and KIA #33. Additionally, B2Gold hopes to develop an MOU with the GN to enhance efforts to promote employment of Inuit and Inuit women.

3.3.2.3 Crown-Indigenous Relations and Northern Affairs Canada

A summary of the comments from CIRNAC on the Proponent's 2023 Annual Report and B2Gold Nunavut's responses is provided below in Table 3-6.

Table 3-6: Crown-Indigenous Relations and Northern Affairs Canada's Comments and B2Gold's Response for the 2023 Annual Report of the Back River Gold Mine Project.

Comment No.	Comment/Recommendation	B2Gold Nunavut Response
CIRNAC #1	Confirm if background thermal monitoring sites were re-established in 2023 and provide mapping from those sensors; provide background thermal monitoring data and compare to previous results.	No historic Ground Temperature Cables locations were re-established in 2023. Only new monitoring locations were established in 2023. A comparison of recent readings to background readings will be included as part of the 2024 annual reporting.
CIRNAC #2	Provide mapping that confirms the locations of underbuilt roads, pads and embankments; Analyze thickness of all existing underbuilt roads, pads and embankments; Monitor and map locations of persistent ponded water near infrastructure and identify any expanding ponds.	The 2024 Annual Report will show locations of underbuilt roads, pads and embankments, an isopach map that shows current road thicknesses, and a map showing ponding locations with results from 2023 and 2024 inspections.
CIRNAC #3	Summarize geotechnical investigations undertaken each year and comment on sensitive landforms including any associated mitigation and monitoring measures. This should include the Primary Pond, Umwelt Dam and other works in 2023.	B2Gold Nunavut will provide a more concise overview of the geotechnical investigations, including sensitive landforms, that were undertaken in 2023 and 2024 in the 2024 Annual Report.
CIRNAC #4	Aquatic baseline report for 2023 was not included in the 2023 Annual Report. Provide consolidated, up-to-date aquatic monitoring data in each Annual Report; provide the summarized results of the current and past sampling and ensure all data are included; include any updated AEMP reports in all future Annual Reports.	The 2023 Surface Water Report is attached to these responses.
CIRNAC #5	Provide quantitative vegetation data from vegetation monitoring plots to facilitate long-term comparisons and quantify potential impacts from the Project; and, Clarify how the unknown graminoid species detected	Going forward, photographs will be assessed with a quantitative disturbance ranking in addition to comprehensive monitoring every 3 years. An invasive graminoid species would likely be reproducing quickly with more identifiable inflorescences, establishing itself in disturbed

Comment No.	Comment/Recommendation	B2Gold Nunavut Response
	in 2022 was determined to be non-invasive.	habitats and outcompeting native species. This was not the case.
CIRNAC #6	Confirm amount of pre-stripping material stockpiled or used for other purposes at site along with supporting analysis demonstrating ecosystemic protection; Confirm how all water is captured and managed and provide monitoring results in future Annual Reports.	Ponding water occurred in small volumes and ultimately evaporated. If ponding water occurs in volumes requiring management, water quality sampling will be completed in advance as suggested.
CIRNAC #7	Provide status updates on the relocation of employees within Nunavut if there are no concerns about sharing the data publicly.	The inaugural 2022 Inuit Personnel Survey indicated no respondents had moved to a new community in the prior 12 months. The next survey is anticipated to occur later in 2024. Annual HR reporting indicates no employees relocated into or out of Nunavut in 2023.

3.3.2.4 *Environment and Climate Change Canada*

A summary of the comments from ECCC on the Proponent's 2023 Annual Report and B2Gold Nunavut's responses is provided below in Table 3-7.

Table 3-7: Environment and Climate Change Canada's Comments and B2Gold's Response for the 2023 Annual Report for the Back River Gold Mine Project.

Comment No.	Comment/Recommendation	B2Gold Nunavut Response
ECCC-1	Compare monitored NO2 concentrations with the Canadian Ambient Air Quality Standards (CAAQS) in the annual reports, in addition to the already considered standards.	A comparison to CAAQS for NO2 will be made in the 2024 Annual Report.
ECCC-2	Provide a rationale why particulate matter (TSP and PM2.5) monitoring was not conducted in 2023 and indicate when it will occur.	Installation of the particulate monitoring station has been delayed due to logistical issues but is expected to be completed by Fall 2024.
ECCC-3	Notify ECCC /Canadian Wildlife Service directly for instances involving interactions an/or potential disturbance of migratory birds or nests, and any mortality events as they occur.	ECCC/Canadian Wildlife Service will be notified directly of any mortalities of migratory birds. Should any nest need to be removed for logistical reasons, B2Gold will contact ECCC prior to removing the nest.
ECCC-4	Clarify why clearing was necessary during the breeding bird nesting window in 2023 and provide rationale	Clearing of 0.93 ha was required during the breeding season in 2023 as the Back River Mine is currently in the construction phase. Pre-

Comment No.	Comment/Recommendation	B2Gold Nunavut Response
	for any occasion in the future where clearing occurs during nesting times.	clearing surveys occurred, and no nests were observed.
ECCC-5	Consider the Horned Grebe Western Population as a <i>Species at Risk Act</i> Schedule 1 species of Special Concern.	The list of species at risk will be reviewed and updated as appropriate in the 2024 WMMP Report.
ECCC-6	Submit an updated “Notice of Change” if a situation under subsection 3(5) of the Environmental Emergency Regulations occurs.	This was completed in July 2024.
ECCC-7	Provide a description of events that led to the release of 5000 L of Petroleum, lubricating oil, and measures taken to prevent future releases. Annual reports should include copies of spill reports and detailed descriptions including surrounding circumstances and follow-up measures taken.	The spill was 2 L, not 5000 L. Future reports will include additional details on spills and follow up measures taken.
ECCC-8	Clean up the oil observed in Image M-43 of the Geotechnical Inspection Report if not already completed. Implement procedures to ensure future dismantling of secondary containments does not release residual oil.	The sheen was investigated and determined to be naturally occurring (organic) rather than a sheen caused by petroleum products.
ECCC-9	Provide an updated list of hazardous materials stored at the Project in the Spill Contingency Plan, with location, volume/mass, types and numbers of containers.	Bulk fuel volumes and other hazardous substances listed on the E2 Regulations Schedule 1 Lists of Substances are reported via the ECCC SWIM Account. Current secondary containment consists of utilizing the existing engineered bulk containment facilities and SEI Industries Arctic-Grade Instaberm. B2Gold will provide an updated Hazardous Materials Management Plan to the NIRB following approval from the NWB.
ECCC-10	Provide a summary of the issues that were noted by CIRNAC during their site inspections and any corrective actions taken.	This detail will be provided in future annual reports.
ECCC-11	No results were provided for 2023. Proponent should provide the 2023 Aquatic Baseline Report.	The 2023 Baseline Surface Water Report has been enclosed as Appendix B to these responses.

3.3.2.5 Fisheries and Oceans Canada

A summary of the comments from DFO on the Proponent's 2023 Annual Report and B2Gold Nunavut's responses is provided below in Table 3-8.

Table 3-8: Fisheries and Oceans Canada's Comments and B2Gold's Response for the 2023 Annual Report for the Back River Gold Mine Project.

Comment No.	Comment/Recommendation	B2Gold Nunavut Response
DFO-1	Confirm that a Request for Review will be submitted to DFO prior to increasing water withdrawal from Goose Lake.	A Request for Review will be submitted to DFO prior to increasing water withdrawal rates from Goose Lake.
DFO-2	Work with DFO to update map of shipping routes within the Wildlife Mitigation and Monitoring Program Report to illustrate aggregation areas, seasonality, as well as marine mammal species expected to be encountered.	B2Gold Nunavut will engage DFO on this topic.
DFO-3	Provide copies of the most recent Marine Monitoring and Marine Shipping standard operating procedures as well as the Shipping Management Guidelines brochures that were distributed to the shipping companies and contractors.	The Marine Monitoring and Marine Shipping standard operating procedures and the Shipping Management Guidelines brochures will be provided to DFO.
DFO-4	Describe monitoring and mitigation measures in place to minimize the risk of aquatic invasive species. Consider implementing an aquatic invasive species monitoring program if this is not already being done. Provide details of the shipping companies used, where the ships are coming from (freshwater/marine), and the risks of the introduction of aquatic non-indigenous or invasive species.	Vessels supplying the mine are unloading equipment/fuel and taking on ballast water, rather than expelling ballast water. Names of vessels supplying the mine are provided in the annual report.
DFO-5	Work with DFO to identify high risk areas where impacts to marine mammals could occur and update marine mammal monitoring protocol to include a seasonal component and increased monitoring efforts.	B2Gold Nunavut will engage DFO on this topic. Note that shipping occurs only during the open water season and therefore there is limited value to providing seasonal mapping for vessel captains.
DFO-6	Monitor and model underwater noise from shipping vessels with support from DFO, and mitigate if necessary.	Vessels supplying the Project slow down when they are within Bathurst Inlet to mitigate potential effects of noise. Monitoring for vessel noise through the common shipping route used by multiple vessels is beyond the scope for any

Comment No.	Comment/Recommendation	B2Gold Nunavut Response
		individual company and would be better addressed by government. B2Gold Nunavut would be willing to collaborate on a regional study of noise by supplying vessel type and transit dates.

3.3.2.6 Health Canada

Health Canada noted they had reviewed the Proponent's *2023 Annual Report* and have no comments to provide at this time.

3.3.2.7 Transport Canada

A summary of the comments from TC on the Proponent's *2023 Annual Report* and B2Gold Nunavut's responses is provided below in Table 3-9.

Table 3-9: Transport Canada's Comments and B2Gold's Response for the 2023 Annual Report for the Back River Gold Mine Project.

Comment No.	Comment/Recommendation	B2Gold Nunavut Response
TC-03	The 2023 Marine Shipping – Wildlife Mitigation and Monitoring Standard Operating Procedure was not included in the <i>2023 Annual Report</i> . Vessel operators serving the Project should be made aware of the Canadian Coast Guard's <i>2024 Annual Notice to Mariners</i> .	Vessel operators will be made aware of the 2024 Annual Notice to Mariners if they are not already.
TC-04	The <i>Shipping Management Plan</i> should be updated to reflect the requirements of the Ballast Water Regulations. A new version of the Shipping Management Plan should be included within the Proponent's 2024 Annual Report.	The Shipping Management Plan will be updated to reflect the requirements of the Ballast Water Regulations.
TC-05	Proponent should note the publication of two (2) recent guidelines for biofouling management.	B2Gold Nunavut thanks TC for their comment.
TC-07	Provided B2Gold files a Transfer of Ownership for the three Navigation Protection Program authorizations, the Annual Report should be updated to refer to B2Gold where it mentions these authorizations.	The update will be made in the 2024 Annual Report pending Transfer of Ownership.
TC-09	Annual reports should include copies of documents such as manifests regarding the transportation of dangerous goods and hazardous materials.	Copies of the interprovincial movement of hazardous waste manifests are maintained by KBL as well as by B2Gold Nunavut and are submitted to the

Comment No.	Comment/Recommendation	B2Gold Nunavut Response
		Government of the Northwest Territories. B2Gold Nunavut does not feel it is necessary to include copies in the annual reports but can include the manifest number(s) going forward.

3.4 NIRB Monitoring

3.4.1 *Compliance with the NIRB Project Certificate*

The NIRB's comprehensive assessment of the Project Certificate is provided in Appendix A. During the 2023-2024 reporting period, the Proponent has continued to provide the required plans, information and programs required under in the Project Certificate. Non-compliances are noted, and where appropriate, brought forward as part of this year's recommendations to the Proponent. Due to the early stages of development of the Back River Project, it is noted that some Terms and Conditions as contained within Project Certificate No. 007, Amendment No. 01 may not be applicable for this monitoring period and/or have not yet been thoroughly implemented at this time by B2Gold Nunavut.

3.4.2 *NIRB's Site Visit and Public Information Session*

The NIRB staff completed a site visit to the Back River Project on August 5-6, 2024 and observed that facilities at the Goose Lake Property and Marine Laydown Area were generally maintained according to required environmental protection measures under Project Certificate No. 007 (December 2017). The NIRB site visit occurred prior to the publication of Project Certificate No. 007, Amendment No. 01 and was therefore conducted under the original Project Certificate. NIRB staff identified the following specific areas for improvement:

- Limited translation of signage around site and in the accommodation facility.
- Several laydown areas contained small plastic, wood and metal debris that posed a hazard and needed to be cleaned up.
- Some barrels and totes containing hazardous material were stored outside of secondary containment. B2Gold Nunavut staff were responsive and noted that these barrels and totes would be moved to appropriate storage locations immediately.
- Secondary Containment of the diesel tank farm at the Exploration Camp contained diesel from a spill. B2Gold Nunavut site staff noted that they were in contact with a contractor and working on testing this water and getting an oily water separated to properly dispose of it. NIRB staff recommend prioritizing this work to ensure that it has minimal impact on the environment.
- A seacan at one of the Goose Lake laydowns was stored unsafely and at risk of falling.

4. Findings and Recommendations

4.1 Monitoring Officer Findings

B2Gold Nunavut has provided required reporting under the Project Certificate, and as applicable to the current construction phase of the project; however, Monitoring Officers have noted where additional information has not been provided in respect of the following aspects of the applicable Terms and Conditions and/or as required under applicable management plans or monitoring programs. In addition, the NIRB staff have also provided the following observations regarding the Proponent's implementation of the Project Certificate Terms & Conditions.

1. In [Appendix A](#) of the NIRB's annual Monitoring Report under Board guidance on general regulatory and administrative responsibilities, requirement 12, B2Gold Nunavut is required to maintain a publicly accessible Project-specific web portal or web page for monitoring and reporting information submitted to regulatory authorities. During the 2023-2024 Monitoring period, NIRB staff noted that B2Gold has not established a project website. NIRB staff request that B2Gold Nunavut develop a website to host and update monitoring and management plans as well as their own annual reports to ensure that they are readily available to the Public.
2. When reviewing the 2023 Annual Report, Air Quality Monitoring Report, NIRB staff noted there were no results provided for Total Suspended Particles (TSP) for PM 2.5 (Particulate Matter) as well as a lack of comparisons from monitoring results to the original FEIS predictions. In subsequent reports, NIRB requests that B2Gold Nunavut report on TSP for PM 2.5 and compare all variables against FEIS predictions to allow for verification of Monitoring data in relations to the Impact Assessment for the Project.
3. Term and Condition 12 of Project Certificate No. 007 requires the Proponent to monitor for potential permafrost degradation near project infrastructure. In its 2023 Annual Report, B2Gold Nunavut provided a Thermal Monitoring Plan demonstrating efforts towards providing the appropriate information. The NIRB appreciates the new monitoring plan provided by the Proponent and looks forward to further actions to be presented in the 2024 Annual Report.
4. Through the 2023 Annual Report and the NIRB site visit in August 2024, the potential for wildlife attractants on site was discussed especially near the incinerator facilities at Goose Lake and resulted in two wolverines being euthanized in 2023. The KIA directly commented on these concerns in their comments on the 2023 Annual Report. B2Gold indicated that it would be discussing the matter at the next available Terrestrial Advisory Group meeting and would work with the group to assess current protocols, practices and potential changes. NIRB Staff are requesting an update regarding these discussions along with any determined course of action to be reported to the Board as part of the Proponents 2024 Annual Report for the Project.
5. Term and Condition 64 of Project Certificate No. 007, notes that the Proponent shall have in place appropriate ship-based marine mammal monitoring programs and protocols. In review of the 2023 Annual Report, vessels in 2022 and 2023 did not conduct any ship-based marine mammal monitoring. With the project activity increasing through

construction and moving into operations in 2025, there has been an increase in the number of Project-related vessels entering Bathurst Inlet, placing greater importance on collecting this marine mammal data. As a result, NIRB staff are requesting that B2Gold Nunavut provide an update to the Board in the 2024 Annual Report articulating how they intend to deliver the required monitoring program in future shipping seasons.

4.2 Board Recommendations

While the general monitoring information was considered using the original Back River Project Certificate No. 007 (December 2017), and any changes included in Amendment No. 01 (August 7, 2024) will be the basis of reporting starting in the next monitoring period, the Board required the following updated plans be submitted within 60 days of the release of Amendment 01 to the Project Certificate:

- Noise Abatement Plan (T&C 10);
- Vegetation Monitoring Plan (T&C 34; and
- Wildlife Mitigation and Monitoring Plan (WMMP, T&C 37).

As noted in Section 3.2 of this report, on October 8, 2024 the NIRB received the updated Wildlife Mitigation and Monitoring Plan, but has not yet received the updated Noise Abatement Plan or the Vegetation Monitoring Plan.

Recommendation 1: As the updated Noise Abatement Plan and the Vegetation Monitoring Plan were not provided within 60 days of the release of Amendment No. 01 to Project Certificate No. 007 as required by amended Terms and Conditions #10 and #34, B2Gold Nunavut shall provide the updated Noise Abatement Plan and Vegetation Management Plan within 30 days of receiving the NIRB Monitoring Officers' 2023-2024 Report.

During the August 2024 site visit to the Back River Project, NIRB staff noted the secondary containment berm around the tank farm at the Goose Lake exploration site was holding a significant amount of contaminated water. Upon discussions with B2Gold Nunavut staff, they noted that they were currently in the process acquiring an “Oily Water Separator” to treat and discharge it as effluent once/if it reached discharge criteria.

Recommendation 2: The Board requests that B2Gold Nunavut provide an update on this initiative in the 2024 Annual Report including an action plan and timeline for treatment of the water in the secondary containment berm.

5. Conclusion

B2Gold Nunavut has increased its activities at the Back River Project through a full year of construction activities and has continued providing the required updates, plans and information to meet their obligations of Project Certificate No. 007, Amendment 01. As the Project progresses, NIRB expects further monitoring activities to confirm predictions and commitments as presented in the Final Environmental Impact Statement (FEIS), FEIS Addendum, Modification Package, Energy Centre Proposal, and all active management and monitoring plans. Pursuant to sections 12.7.2 and 12.7.3 of the *Nunavut Agreement*, the NIRB will continue to work with B2Gold Nunavut and other Authorizing Agencies to conduct and

coordinate monitoring efforts, and to review results in accordance with the requirements set out in the Back River Project Certificate No. 007, Amendment No. 01.

Prepared by: Cory Barker, M.Sc.
Title: Manager, Project Monitoring
Date: February 10, 2025
Signature:



Reviewed by: Tara Arko, EP
Title: Director, Operations
Date: February 10, 2025
Signature:



APPENDIX A: COMPLIANCE WITH TERMS AND CONDITIONS AND COMMITMENTS OF PROJECT CERTIFICATE 007

Board Guidance on General Regulatory and Administrative Responsibilities

Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
NIRB Monitoring Responsibilities			
1. NIRB to appoint Monitoring Officer(s)	Active In Compliance	Active In Compliance	
2. NIRB to report annually on the monitoring program (in English, Inuinnaqtun, and Inuktitut)	Active In Compliance	Active In Compliance	
3. NIRB to conduct periodic community meetings updates regarding its Monitoring Program	Active In Compliance	Active In Compliance	
4. NIRB to schedule periodic site inspections.	Active Non-compliance	Active In Compliance	

Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
General Regulatory Requirements			
5. Proponent must obtain all required federal and territorial permits and other approvals and shall comply with the requirements of such regulatory instruments.	Active In Compliance	Active In Compliance	The Proponent has the permits it requires for the level of construction it is currently conducting.

Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
6. Duty to Comply with environmental laws and regulations and/or regulatory instruments, prompt action to remedy non-compliance and report any non-compliance.	Active In Compliance	Active In Compliance	Incidents were reported as required and no actions were taken by Regulatory Authorities.
7. Posting of adequate performance bonding.	Active In Compliance	Active In Compliance	
			Monitoring Records
8. Information requirements for monitoring reporting.	Active In compliance	Active In compliance	See Proponent's <i>2023 Annual Report</i>
9. Make significant monitoring results and/or summaries of significant results available in English, Inuinnaqtun, and Inuktitut, to the extent feasible.	Active In Compliance	Active In compliance	The executive summary in the <i>2023 Annual Report</i> is available in Inuinnaqtun and Inuktitut.
10. Maintain the records, including results, of all Project-related monitoring data and analysis for the life of the Project, including closure and post-closure monitoring.	Active In Compliance	Active In Compliance	
11. Maintenance of an up-to-date Environmental Impact Statement and the updated environmental monitoring programs developed for the Project as new information is collected.	Active In Compliance	Active In Compliance	New versions of environmental management and monitoring plans are issued as appropriate with several updates having been included in the <i>2023 Annual Report</i> and other updates provided following issuance of Project Certificate No. 007, Amendment No. 01.
12. Publicly accessible Project-specific web portal or web page to make available in a central location all significant non-confidential	Active Deficient – In Progress	Active Deficient – In Progress	The NIRB notes that no Project reports or management plans are available on B2Gold Nunavut's website.

Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
monitoring and reporting information submitted to regulatory authorities.			The NIRB requests that the Proponent have a web portal dedicated to the filing of all non-confidential materials for the Back River Project to be the central repository for the Project and to make it easier for individuals to locate all materials related to the project.
On-going Engagement in Project Monitoring, Modelling, Management and Reporting			
13. Provide on-going opportunities for consultation and comment on any substantive revisions to the Project-specific monitoring program, modelling, studies, management plans, management measures, and reporting.	Active In Compliance	Active In Compliance	Section 2 of B2Gold Nunavut's <i>2023 Annual Report</i> lists engagement activities undertaken in the past year, including engagement with communities, governments and regulators, and working groups.
14. To the extent feasible, the NIRB will provide an opportunity for comment on any substantive revisions to the Project-specific monitoring, modelling, studies, management plans, management measures, and reporting provided by the Proponent under the Project Certificate.	Active In Compliance	Active In Compliance	Completed by NIRB.

Project Specific Terms and Conditions

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
1	Have an Air Quality Monitoring and Management Plan in place.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Air Quality Monitoring and Management Plan</i> (2019) (NIRB Doc ID: 329195).
2	Demonstrate that air quality emissions remain within predicted levels.	Active Deficient In-Progress	Active Deficient In-Progress	<ul style="list-style-type: none"> Results of 2023 passive NO₂ and dustfall monitoring are provided in B2Gold Nunavut's <i>2023 Annual Report</i> (some values missing due to data issues). B2Gold Nunavut notes that measured values are generally below the applicable standards. No comparison is made to predictions made in the FEIS. No results were provided for Total Suspended Particulates (TSP) or Fine Particulate Matter (PM_{2.5}).
3	Have a Dust Management and Monitoring Plan in place.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The <i>Air Quality Monitoring and Management Plan</i> (2019) (NIRB Doc ID: 329195) includes a <i>Fugitive Dust Reduction Plan</i>. Updates are planned for 2024. Dustfall monitoring results are included in the Proponent's <i>2023 Annual Report</i>.
4	Have an Incineration Management Plan in place.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Incineration Management Plan</i> (2020), NIRB Doc ID: 329196.
5	Provide the results of stack testing conducted on incinerators.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> No stack testing has been conducted. Stack test will be completed upon commissioning of the incinerator and reported as required.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				<ul style="list-style-type: none"> • <i>Incineration Management Plan</i> (2020), NIRB Doc ID: 329196.
6	Maintain a Greenhouse Gas (GHG) Reduction Plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • A GHG Reduction Plan was included in the revised <i>Air Quality Monitoring and Management Plan</i> (2019) (NIRB Doc ID: 329195). • Results of the 2023 monitoring program were included in the Proponent's <i>2023 Annual Report</i> (NIRB Doc ID: 349951).
7	Maintain a Mine Closure and Reclamation Plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • <i>Interim Closure and Reclamation Plan</i> last updated in 2021, NIRB Doc ID: 337487.
8	Provide a summary of meteorological conditions experienced within the project.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • Meteorological data are presented in B2Gold Nunavut's <i>2023 Annual Report</i> (NIRB Doc ID: 349951).
9	Demonstrate consideration for noise reduction measures when siting and constructing the project and to demonstrate that noise level remains with reasonable limits.	Active Deficient – in progress	Active Deficient – in progress	<ul style="list-style-type: none"> • <i>Noise Abatement Plan</i> (2015) (NIRB Doc ID: 301426). • B2Gold Nunavut noted its noise monitoring will begin in 2024. <p>Note: The NIRB looks forward to seeing the results of noise monitoring in the Proponent's <i>2024 Annual Report</i>, with a comparison to predictions made in the FEIS and applicable legislation /standards.</p>

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
10	Demonstrate consideration for noise to be further mitigated during project activities.	Active Deficient – in progress	Active Deficient – in progress	<ul style="list-style-type: none"> Noise Abatement Plan (2015) (NIRB Doc ID: 301426). B2Gold Nunavut noted noise monitoring will begin in 2024. <p>Note: The NIRB looks forward to seeing the results of noise monitoring in the Proponent's 2024 <i>Annual Report</i>, with a comparison to predictions made in the FEIS and applicable legislation /standards.</p>
11	Conduct permafrost mapping to inform detailed design and plan for changing permafrost conditions.	Active Deficient – in progress	Active Deficient – in progress	<ul style="list-style-type: none"> Thermal Monitoring Plan provided as part of the 2023 <i>Annual Report</i> (NIRB Doc ID: 349951). New monitoring ground temperature monitoring locations were established in 2023. An annual ground temperature monitoring report will be produced starting in 2024. There has been no permafrost mapping for background sites included in the 2021, 2022, or 2023 <i>Annual Reports</i> and no comparison made to FEIS predictions.
12	Monitor and mitigate effects of the project on the permafrost.	Active Deficient in – progress	Active Deficient in – progress	<ul style="list-style-type: none"> Thermal Monitoring Plan provided as part of the 2023 <i>Annual Report</i> (NIRB Doc ID: 349951). An annual ground temperature monitoring report will be produced starting in 2024. Some areas of permafrost degradation near Project infrastructure were noted in the

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				<p>Proponent's 2023 Annual Geotechnical Inspection Report.</p> <ul style="list-style-type: none"> No trends are presented in the Proponent's reporting.
13	Undertake additional geotechnical investigations as needed to identify and mitigate project impacts on sensitive landforms.	Active In Compliance	Active Deficient in – progress	<ul style="list-style-type: none"> B2Gold Nunavut's 2023 Annual Report included the 2023 Annual Geotechnical Inspection Report as Appendix E (NIRB Doc IDs: 349371-349375). However, there was no commentary regarding sensitive landforms nor any associated mitigation and monitoring measures.
14	Provide a Waste Management Plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Landfill and Waste Management Plan (2017) NIRB Doc ID: 337488. B2Gold Nunavut submitted an updated version to the Nunavut Water Board in 2022 and is waiting for approval. Once received the plan will be submitted to the following NIRB's annual report.
15	To have a Progressive Reclamation Plan in place.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Interim Closure and Reclamation Plan (2021), NIRB Doc ID: 337487. No progressive reclamation activities have been undertaken to date as mining activities have not yet begun.
16	To develop site-specific quarry operation and management plans.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Back River Project Quarry Management Plans (2020), NIRB Doc ID: No.337486.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
17	To conduct tests of the tailings and treatment sludges and to evaluate the potential for remobilization of arsenic.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> • Tailings are not yet being produced. • <i>Tailings Management Plan</i> (November 2020), Appendix K to the <i>2021 Annual Report</i>, NIRB Doc ID: 338510. • An updated (2022) plan is pending approval by the Nunavut Water Board.
18	To undertake an infill Geotechnical Characterization Program.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • Geotechnical drilling occurred in 2018 and 2021. • B2Gold Nunavut's currently approved mine plan no longer contains the Tailing Settlement Facility and associated dam. • Additional drilling will occur if the TSF dam is to be constructed.
19	To maintain a Saline Water Management Plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • <i>Water Management Plan</i> (October 2020), NIRB Doc ID: 337485 • An updated version (2022) of the water management plan is pending approval by the Nunavut Water Board. • At this time, there are no saline water inflows requiring monitoring at the Back River Project.
20	To develop a Thermal Monitoring Plan.	Not Yet Active Not Yet Applicable	Active In Compliance	<ul style="list-style-type: none"> • Thermal Monitoring Plan (NIRB Doc ID: 349359) provided as part of the <i>2023 Annual Report</i>.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
21	Maintain an Aquatic Effects Monitoring Plan and submit results annually.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • <i>Aquatic Effect Monitoring Plan (AEMP)</i> (October 2017), NIRB Doc ID: 337490. • 2021 and 2022 Aquatic baseline data reports were provided in the <i>2023 Annual Report</i> NIRB Doc IDs: 349360 and 349361). • The 2023 Surface Water Quality Report was included with the Proponent's response to Parties' comments on the annual reported in August 2024.
22	To maintain a Site Water Monitoring and Management Plan that minimizes and appropriately manages all contact water.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • <i>Water Management Plan</i> (October 2020), NIRB Doc ID: 337485. • An updated version (2022) is currently with the Nunavut Water Board (NWB) for approval.
23	To maintain an appropriate setback distance between quarries and fish-bearing or permanent waterbodies.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • Setback distances have been established in the <i>Borrow Pits and Quarry Management Plan</i> (2020), NIRB Doc ID: 337486 • Setback distances were adhered to in 2023.
24	To prevent blockages or restrictions to fish passages.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • Rascal Strea West culverts were installed in May 2023 and September 2023 in accordance with a Letter of Advice issued for the works by DFO in 2022 following submission of a Request for Review. • The associated construction monitoring report (NIRB Doc ID: 349362) was submitted to DFO

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				<p>in December 2023 and included in the Proponent's <i>2023 Annual Report</i>.</p> <ul style="list-style-type: none"> Field studies are planned for spring 2024 to confirm fish passage through culverts and will be reported on in next year's annual report.
25	To mitigate impacts of explosives use on fish habitat.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> No blasting activities to date have occurred within or near the setback distance established by DFO Guidelines (Wright and Hopkey 1998). DFO will be consulted if blasting near fish bearing waters in 2024.
26	To minimize impacts to the migration of Arctic Grayling.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> B2Gold Nunavut has been working with Parties on planned work on Rascal Stream West and Rascal Stream West diversion (fishway). Monitoring plans will be submitted to the NIRB at least 30 days before construction of the fish passage.
27	To minimize impacts to freshwater fish habitat that may be used for water withdrawal.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Prior to the construction of the 2023 Winter Ice Road, B2Gold Nunavut submitted its water withdrawal study to the NWB. Results of the Proponent's assessment of potential impacts on downstream Arctic Grayling habitat from a proposed Goose Lake water withdrawal increase associated with the 2020 Modification Package were included in the <i>2023 Annual Report</i> (NIRB Doc ID: 349363).

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				<ul style="list-style-type: none"> • A <i>Request for Review</i> will be submitted to DFO prior to increasing water withdrawal from the lake.
28	To minimize impacts to fish from the Winter Ice Road	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • B2Gold Nunavut follows all applicable standards and best practices to avoid harm to fish including implementing all recommendations within the Letters of Advice issued by DFO.
29	To minimize impacts from Water Crossings.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • B2Gold Nunavut follows all applicable standards and best practices to avoid harm to fish including implementing all recommendations within the Letters of Advice issued by DFO.
30	To monitor culverts and to ensure no barriers to fish.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • Rascal Strea West culverts were installed in May 2023 and September 2023 in accordance with a Letter of Advice issued for the works by DFO in 2022 following submission of a Request for Review. • The associated construction monitoring report (NIRB Doc ID: 349362) was submitted to DFO in December 2023 and included in the Proponent's <i>2023 Annual Report</i>. • Field studies are planned for spring 2024 to confirm fish passage through culverts and will be reported on in next year's annual report.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
31	To provide monitoring updates on the Rascal Stream Fish Passage.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> Construction of the Rascal Stream diversion (fishway) has not yet occurred.
32	To minimize the Site Footprint.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The Proponent's <i>2023 Annual Report</i> maps the current footprint and the lists the area of ecosystem/vegetation losses to date within the Goose Property and Marine Laydown Area. Total losses are lower than predicted in the FEIS (2015).
33	To prevent the introduction of Invasive Species.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Standard Operating Procedure</i> (2018) ensures all equipment and bulk supplies arriving at the Project site are free of soil and plant debris. <i>2023 Annual Report</i> includes expediter forms verifying all equipment and bulk supplies from August -September 2023 were inspected and confirmed to be free of soil and plant debris on shipment. Invasive plant monitoring is conducted every 3 years per the <i>Vegetation Monitoring Plan</i> (2020), NIRB Doc ID: 328160.
34	To have a Vegetation Monitoring Plan in place.	Active In Compliance	Active Deficient In-Progress	<ul style="list-style-type: none"> <i>Vegetation Monitoring Plan</i> (2020), NIRB Doc ID: 328160 - Under PC. No 007, Amendment No. 01, the Proponent is required to submitted an updated plan. See 2024 Board Recommendation #1.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				<ul style="list-style-type: none"> The Proponent has indicated that additional monitoring plots will be established in 2024 to replace those lost due in 2023 to construction and to realign with the change in alignment of the WIR. The Proponent has indicated that going forward, the photographic monitoring will include a quantitative disturbance rating.
35	To develop a progressive revegetation program.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> A progressive revegetation program was included in the <i>Interim Closure and Reclamation Plan</i>, NIRB Doc ID: 337487. Information regarding the revegetation strategies will be further developed within the next three (3) years.
36	To include a revegetation strategy within its Mine Closure and Reclamation Plan (ICRP).	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> A progressive revegetation program was included in the <i>Interim Closure and Reclamation Plan</i>, NIRB Doc ID: 337487. Information regarding the revegetation strategies will be further developed within the next three (3) years.
37	To have in place a Wildlife Mitigation and Monitoring Plan (WMMPP).	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933.
38	To monitor wildlife with relevant parties.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The Proponent is working with the Government of Nunavut (GN) and the Government of the

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				<p>Northwest Territories (GNWT) on collaborative herd-scale caribou monitoring as described in the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933</p> <ul style="list-style-type: none"> The Proponent is also working with the KIA and GN as part of the Caribou Technical Advisory Group (CTAG) and the Inuit Environmental Advisory Committee (IEAC) to discuss Project monitoring, including monitoring for the Back River Project Energy Centre specifically.
39	To have a staged project activity reduction plan to mitigate potential impacts to caribou.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The staged reduction plan is described in the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933.
40	To ensure the threshold distances used to trigger caribou mitigation consider an appropriate biological buffer and lag time when based on satellite collar data.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The Proponent continues to use collar data with an agreed upon biological buffer to monitor caribou per the <i>Wildlife Mitigation and Monitoring Program Plan</i> (NIRB Doc IDs: 351932 & 351933).
41	To mitigate impacts on caribou during the July 26 to August 31 period when there is an increased potential of caribou presence.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933 makes reference to this heightened potential of caribou during the summer months.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
42	To ensure mitigation measures apply to all caribou.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures are described in <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. The WMMP includes reference to multiple herds of caribou.
43	To develop procedures should wildlife be deemed project tolerant.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> In 2018 and 2019, procedures to deter wildlife if deemed project tolerant were discussed on multiple occasions with the Kitikmeot Inuit Association (KIA) and the GN. Details of when and how various wildlife should be deterred from the Project area are found in the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933.
44	To develop mitigation measures for muskox.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures are described in <i>Wildlife Mitigation and Monitoring Program Plan V</i> (2024), NIRB Doc IDs: 351932 & 351933.
45	To mitigation potential disturbances to wildlife movement.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures are described in <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. The winter ice road was constructed in 2023 in such a way as to allow caribou and other animals to cross the road (e.g. keeping snowbanks low and feathered). Details are provided in the <i>2023 Annual Report</i>.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
46	To report all direct wildlife mortalities.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures to prevent wildlife mortalities are described in <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. The Proponent's 2023 Annual Report notes that 14 wildlife mortalities occurred at the Project in 2023. <p>Note: Environment and Climate Change Canada (ECCC) has indicated they prefer to receive notifications of avian mortalities as they occur rather than through annual reporting.</p>
47	To mitigate wildlife interaction with the attenuation ponds and/or tailings storage areas.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> To date, no water attenuation ponds, or tailings storage areas have been constructed. Mitigation measures and monitoring are described in <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. <p>Note: In their response to the KIA's suggestion that the Proponent proactively develop ways to mitigate potential interaction with ponds, the Proponent has indicated they have developed a standard operating procedure. The Proponent is requested to provide a copy of this standard operating procedure to the NIRB to be posted on the Public Registry.</p>

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
48	To limit wildlife attraction to the project.	Active In Compliance	Active Deficient – In Progress	<ul style="list-style-type: none"> Mitigation measures and monitoring are described in <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. In 2023 bear bangers were deployed to deter wolverine on three occasions, and grizzly bear on two occasions from within the camp perimeter. It is noted that grizzly bear and wolverine also had to be deterred in 2022. The proponent stated that enhanced mitigation to prevent attraction of wildlife to the site was introduced in 2023 following the destruction of two wolverines that were repeatedly seen on site trying to access the incinerator building and posing a risk to staff safety. <p>Note: The NIRB encourages the Proponent to meet with the TAG to discuss this matter as requested by the KIA and report and action items to the Board in the 2024 Annual Report.</p>
49	To report annually on the terrestrial wildlife monitoring to the Nunavut Impact Review Board.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Monitoring in 2023 occurred in accordance with the <i>Wildlife Mitigation and Monitoring Program Plan</i> (V 12, April 2023) and results were reported on in the <i>2023 Annual Report</i> (Appendix K: <i>2023 Construction Wildlife</i>

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				<i>Mitigation and Monitoring Report</i> , NIRB Doc ID: 349928).
50	To report annually on the effectiveness of ongoing monitoring and mitigation efforts.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> 2023 wildlife monitoring results are provided in the <i>2023 Construction Wildlife Mitigation and Monitoring Program Report</i> (NIRB Doc ID: 349928), Appendix K to the <i>2023 Annual Report</i>. 2023 was the first year of construction monitoring; as such no trends could yet be detected.
51	To establish a Caribou Technical Advisory Group (CTAG) to provide technical oversight on caribou mitigation and monitoring.	Active Deficient – In Progress	Active In Compliance	<ul style="list-style-type: none"> The CTAG was formally established through the Inuit Impact Benefit Agreement (IIBA) between the Proponent and the KIA. B2Gold Nunavut is in the process of finalizing the CTAG Terms of Reference with the KIA and GN. The CTAG met twice in 2023 and again in early 2024. In response to last year's Board recommendations, the Proponent provided additional details of recent CTAG meetings (NIRB Doc ID: 348359) Membership and function of the CTAG discussed during the NIRB's review of the Energy Centre Proposal; the Board encouraged

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				current members of the CTAG to engage further with local communities.
52	To ensure caribou protection from additional mineral exploration.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> In the <i>2023 Annual Report</i> B2Gold Nunavut stated that there is currently no planned or occurring mineral exploration within its mineral tenures outside of the Project Development Area that is based out of or substantially supported by the Back River Project.
53	To develop and implement mitigation measures and monitoring for birds and bird habitat.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures and monitoring are described in the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. The updated WMMPP includes targeted measures to protect birds from the Energy Centre Project, particularly the wind turbines.
54	To mitigate impacts to avian Species at Risk through avoidance.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc ID: 351932 & 351933 describes how setbacks will be used to protect active nests. The <i>2023 Construction Wildlife Mitigation and Monitoring Program Report</i> (NIRB Doc ID: 349928), Appendix K to the <i>2023 Annual Report</i>, notes that pre-clearing bird nest surveys

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				occurred in the summer of 2023 and no nests were found.
55	To ensure that mitigation and monitoring strategies developed for Species at Risk are updated.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures and monitoring are described in the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. The WMMPP includes a list with current risk rankings /risk status for species at risk. <p>Note: ECCC has recommended adding Horned Grebe Western Population as a SARA Schedule 1 species of Special Concern.</p>
56	To mitigate impacts to birds from construction and clearing activities.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation details provided in <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933 The <i>2023 Construction Wildlife Mitigation and Monitoring Program Report</i> (NIRB Doc ID: 349928), Appendix K to the <i>2023 Annual Report</i>, notes that pre-clearing bird nest surveys occurred in the summer of 2023 and no nests were found.
57	To mitigate impacts to raptors from project construction.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures described in the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				<ul style="list-style-type: none"> Specific updates for the Energy Centre Project infrastructure are included in the most recent WMMPP. The <i>2023 Annual Report</i> indicates that no deterrence or removal of raptor nests was required in 2023. No raptor nests were observed.
58	To include mitigation measures within the Wildlife Mitigation and Monitoring Plan for seaducks and waterfowl.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Specific measures to mitigate potential impacts to seaducks and waterfowl from shipping activities are described in the WMMPP (Version 12, April 2023) in Section 13 and in the Marine Shipping Standard Operating Procedure (Nov 2022). <p>Note: The NIRB was unable to find the most recent version of the Marine Shipping standard operating procedure.</p>
59	To report bird mortality.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The Proponent's <i>2023 Annual Report</i>, Appendix K (2023 Construction WMMPP report) notes that nine (9) bird mortalities were reported at the Project site in 2023. The Proponent has indicate these were all reported to the KIA and the GN, and three were reported to ECCC directly.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
60	To ensure that project aircraft maintain sufficient cruising altitudes to wildlife.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures described in the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. And in the <i>Back River Gold Mine Project Standard Operating Procedure: Fixed Wing and Helicopter Operations</i> (2018). The <i>2023 Construction Wildlife Mitigation and Monitoring Report</i> (NIRB Doc ID: 349928) notes that in 2023 all flights were in compliance with the WMMPP, no interactions between wildlife and helicopters were reported, and no additional mitigation was required.
61	To ensure aircraft are following minimum flying altitude and to maintain a daily flight log.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Minimum altitudes are indicated in the <i>Back River Project Standard Operating Procedure: Fixed Wing and Helicopter Operations</i> (July 2018). The <i>2023 Construction Wildlife Mitigation and Monitoring Program Report</i> (NIRB Doc ID: 349928), Appendix K to the <i>2023 Annual Report</i> includes a high-level summary of fixed-wing and helicopter flights in 2023. <p>Note: The GN requested the Proponent include additional details in future Annual Reports as well as an explanation of why pilots did not report any wildlife sightings in 2023.</p>

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
62	To maintain a marine monitoring program at the Marine Laydown Area.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • <i>Marine Monitoring Plan</i> (2018), NIRB Doc ID: 319642. • <i>2023 Marine Sampling Report</i> (NIRB Doc ID: 349366), Appendix L to the Proponent's 2023 <i>Annual Report</i>

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
63	To undertake a survey of seals prior to the construction of the winter airstrip and Winter Ice Road (WIR).	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Survey protocols described in the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. The <i>2023 Annual Report</i> notes that no survey occurred in 2023 as the WIR was constructed prior to February 15 (beginning of seal pupping period) and the winter airstrip was not constructed.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
64	To ensure shipping companies contracted have a ship-based marine mammal monitoring protocol.	Active In Compliance	Active Deficient – In Progress	<ul style="list-style-type: none"> Monitoring and mitigation described in the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933 and the <i>Back River Project Standard Operating Procedure: Marine Shipping Wildlife Mitigation and Monitoring</i> (2022) Standard operating procedure given to shipping companies prior to shipping season. Monitoring results provided from five (5) of nine (9) vessels servicing the Project in 2023. Results summarized in the <i>2023 Construction Wildlife Mitigation and Monitoring Program Report</i> (NIRB Doc ID: 349928), Appendix K to the <i>2023 Annual Report</i>. <p>Note: As numerous vessels failed to conduct ship-based marine mammal surveys in both 2022 and 2023, the NIRB encourages the Proponent to continue to remind vessel operators of the importance of marine mammal monitoring.</p> <p>Note: The NIRB was unable to find the most recent version of the Marine Shipping standard operating procedure and requests the Proponent provide a copy for the NIRB Public Registry.</p>

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
65	To ensure contracted shipping companies are aware of sensitive wildlife habitat and use appropriate protocols in case of a fuel accident.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • Response to oil spill is described in <i>The Oil Pollution Management Plan</i>, NIRB Doc ID: 319643 • All ships transporting fuel are required to have an approved <i>Shipboard Oil Pollution Emergency Plan</i>. It is also a requirement by the International Maritime Organization. • Sensitive marine habitats are illustrated in the <i>Back River Gold Mine Project Standard Operating Procedure: Marine Shipping Wildlife Mitigation and Monitoring</i> (2022). Shipping companies are provided with the standard operating procedure to ensure specific measures for protection of marine mammals are followed. • Mitigation measures are described in the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. <p>Note: The NIRB was unable to find the most recent version of the Marine Shipping standard operating procedure and requests the Proponent provide a copy for the NIRB Public Registry.</p>
66	The Proponent is encouraged to participate in the work of the Kitikmeot Socio-Economic Monitoring Committee (KSEMC).	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • B2Gold Nunavut is involved with the Kitikmeot Socio-Economic Monitoring Committee. While no meeting occurred in 2022 or 2023; a meeting was organized for early 2024. A monitoring

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				framework is described in the <i>Socio-Economic Monitoring Plan</i> (2024). NIRB Doc ID: 349367.
67	To develop Terms of Reference for the project-specific Socio-Economic Monitoring Working Group (SEMWG).	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The Terms of Reference were submitted to NIRB in 2018 and are included as Appendix A of the <i>Socio-Economic Monitoring Plan</i> (2024). NIRB Doc ID: 349367.
68	To develop a Project-specific Back River Socio-Economic Monitoring Program.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Socio-Economic Monitoring Plan</i> (2024), NIRB Doc ID: 349367.
69	To analyze potential risks of temporary mine closure.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects</i> (2018), NIRB Doc ID: 320331
70	To ensure Socio-Economic Management Plan and Socio-Economic Management Program address the risk and potential effects of temporary mine closure.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects</i> (2018), NIRB Doc ID:: 320331. <i>Socio-Economic Monitoring Plan</i> (2024), NIRB Doc ID: 349367. <i>Community Engagement Plan</i> (2024). NIRB Doc ID: 349368. <i>Human Resources Plan</i> (2022), NIRB Doc ID: 338510 <i>Inuit Business Development Plan</i> (2024 NIRB Doc ID: 349369.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
71	To submit staff schedule information.	Active In Compliance	Active In Compliance	Staff schedule for the 2024 construction period is included in the <i>Socio-Economic Monitoring Report</i> , NIRB Doc ID: 349358.
72	To provide the GN with register of Trades Workers	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Information on trades occupations, journeypersons and apprentices working at the Project is included in the <i>2023 Socio-Economic Monitoring Report</i>, NIRB Doc ID: 349358.
73	The Proponent is encouraged to work with training organization to ensure training opportunities.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> B2Gold Nunavut participated in multiple training-related discussions through various forums in 2023. <i>2023 Socio-Economic Monitoring Report</i>, NIRB Doc ID: 349358.
74	To maintain a referenced listing of formal certificates and licences that may be acquired on-site.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> List provided within the <i>2023 Socio-Economic Monitoring Report</i>, NIRB Doc ID: 349358.
75	To review education utilization rates for Project employees to identify whether employees are accessing opportunities available to them.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> A survey of Inuit Personnel was completed in 2022. The results were discussed with the Socio-Economic Monitoring Working Group in June 2022 by videoconference. B2Gold Nunavut is planning an updated Inuit Personnel Survey in 2024. The NIRB looks forward to seeing results of this in next year's Annual Report.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
76	The Proponent is encouraged to provide second language training.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> B2Gold Nunavut will provide support to employees interested in formally learning a second language. To date no training has been requested. Detail on the training program and request process is available within the <i>Human Resources Plan</i> (2022), Appendix I of the <i>2021 Annual Report</i>, NIRB Doc ID: 338510. Other measures to reduce potential language barriers include posting of site signage in English and in Inuinnaqtun/Inuktitut. <p>Note: The NIRB requests confirmation that employees are being made aware of the opportunity for second language training.</p>
77	To monitor demographic changes affecting the Kitikmeot communities.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Information on population demographics available in the <i>2023 Socio-Economic Monitoring Report</i>, NIRB Doc ID: 349358.
78	To ensure Inuit Qaujimajatuqangit and Traditional Knowledge are incorporated into monitoring plans.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> B2Gold Nunavut has developed the document <i>Guidance for Incorporating Community Perspectives and Traditional Knowledge in the Back River Project's Monitoring Programs</i>. This document is presented in the <i>Socio-Economic Monitoring Plan</i> (2022), NIRB Doc ID: 338510.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				<ul style="list-style-type: none"> Individual monitoring plans provide additional details (e.g., the <i>Wildlife Management and Monitoring Program Plan</i> (WMMPP) and the <i>Aquatic Effect Monitoring Plan</i> (AEMP)). Community feedback is presented in the Proponent's Annual Reporting to the NIRB.
79	To establish an Inuit Environmental Advisory Committee (IEAC).	Not Yet Active Not Yet Applicable	Active In Compliance	<ul style="list-style-type: none"> The IEAC held its inaugural meeting and a Project site visit in July 2023. Details provided in the <i>2023 Socio-Economic Monitoring Report</i>, NIRB Doc ID: 349358. <p>Note: During the NIRB's assessment of the Back River Project Energy Centre Proposal, the Board heard concerns that local communities and especially regional HTOs were not sufficiently communicated with / engaged with. The Board looks forward to seeing the Proponent's <i>2024 Annual Report</i> with details of how information from the IEAC, CTAG, HTOs and local communities is being incorporated in the Project's plans and programs, per Project Certificate 007 Amendment No. 01.</p>
80	To assess potential impacts of winter ice road usage on caribou harvesting.	Active In Compliance	Active In Compliance	The Proponent's <i>2023 Annual Report</i> indicates that no public use of the WIR was observed in 2023 and communications were shared with local

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				communities that the WIR is not a public road open for public use.
81	To consult with outfitting and guiding businesses in the area to assess and monitor potential Project effects on non-traditional activities. Activity Use	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The <i>Outfitting/Guiding Business Consultation Protocol</i> is included as the Appendix D within the <i>Socio-Economic Monitoring Plan</i> (2022), NIRB Doc ID: 338510. The Proponent issued a biennial letter to outfitting companies in the region in 2022 and held further discussions with one company. Letter is presented as Appendix G of the 2022 <i>Socio-Economic Monitoring Report</i>, Appendix H of the 2022 <i>Annual Report</i>, NIRB Doc ID: 343957 Another letter will be issued in 2024.
82	To assess archaeological and heritage resources.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The Proponent has a Cultural and Heritage Resources Protection plan in place. <p>Note: The Proponent is requested to provide a copy of this to the NIRB to upload on the Public Registry.</p> <ul style="list-style-type: none"> An archaeological permit was not sought/was not needed for 2023 as there were no new additions to the Project footprint being proposed. Several known archaeological sites were revisited in 2023 near quarry sites; 2 were

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				undisturbed while 1 site had been disturbed by quarrying activities; an incident report was submitted with the GN.
83	To assess and support employee access to housing.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> As described in the <i>Inuit Human Resources Plan</i> (NIRB Doc ID: 338510), B2Gold Nunavut will provide financial management orientation to employees upon request). An Inuit Employee Assistance Program (IEAP) was launched by B2Gold Nunavut in 2023 that includes a financial literacy training component. B2Gold Nunavut's Employee and Family Assistance Program (EFAP) also offers free and confidential financial guidance on several topics (e.g. debt management, bankruptcy, retirement).
84	To assess and monitor project-induced effects on regional housing.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Data was collected from the 2022 Inuit Personnel Survey. This topic was discussed with the SEMWG in June 2022. The survey is presented in the <i>Human Resources Plan (2022)</i>, Appendix I of the <i>2021 Annual Report</i>, NIRB ID No: 338510. Results are summarized in the <i>2023 Socio-Economic Monitoring Report</i>, NIRB Doc ID: 349358.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				<ul style="list-style-type: none"> B2Gold Nunavut anticipates conducting an updated Inuit Personnel Survey in the second half of 2024.
85	To establish a cross-cultural awareness training.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> In 2023, 27 cross-cultural training sessions were delivered. Results are provided in the <i>2023 Socio-Economic Monitoring Report</i>, NIRB Doc ID: 349358. The cross-cultural orientation is described in the <i>Human Resources Plan (2022)</i>, Appendix I of the <i>2021 Annual Report</i> NIRB Doc ID: 338510.
86	To monitor and mitigate for airborne actinolite fibers.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> No airborne actinolite fibres have been identified. B2Gold Nunavut will continue ongoing monitoring.
87	To have in place a site orientation plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> A Site Orientation Program is in place for all site personnel. The orientation is updated on an as-needed basis.
88	To include consideration for worker safety in its winter ice road (WIR) operations.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Consideration on safety is included within the <i>Road Management Plan (2021)</i>, Appendix E to the 2020 Annual Report, NIRB Doc ID: 334442. In 2023 B2Gold Nunavut was constructing emergency shelter camps along the WIR.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
89	To include prevention measures for fuel spills into the marine environment and mitigating potential effects of an accidental spill.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Spill management with key contact information of communities are included within the <i>Wildlife Mitigation and Monitoring Program Plan</i> (2024), NIRB Doc IDs: 351932 & 351933. <i>Oil Pollution Emergency Plan</i> (2023), Appendix I to the <i>2022 Annual Report</i>, NIRB Doc ID: 343957. <i>Spill Contingency Plan</i> (2015), NIRB Doc ID: 280283. <p>Note: ECCC has recommended the Spill Contingency plan be updated with a current account of hazardous substances stored at the Project.</p>
90	To maintain an Oil Pollution Emergency Plan (OPEP).	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Oil Pollution Emergency Plan</i> (2023), Appendix I to the <i>2022 Annual Report</i>, NIRB Doc ID: 343957.
91	To contract certified vessels for shipping and ensure awareness of the requirements.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Shipping Management Plan</i> (2018), NIRB Doc ID: 319686. <i>Oil Pollution Emergency Plan</i> (2023), Appendix I to the <i>2022 Annual Report</i>, NIRB Doc ID: 343957. <i>Risk Management and Emergency Response Plan</i> (2018), NIRB Doc ID: 319645. All plans are provided to the shippers to ensure awareness.

T&C*	Requirement	Compliance Achievement 2022-2023	Compliance Achievement 2023-2024	NIRB Comment
Project Specific Terms and Conditions				
				Note: Transport Canada has requested the Proponent provide an updated Shipping Management Plan that reflects the new <i>Ballast Water Regulations</i> (2021). TC also pointed the Proponent to recent guidelines for the management of biofouling.
92	To ensure availability of spill response equipment.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The plan lists spill response equipment and training to conduct, <i>Oil Pollution Emergency Plan</i> (2023), Appendix I to the <i>2022 Annual Report</i>, NIRB Doc ID: 343957.
93	To submit a post-construction depiction of the MLA.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> No in-water construction occurred in the marine environment in 2023.
94	To ensure fuel trucks meet industry design standards.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> B2Gold Nunavut ensures that all fuel trucks meet industry standards and monthly maintenance and inspections are conducted. Maintenance summary not provided in <i>2023 Annual Report</i> due to transition to new data management software system; the Board looks forward to seeing the Proponent's summary in next year's Annual Report.

* For the specific wording of a term and condition, please refer to the Back River Gold Mine Project Certificate No. 007.