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June 23, 2025

NIRB File #: 12MN036

Sent VIA Email: info@nirb.ca

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

Hello Keith,

The Government of Nunavut (GN) thanks the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on the 2024 Annual Report for B2Gold Corporation's Back River Project, NIRB File #: 12MN036.

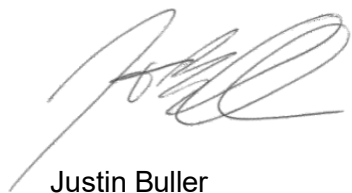
The GN has reviewed the 2024 Annual Report and related documents and has four (4) comments, attached to this letter, to raise with the Board at this time. These comments are primarily concerned with missing information related to mitigation and monitoring programs, and inconsistency in their implementation.

Based on its Wildlife Mitigation and Monitoring Program Plan (WMMPP) B2 Gold is required to conduct pre-blast wildlife surveys and weekly surveys to reduce wildlife attractants (waste management & infrastructure exclusions). The GN notes that these surveys have not been completed consistently, and related information appears to be missing. The GN also notes that information related to helicopter flight logs and winter ice road traffic volume, as well as the accompanying mitigation measures, has not been reported as expected.

Noting the combination of an atypically short review period with the concurrent review of 4 other annual reports, the GN may have a subsequent submission related to this Annual Report. The GN recognizes that any supplementary comments would not be addressed in the context of revisions to this Annual Report. However, we would hope the Proponent would take steps to address any additional comments over the next year and provide an update on progress made in the 2025 Annual Report.

The GN appreciates participating in ongoing project monitoring through the NIRB process. Should there be any concerns or need for follow-up, please feel free to contact me at jbuller@gov.nu.ca.

Thank you,



Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

GN AR # 01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Blasting Activities and Wildlife Protection
Terms and Conditions	41, 43, 44 (Project Certificate No. 007, Amendment No.1)
References	<ul style="list-style-type: none"> • B2Gold Nunavut. Back River Project 2023 Annual Report: Comment Response (August 2024) • B2Gold Nunavut. Back River Project 2024 Wildlife Mitigation and Monitoring Program Report. Part 1 (March 2025) • B2Gold Nunavut. Back River Mine Wildlife Mitigation and Monitoring Program Plan, Version 13 (October 2024) • Government of Nunavut. Government of Nunavut Comments on 2023 Annual Report for B2Gold Corporation's Back River Project (July 2024)
IDENTIFICATION OF ISSUE	
<p>The GN remains concerned about the Proponent's repeated failure to consistently conduct and report pre-blast surveys in 2024. These concerns mirror those raised by the GN during the 2023 annual reporting period.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>Section 7.2.2.8 of the Wildlife Mitigation and Monitoring Program Plan (WMMP) and section 2.5.1 of the 2024 Wildlife Mitigation and Monitoring Program Report (WMMPR), describe the Proponent's requirement to conduct pre-blast surveys to reduce the risk of disturbance, injury, or death of caribou (or other wildlife).</p> <p>However, the 2024 WMMPR states that "...of the 119 days when blasting occurred at the Goose site, there were 14 days where pre-blasting surveys were not documented for locations where blasting occurred at Goose..." (B2Gold Nunavut, 2025, p. 41) (88% of blasts had pre-blasting surveys). Additionally, the 2024 WMMPR states that "...of the 19 days when blasting occurred at the [Marine Laydown Area (MLA)], there were 13 days where pre-blasting surveys were not documented." (B2Gold Nunavut, 2025, p.41).</p>	

The GN notes that, based on this information, pre-blast surveys were undocumented for 11% of blasting days at the Goose site and 68% at the MLA site. Cumulatively, this represents 27 days or 19% of all blasting days.

The GN recognizes that the 2024 WMMPR reflects a slight improvement over the 2023 WMMPR, which lacked documentation for approximately 32% of blasting days (GN AR# 05: Blasting Activities – Wildlife Protection; GN, 2024). However, the GN remains concerned by the recurrence of similar issues to 2023 and the lack of follow-up on Proponent commitments made in 2024.

For example, the Proponent fails to explain why pre-blast survey documentation is missing. Instead, the Proponent states that “...the missing documentation of these surveys does not confirm that they were not completed, as site personnel are required to incidentally report sightings of wildlife, particularly during blasting...” (B2Gold Nunavut, 2025, p. 41).

The GN recognizes the value of incidental wildlife sightings by site personnel, however, these are not systematic and do not replace pre-blast surveys required under the WMMP.

The GN acknowledges that physical records may occasionally be misplaced, resulting in documentation gaps. In response to the GN’s comments on the 2023 WMMPR, the Proponent indicated that it was working to reduce the risk of lost records by “...converting the paper datasheet to a virtual site form to ensure that after completion, forms are digitally documented and stored to reduce the possibility of forms being misplaced and not submitted...” (B2Gold Nunavut, 2024, p. 48). However, the Proponent does not provide an update on the status of this initiative in the 2024 WMMPR.

To address the lack of pre-blast survey documentation, the Proponent states, “...during the 20 days where blasting occurred but no data sheets were completed, caribou locations using collar data were investigated further. During all 20 of the days, the closest caribou collar point was approximately 5 km away from Goose and 50 km from the MLA.” (B2Gold Nunavut, 2025, p. 43). The GN appreciates this information, however, this information does not replace pre-blast surveys required under the WMMP. The GN believes transparency would be improved if the Proponent included figures showing collar locations and the blast locations for the days lacking pre-blast survey documentation.

REQUEST(S)/RECOMMENDATION(S)

The GN requests the Proponent take the following actions:

1. Explain why pre-blast survey documentation is missing for 27 days in 2024.
2. Provide a status update on the implementation of digital datasheets used for pre-blast surveys.

The GN recommends the Proponent submit maps showing caribou collar locations and blast locations for each day for which pre-blast survey documentation is missing.

GN AR # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Attraction
Terms and Conditions	48 (Project Certificate No. 007, Amendment No.1)
References	<ul style="list-style-type: none"> • B2Gold Nunavut. Back River Project 2024 Wildlife Mitigation and Monitoring Report. Part 1 (March 2025) • B2Gold Nunavut. Back River Mine Wildlife Mitigation and Monitoring Program Plan, Version 13 (October 2024)
IDENTIFICATION OF ISSUE	
<p>The Proponent is required to reduce wildlife attraction to the Project infrastructure (particularly grizzly bears and wolverine/furbearers) through effective waste management and the use of exclusionary infrastructure designs such as fences and building skirting. However, the GN is concerned that the Proponent has not conducted monitoring at the frequencies necessary to support this objective. Regular monitoring is required to ensure mitigations can be implemented in a timely manner to reduce human-wildlife encounters.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>Section 9.3.1.4 of the WMMP states that the Proponent will monitor waste disposal facilities weekly (B2Gold Nunavut, 2024, p. 119), while section 9.3.1.3 specifies that the Proponent will monitor skirting and fencing monthly (B2Gold Nunavut, 2024, p. 118). In the 2024 WMMPR, the Proponent reports that they conducted monitoring (building and skirting inspections done in conjunction with waste management inspections) for 37 weeks in 2024 (B2Gold Nunavut, 2025, p. 49). The Proponent summarized these monitoring efforts in Figure 2.6-1 (B2Gold Nunavut, 2025, p. 49).</p> <p>However, based on its review of the 2024 WMMPR, the GN is concerned that the Proponent did not conduct monitoring at the required frequencies (i.e., on a weekly basis).</p> <p>For example, the GN notes that Figure 2.6-1 indicates that the Proponent did not conduct any inspections at the Goose site in September 2024 or at the MLA site from January through August 2024.</p>	

The GN notes that in Figure 2.6-1 only two weekly inspections were conducted at the Goose site during January and August 2024. Additionally, the GN notes that Figure 2.6-1 illustrates that only one inspection was conducted at the MLA site in each of the months from September through November 2024.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent explain the failure to conduct waste management and skirting/fencing monitoring on a weekly basis, as required by the Proponent's WMMP.

GN AR # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Protection and Presentation of Helicopter Flight Data
Terms and Conditions	60 (Project Certificate No. 007, Amendment No.1)
References	<ul style="list-style-type: none"> • B2Gold Nunavut. Back River Project 2024 Wildlife Mitigation and Monitoring Report (March 2025) • B2Gold Nunavut. Back River Mine Wildlife Mitigation and Monitoring Program Plan, Version 13 (October 2024) • B2Gold Nunavut. Back River Project 2023 Wildlife Mitigation and Monitoring Report (March 2024) • Government of Nunavut. Government of Nunavut Comments on 2023 Annual Report for B2Gold Corporation's Back River Project (July 2024)
IDENTIFICATION OF ISSUE	
<p>The GN acknowledges that the Proponent uses various mitigation measures to reduce disturbance to caribou and other wildlife from helicopter activities, as outlined in the WMMP (e.g., Section 7.2.2.7).</p> <p>In response to the 2023 Annual Report, the GN submitted a comment on this topic (GN AR #04 – Aircraft – Wildlife Protection; GN, 2024). In the 2024 WMMPR, the Proponent has partially addressed the GN's comment by detailing wildlife observations made by pilots/passengers or reported to flight operations and by clarifying when in the year the Project uses helicopters.</p> <p>However, the GN notes that the Proponent did not provide the previously requested figures showing flight paths or tables summarizing flight activity.</p> <p>This information is necessary to ensure the GN can monitor the Proponent's compliance with the WMMP and Project Certificate.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>In Section 2.4.3 of the 2024 WMMPR, the Proponent has partially responded to GN AR #04 – Aircraft – Wildlife Protection (GN, 2024) by providing additional information about the timing of</p>	

helicopter activities at the Project (Table 2.4-1; B2Gold Nunavut, 2025, p. 39). Additionally, the Proponent provided information regarding wildlife observations made during flights by pilots, passengers or reported to flight operations (B2Gold Nunavut, 2025, p. 39).

However, the GN notes that the Proponent did not provide the previously requested figures showing flight paths or tables summarizing flight activity. The GN also notes that unlike the 2023 WMMPR, which included Figure 2.4-1 Helicopter Flights, June to October 2023 (B2Gold Nunavut, 2024, p.33), the 2024 WMMPR does not appear to include any figures of flight paths.

The GN is concerned about the absence of key flight data, particularly given that helicopter activity overlaps with periods when caribou are likely to be present in the Project area (Table 3.10-3; B2Gold Nunavut, 2025, p. 27). Additionally, the 2024 WMMPR indicates that 90,031 km were flown in 2024 (B2Gold Nunavut, 2025, p. 39), which represents a significant (66%) increase compared to the 53,658.34 km reported in the previous year (B2Gold Nunavut, 2024, p. 32).

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent present helicopter figures using clear symbology to show details (where possible) such as individual flight legs, track lines colour-coded by flight height, and the location and group size of the wildlife observed in relation to the helicopter tracks.

The GN requests that the Proponent provide comprehensive tables of flight logs, including (where possible) the date, purpose, distance, average height above ground level (m), justification for flights below 610 m, wildlife observations, and any course corrections made in response.

GN AR # 04	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Traffic monitoring and caribou crossing
Terms and Conditions	37 (Project Certificate No. 007, Amendment No.1)
References	<ul style="list-style-type: none"> B2Gold Nunavut. Back River Project 2024 Wildlife Mitigation and Monitoring Report (March 2025)
IDENTIFICATION OF ISSUE	
<p>The GN acknowledges that the Proponent uses various mitigation measures to reduce disturbance or other impacts to caribou and other wildlife from the Winter Ice Road (WIR), as outlined in the WMMP (e.g., Section 7.2.3).</p> <p>The GN notes, however, that the 2024 WMMPR lacks clarity on how often the mitigation measures were applied in 2024.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>In the 2024 WMMPR, the Proponent states the following regarding compliance with the WMMP mitigation measures along the WIR, “Monitors observed excellent compliance with the mitigation measures, and multiple groups of caribou successfully crossing the WIR during pauses traffic (Photo 3.3-4). Therefore, no additional mitigation was required in 2024” (B2Gold Nunavut, 2024, p. 10).</p> <p>The GN notes that the information in 2024 WMMPR does not appear to support this conclusion. For example, sections 2.3.3.1 or 3.3.2.1 of the 2024 WMMPR do not provide information on when specific forms of mitigation as described in section 7.2.3 of the WMMP were implemented in 2024.</p> <p>The GN is particularly concerned by this lack of detail, given that the 2024 WMMPR indicates that the number of one-way trips made on the WIR in 2024 was 164% of the predicted number in the Final Environmental Impact Statement (FEIS). Specifically, 3,116 one-way trips were made on the WIR during 2024, while only 1,900 one-way trips were predicted per year in the FEIS (B2Gold Nunavut, 2025, p. 35).</p>	

REQUEST(S)/RECOMMENDATION(S)
<p>The GN requests that the Proponent improve how information on traffic activity and compliance with mitigation measures is presented. This could entail creating a table to provide information for each trip, such as wildlife observations and the mitigation measures implemented.</p>