



NIRB File No.: 12MN036
NIRB Registry Link: www.nirb.ca/project/125740
NWB File No.: 2BC-BRP1819 and 2AM-BRP1831

May 21, 2025

To: Back River Project Distribution List

Sent via email

Re: Comment Request for B2Gold Corporation's Back River Project 2024 Annual Report

Dear Parties:

The Nunavut Impact Review Board (NIRB or Board) received the *2024 Annual Report* required by Project Certificate No. 007, Amendment (NIRB File No. 12MN036) which is now available for review from the NIRB's public registry at www.nirb.ca/project/125740. [Appendix A](#) of this letter provides a list of documents.

Effects monitoring

As required by legislation¹ and the Project Certificate, the NIRB's monitoring program focuses on compliance and effects monitoring including information from Parties and Responsible Authorities. By copy of this letter, the NIRB is providing parties the opportunity to review the Annual Report and submit comments to the NIRB by **June 23, 2025**, on:

- a. Whether the conclusions reached by B2Gold in the *2024 Annual Report* are valid; and
- b. Any areas of significance requiring further supporting information or any changes to the monitoring program which may be required.

An example format for comments is included in [Appendix B](#) of this letter.

Compliance monitoring

Regulatory Authorities, including the Kitikmeot Inuit Association, are also required to provide a compliance update on the following:

- a. Provide a summary of any compliance monitoring and/or site inspections undertaken in association with the Project, including specifically;
 - i. Identify the terms and conditions from the Project Certificate which have been incorporated into any permits, certificates, licenses, or other approvals issued for the Project, where applicable, and report annually to the NIRB on the status of those incorporated terms and conditions;

¹ Sections 12.7.3 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)*, s. 135(4) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (NuPPAA)

- ii. A summary of any inspections conducted during the 2024 reporting period, and the results of these inspections; and
- iii. A summary of B2Gold's compliance status with regard to authorizations that have been issued for the Project.

This information is important to assist the NIRB assess, coordinate, integrate, and ensure that the Board has the information to accurately measure effects, adequately assess compliance with terms and conditions, regulatory instruments, and agreements, and whether the Projects are carried out in accordance with the terms and conditions as set out in the project certificate.

Please send all forthcoming submissions directly to the NIRB via email at info@nirb.ca.

Questions regarding the NIRB's monitoring process can be directed to the undersigned at kmorrison@nirb.ca; and inquiries related to the Back River Project can be directed to the NIRB's Monitoring Officer, Varun Nayak, vnayak@nirb.ca.

Sincerely,



Keith Morrison
Manager, Project Monitoring
Nunavut Impact Review Board

cc: Merle Keefe, B2Gold
Kristina Benoit, B2Gold

Attachment (2): Appendix A: NIRB Public Registry Document ID Numbers
Appendix B: Example Table for Comments on Annual Report

APPENDIX A: NIRB DOCUMENT ID NUMBERS

The *2024 Annual Report* and supplemental documents for the Back River Project are available on the NIRB's public registry at www.nirb.ca/project/125740. Documents can be accessed by:

- Selecting the “Documents Tab” of the Project Dashboard(s) then select the “Annual Report” category on the left pane;
- Selecting “Recent Documents” on the Project Dashboards; or
- Searching the Public Registry with the Document ID numbers

Summary of documents submitted:

Document	Document ID
250409-12MN036-2024 Annual-Report	355350
250409-12MN036-2024 Annual-Report-App A Figure 1	355334
250409-12MN036-2024 Annual-Report-App B SEMR	355335
250409-12MN036-2024 Annual-Report App C WMMP-Pt 1	355336
250409-12MN036-2024 Annual-Report App C WMMP-Pt 2	355337
250409-12MN036-2024 Annual-Report App C WMMP-Pt 3	355338
250409-12MN036-2024 Annual-Report App C WMMP-Pt 4	355339
250409-12MN036-2024 Annual-Report App C WMMP-Pt 5	355340
250409-12MN036-2024 Annual-Report App C WMMP-Pt 6	355341
250409-12MN036-2024 Annual-Report App C WMMP-Pt 7	355342
250409-12MN036-2024 Annual-Report-App D Water Mgmt Plan	355343
250409-12MN036-2024 Annual-Report-App E SWQ Baseline	355344
250409-12MN036-2024 Annual-Report-App F Construction Summary Rpt	355345
250409-12MN036-2024 Annual-Report-App G Rascal Stream Field Summary	355346
250409-12MN036-2024 Annual-Report-App H Vegetation Monitoring Program Rpt	355347
250409-12MN036-2024 Annual-Report-App I Shipment Equipment Cleaning Logs	355348
250409-12MN036-2024 Annual-Report-App J Marine Sampling Rpt	355349

APPENDIX B: EXAMPLE TABLE FOR COMMENTS ON THE ANNUAL REPORT

Comment Number:	
Subject/Topic:	
References:	To the appropriate section in the Annual Report and/or Addendum
Comment:	<ol style="list-style-type: none"> 1. Gap/Issue 2. Disagreement with the Annual Report conclusion 3. Reasons for disagreement with the Annual Report conclusion 4. Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix
Conclusion/Request:	