



2025 Annual Monitoring Report

BACK RIVER PROJECT

File No. 12MN036

Project Certificate 007

Abstract

Annual monitoring report of the Back River Project (gold mine) for 2024-2025 reporting year.

Project Location: Kitikmeot Region, Nunavut

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

Monitoring Period: October 2024 – September 2025

Date Issued:

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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
GN-DoE	Government of Nunavut – Department of Environment
GN-DCH	Government of Nunavut – Department of Culture and Heritage
GN-NHC	Government of Nunavut – Nunavut Housing Corporation
GNWT	Government of the Northwest Territories
HC	Health Canada
IEAC	Inuit Environmental Advisory Committee
IIBA	Inuit Impact and Benefits Agreement
KIA	Kitikmeot Inuit Association
KSMEC	Kitikmeot Socio-economic Monitoring Committee
NIRB or Board	Nunavut Impact Review Board
NRCan	Natural Resources Canada
NWB	Nunavut Water Board
MLA	Marine Laydown Area
SEMR	Socio-Economic Monitoring Report
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, 2024 to September 30, 2025.

1.1. Project Overview

1.1.1. 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 1).

The Project includes the Goose Property and the Marine Laydown Area (MLA) located at Bathurst Inlet, approximately 130 km northwest of the Goose Property, with a Winter Ice Road (WIR) connecting these two (2) main developments.

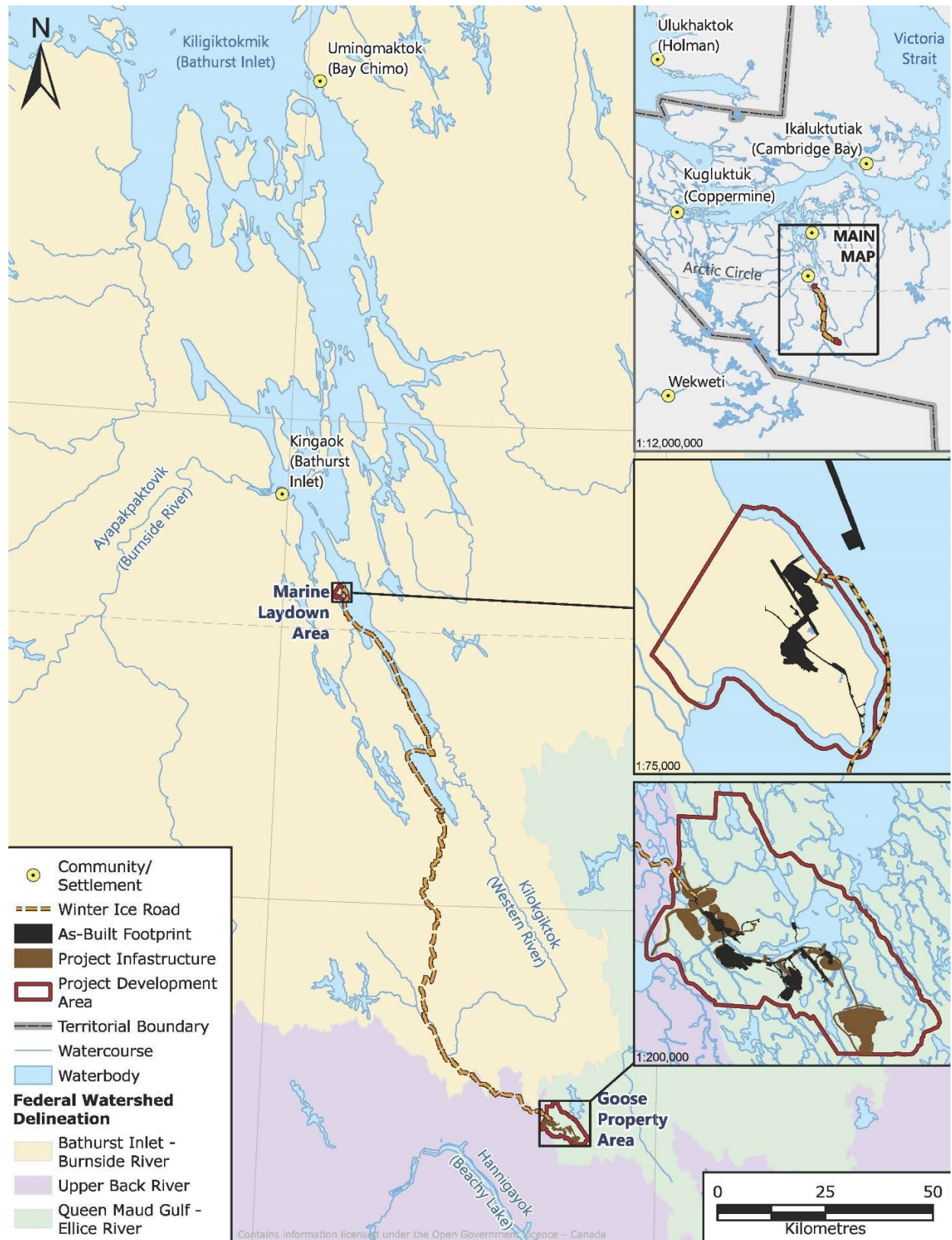


Figure 1 Back River Project Area Map (from B2Gold 2024 Annual Report)

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.

Details on the project activities can be found at www.nirb.ca/project/124149 (original Back River Project, Project Certificate 007) and www.nirb.ca/project/125740 (Back River Project Energy Centre, Project Certificate 007 Amendment 1).

1.1.2. Project History

Table 1 Project History

Date	Achievement/Comment
December 2017	The NIRB issued Project Certificate No. 007
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) and Goose site.
November 2019	Type "A" Water License (2AM-BRP1831) issued
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	Amendment of Type "A" Water 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.
September 2025	Official opening of the Goose Mine

1.1.3. 2024-2025 Project Activity Updates

Updates to the project since the 2024 Monitoring Report (available in the NIRB online registry at www.nirb.ca/project/125740 or by searching for document 353174) are summarized as follows:

- Continued construction and operation of the Goose property facilities (mill, shops and associated infrastructure).
- Echo Pit mined out, currently being used for tailings storage.
- Umwelt Pit stripping and operations started.
- Vault Underground decline advanced.
- First gold pour and start of production.
- Official opening.
- Dewatering of Llama Lake begun.

2. Monitoring

2.1. 2023-2024 Board Recommendations

On February 10, 2025, the NIRB issued the following recommendations in the *2023-2024 Annual Monitoring Report for the Back River Project*¹:

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.

On February 18, 2025, B2 Gold submitted the updated Vegetation Monitoring Plan and on March 4, 2025, an updated Noise Abatement Plan, satisfying the recommendation.

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.

¹ Doc ID 353174

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.

In its 2024 Annual Report (Doc ID. 355350), B2Gold reported that in late 2024 a new water treatment system designed for hydrocarbon removal was implemented, satisfying the recommendation.

2.2. Proponent Annual Report

On April 9, 2025, B2Gold submitted the *Back River Project 2024 Annual Report* and associated appendices which can be found at www.nirb.ca/project/125740 or by searching for the following Document IDs:

Table 2: B2Gold 2024 Annual Report Documents

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
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

2.3. Monitoring by Regulatory Authorities

2.3.1. Comments on 2024 Annual Report

On May 21, 2025, the NIRB requested that Regulatory Authorities with jurisdiction and/or area of expertise for the Back River Project review the Proponent's 2024 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 2024 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 *2024 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 28, 2025, is shown in Table 3.

Table 3 Parties' Comments on the 2024 Annual Report

Commenting Party	Document ID
Kitikmeot Inuit Association (KIA)	356262
Government of Nunavut (GN)	356263
Health Canada (HC)	356259
Transport Canada (TC)	356261
Environment and Climate Change Canada (ECCC)	356260
Fisheries and Oceans Canada (DFO)	356872
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)	356873

2.3.2. Proponent's Response

On July 7, 2025 B2Gold was given the opportunity to respond to the comments. The documents making up the response are shown in Table 4.

Table 4 B2Gold Response to Comments

Document	Document ID
Response to Comments re 2024 Annual Report	357006
Appendix A Fish Passage EMM for Rascal Stream	357007
Appendix B Supplementary Hydrology and Fish Habitat	357008
Appendix C Rascal Stream West Arctic Grayling Monitoring Report	357005
Response to DFO and CIRNAC comments	357581

3. NIRB Monitoring

3.1. Compliance with the Project Certificate

The NIRB's comprehensive assessment of the Project Certificate terms and conditions is provided in Table 5 and Commitments in Table 6. During the 2024-2025 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.



In Table 5, cells with a gray background () indicate terms and conditions not yet applicable. Cells with a yellow background () indicate terms and conditions that are deficient or require attention.

Table 5 Compliance with Terms and Conditions

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
Air Quality					
1. Have an Air Quality Monitoring and Management Plan in place.	<i>Air Quality Monitoring and Management Plan (2019)</i> (NIRB Doc ID: 329195)	In Compliance	In Compliance		B2Gold has an Air Quality Monitoring and Management Plan (AQMMP) in place and plans to submit a revised version in Q4 2025 to clarify site classifications (near field, far field, reference) and their rationale, addressing KIA’s recommendation.
2. Demonstrate that air quality emissions remain within predicted levels.	<i>Air Quality Monitoring and Management Plan (2019)</i> (NIRB Doc ID: 329195)	Deficient – In Progress	Deficient – In Progress		B2Gold continues air quality monitoring at Goose, with higher NO ₂ and dustfall levels in 2024 linked to increased construction. Continuous particulate matter (PM) and NO ₂ monitoring equipment was installed in December 2024, and data will be included in the 2025 Annual Report.
3. Have a Dust Management and Monitoring Plan in place.	<i>Air Quality Monitoring and Management Plan (2019)</i> (NIRB Doc ID: 329195)	In Compliance	In Compliance		The AQMMP includes a Fugitive Dust Reduction Plan (FDRP). Proposed updates to the FDRP and AQMMP are planned for 2025. NIRB staff noted during the 2025 site visit that there was dust generated by vehicle traffic on the road between the mined and airstrip/Goose Exploration Camp which may require additional dust monitoring stations.
4. Have an Incineration Management Plan in place.	<i>Incineration Management Plan (2020)</i> (NIRB Doc ID: 329196)	In Compliance	In Compliance		B2Gold has an Incineration Management Plan (IMP) in place.
5. Provide the results of stack testing conducted on incinerators.	<i>Incineration Management Plan (2020)</i> (NIRB Doc ID: 329196)	Not Yet Applicable	Not Yet Applicable		B2Gold will conduct incinerator stack testing in 2025, with results in the annual report. Additional

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
					testing is planned for 2026 after new incinerators are installed.
Climate and Meteorology					
6. Maintain a Greenhouse Gas (GHG) Reduction Plan.	<i>Air Quality Monitoring and Management Plan (2019)</i> (NIRB Doc ID: 329195)	In Compliance	In Compliance		B2Gold maintains a GHG Reduction Plan within the AQMMP. GHG emissions increased in 2024 due to higher diesel use during construction.
7. Maintain a Mine Closure and Reclamation Plan.	<i>Interim Closure and Reclamation Plan (2021)</i> (NIRB Doc ID: 337487)	In Compliance	In Compliance		B2Gold maintains an approved Interim Closure and Reclamation Plan (ICRP), last updated in 2021 and revised in 2022/23 to reflect project modifications.
8. Provide a summary of meteorological conditions experienced within the project.	<i>Air Quality Monitoring and Management Plan (2019)</i> (NIRB Doc ID: 329195)	In Compliance	In Compliance		B2Gold continues meteorological monitoring at Goose, with 97% data recovery in 2024. The <i>2024 Annual Report</i> includes temperature, wind, and precipitation data, with comparisons to long-term climate normals. Freeze-thaw cycles, extreme weather events, and monthly wind rose charts will be added in future reports, as recommended by KIA.
Noise and Vibration					
9. Demonstrate consideration for noise reduction measures when siting and constructing the project and to demonstrate that noise level remains with reasonable limits.	<i>Noise Abatement Plan (Version 2, 2025)</i> (NIRB Doc ID: 355415)	Deficient – In Progress	Deficient – In Progress		Noise Abatement Plan was submitted in the <i>2024 Annual Report</i> . B2Gold began noise monitoring in September 2024, but the data was not included in the <i>2024 Annual Report</i> . In response to KIA's request, B2Gold confirmed the data will be provided in the 2025 report. NIRB looks forward to seeing results, including comparisons to FEIS predictions and applicable standards.
10. Demonstrate consideration for noise to be further mitigated during project activities.	<i>Noise Abatement Plan (Version 2, 2025)</i> (NIRB Doc ID: 355415)	Deficient – In Progress	Deficient – In Progress		While data collection is ongoing, trends have not yet been identified. Engineering and administrative controls are in place to reduce noise exposure, and

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
					additional sampling will continue in 2025. In response to KIA's request, B2Gold confirmed the Wildlife Mitigation and Monitoring Plan (WMMP) will be referenced in future reports to address noise impacts on wildlife. See <i>T&C no. 9</i>
Terrestrial Environment					
11. Conduct permafrost mapping to inform detailed design and plan for changing permafrost conditions.	<i>Draft Thermal Monitoring Plan</i> (NIRB Doc ID: 349359)	Deficient – In Progress	Deficient – In Progress		B2Gold Nunavut has developed a site-specific Thermal Monitoring Plan with SRK Consulting, which includes permafrost mapping and monitoring of ground temperature, seasonal thaw depth, and ground ice. While a draft plan was submitted for internal review, CIRNAC noted that the <i>2024 Annual Report</i> lacked comparison to background data and FEIS predictions, and did not include the updated plan. B2Gold commits to providing the updated Thermal Monitoring Plan and comparative data in the 2025 Annual Report, including re-established historic sites and new monitoring locations. NIRB looks forward to receiving the updated plan and data in the 2025 Annual Report.
12. Monitor and mitigate effects of the project on the permafrost.	<i>Draft Thermal Monitoring Plan</i> (NIRB Doc ID: 349359)	Deficient – In Progress	Deficient – In Progress		B2Gold Nunavut has developed a draft Thermal Monitoring Plan with SRK Consulting, covering infrastructure such as roads, pads, and quarries. CIRNAC has repeatedly flagged ponding and thin fill areas as risks to permafrost integrity since 2022. The <i>2024 Annual Report</i> includes a summary memo and notes planned instrumentation upgrades, but lacks detailed mapping and timelines for remediation.

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
					B2Gold has begun adding fill to some road sections and plans to continue this work in 2025, with further monitoring and reporting. NIRB looks forward to receiving updated mapping, timelines, and mitigation actions in the 2025 Annual Report.
13. Undertake additional geotechnical investigations as needed to identify and mitigate project impacts on sensitive landforms.	<i>2024 Annual Geotechnical Inspection Report, submitted to Nunavut Water Board</i>	Deficient – In Progress	Deficient – In Progress		CIRNAC noted that summaries of investigations from 2023 and 2024 were not included in the <i>2024 Annual Report</i> , nor was it clear whether sensitive landforms were identified or addressed. B2Gold has committed to providing this information in the 2025 Annual Report and confirmed that relevant data is also submitted through NWB-required reports. NIRB recommends including a full summary of recent geotechnical work, identification of sensitive landforms, and related mitigation and monitoring measures in the 2025 Annual Report.
14. Provide a Waste Management Plan.	<i>Landfill and Waste Management Plan (2017) (NIRB Doc ID: 337488)</i>	In Compliance	In Compliance		B2Gold continues to implement the Landfill and Waste Management Plan (2017). A revised plan was submitted to the NWB on March 31, 2025, and will be provided to NIRB once approved.
15. Have a Progressive Reclamation Plan in place.	<i>Interim Closure and Reclamation Plan (2021) (NIRB Doc ID: 337487)</i>	In Compliance	In Compliance		B2Gold continues to implement the updated Progressive Reclamation Plan. No progressive reclamation activities have been undertaken to date, as no mining areas have been deemed ready for reclamation.
Geological Features, Surficial and Bedrock Geology, and Geochemistry					
16. Develop site-specific quarry operation and management plans.	<i>Back River Project Quarry Management Plan (2020) (NIRB Doc ID: 337486)</i>			KIA	B2Gold continues to implement the Quarry Management Plan (QMP). Site-specific quarry

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
		In Compliance	In Compliance		operation and management plans are developed in advance of any quarry or borrow pit use. No new sites were accessed in 2024.
17. Conduct tests of the tailings and treatment sludges and to evaluate the potential for remobilization of arsenic.	<i>Tailings Management Plan (2020) (Appendix K, 2021 Annual Report, NIRB Doc ID: 338510)</i>	Not Yet Applicable	Not Yet Applicable		An updated Tailings Management Plan (TMP) was submitted to NWB in April 2022 and will be provided to NIRB once approved. No tailings were deposited in 2024. Tailings started being deposited into the Echo Pit in 2025. Reporting is expected beginning in 2025.
18. Undertake an infill Geotechnical Characterization Program.		In Compliance	In Compliance		B2Gold continues to implement the infill geotechnical characterization program initiated in 2018, with further drilling conducted in 2021. B2Gold’s currently approved mine plan no longer contains a TSF structure and its associated dam. Additional drilling will occur if the TSF dam is to be constructed.
Hydrological Features and Hydrology					
19. Maintain a Saline Water Management Plan.	<i>Water Management Plan (Version 5, 2024) (Appendix D, 2024 Annual Report; NIRB Doc ID: 355343)</i> <i>Water Management Plan (2020) (NIRB Doc ID: 337485)</i>	In Compliance	In Compliance	NWB	B2Gold continues to implement the Saline Water Management Plan provided as Appendix B of the Water Management Plan (WMP). Although the plan was last updated in 2022 and included in that version of the WMP, it was not carried forward into the 2024 WMP. NIRB requests that it be included in the latest version to ensure accessibility for regulators and the public.
20. Develop a Thermal Monitoring Plan.	<i>Draft Thermal Monitoring Plan (NIRB Doc ID: 349359)</i>	In Compliance	In Compliance		B2Gold is implementing a Thermal Monitoring Plan developed with SRK Consulting, including permafrost mapping and instrumentation at key

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
					sites. A draft update is under review, with further monitoring planned as construction progresses. B2Gold will be publishing and submitting the final plan once finalized.
Groundwater and Surface Water Quality					
21. Maintain an Aquatic Effects Monitoring Plan and submit results annually.	<p><i>Aquatic Effect Monitoring Plan (AEMP) (2017)</i> (NIRB Doc ID: 337490)</p> <p><i>2021 and 2022 Aquatic Baseline Reports</i> (NIRB Doc IDs: 349360 & 349361)</p> <p><i>2023 and 2024 Surface Water Quality Reports</i> (NIRB Doc IDs: 351114 & 355344)</p>	In Compliance	In Compliance	NWB	B2Gold submitted an updated Aquatic Effects Monitoring Plan (AEMP v2.0) to the NWB in February 2025. The plan builds on baseline data collected from 2021 to 2024. Monitoring in 2024 showed rising concentrations of several parameters, with exceedances of water quality guidelines and site-specific objectives for pH, nitrate, nitrite, aluminum, cobalt, copper, manganese, and cyanide, especially in Goose Lake and its inflows. Full implementation will begin with discharge activities, followed by annual reporting.
22. Maintain a Site Water Monitoring and Management Plan that minimizes and appropriately manages all contact water.	<p><i>Water Management Plan (Version 5, 2024)</i> (Appendix D, <i>2024 Annual Report</i>; NIRB Doc ID: 355343)</p>	In Compliance	In Compliance	NWB	B2Gold submitted updated Water Management Plan in the <i>2024 Annual Report</i> .
23. Maintain an appropriate setback distance between quarries and fish-bearing or permanent waterbodies.	<p><i>Back River Project Quarry Management Plan (2020)</i> (NIRB Doc ID: 337486)</p>	In Compliance	In Compliance	NWB	All setbacks are described in the QMP and were adhered to in 2024.
24. Prevent blockages or restrictions to fish passages.	<p><i>Rascal Stream West Crossing Construction Monitoring Report (2024)</i> (Appendix F, <i>2024 Annual Report</i>; NIRB Doc ID: 355345)</p>	In Compliance	In Compliance	DFO	All culvert crossings are inspected annually during spring freshet for safety, stability, flow, and fish passage. Rascal Stream West (RSW) culvert crossings were constructed per DFO approvals and

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
	<p><i>Rascal Stream West Arctic Grayling Monitoring: 2024 Field Summary Report and Fish Passage Characterization (2024)</i> (Appendix G, 2024 Annual Report; NIRB Doc ID: 355346)</p>				<p>design intent. Arctic Grayling monitoring in 2024 confirmed successful upstream migration, spawning, and presence of young fish. Temporary impacts from 2023 construction were managed with erosion controls, water diversion, and fish rescue. No lasting changes to fish passage were observed from 2019 to 2024.</p>
<p>25. Mitigate impacts of explosives use on fish habitat.</p>		<p>In Compliance</p>	<p>In Compliance</p>	<p>DFO</p>	<p>All 2024 blasting occurred beyond 400 m from fish habitat, meeting DFO guidelines. No adverse effects were observed.</p>
<p>26. Minimize impacts to the migration of Arctic Grayling.</p>		<p>In Compliance</p>	<p>In Compliance</p>	<p>KIA DFO</p>	<p>Designs for the Rascal Stream diversion were developed with input from DFO and stakeholders. Although construction has not started, 14 rock weirs were installed in 2020 to reduce stream velocity and support Arctic Grayling migration. Final fish passage plans will be submitted to NIRB at least 30 days before construction.</p>
<p>27. Minimize impacts to freshwater fish habitat that may be used for water withdrawal.</p>	<p><i>Downstream Assessment of Goose Lake Water Withdrawal Increase on Arctic Grayling (2024)</i> (Appendix H, 2023 Annual Report; NIRB Doc ID: 349363)</p>	<p>In Compliance</p>	<p>In Compliance</p>	<p>DFO NWB</p>	<p>Water withdrawal sites for the winter ice road (WIR) followed DFO and NWB guidance, with no effects expected on fish habitat. For Goose Lake, a detailed assessment of downstream impacts on Arctic Grayling habitat was completed and submitted to DFO in 2024. DFO determined that a Fisheries Act Authorization amendment is required due to changes in flow conditions.</p>
<p>28. Minimize impacts to fish from the Winter Ice Road</p>	<p><i>Road Management Plan (2021)</i> (Appendix E, 2020 Annual Report; NIRB Doc ID: 334443)</p>	<p>In Compliance</p>	<p>In Compliance</p>	<p>DFO</p>	<p>B2Gold follows all applicable standards and best practices to avoid harm to fish including implementing all recommendations within the</p>

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
					Letters of Advice issued by DFO. All activities comply with NWB licence conditions.
29. Minimize impacts from Water Crossings.	<p><i>Rascal Stream West Crossing Construction Monitoring Report (2024) (Appendix F, 2024 Annual Report; NIRB Doc ID: 355345)</i></p> <p><i>Rascal Stream West Arctic Grayling Monitoring: 2024 Field Summary Report and Fish Passage Characterization (2024) (Appendix G, 2024 Annual Report, NIRB Doc ID: 355346)</i></p>	In Compliance	In Compliance	DFO	All fish-bearing water crossings, including RSW, were constructed following DFO best practices. Monitoring confirmed successful Arctic Grayling migration and no long-term impacts to fish passage. See T&C no. 24.
30. Monitor culverts and to ensure no barriers to fish.	<p><i>Rascal Stream West Crossing Construction Monitoring Report (2024) (Appendix F, 2024 Annual Report; NIRB Doc ID: 355345)</i></p> <p><i>Rascal Stream West Arctic Grayling Monitoring: 2024 Field Summary Report and Fish Passage Characterization (2024) (Appendix G, 2024 Annual Report, NIRB Doc ID: 355346)</i></p>	In Compliance	In Compliance	DFO	Culvert crossings at RSW were designed and constructed per DFO-approved plans, including fish passage criteria and mitigation measures. Monitoring during and after installation confirmed no barriers to fish movement.
31. Provide monitoring updates on the Rascal Stream Fish Passage.		Not Yet Applicable	Not Yet Applicable	DFO	Construction on the Rascal Stram ‘Fishway’ (diversion channel) has not occurred yet.
Vegetation					
32. Minimize the Site Footprint.	<p><i>Vegetation Monitoring Plan (2020) (NIRB Doc ID: 328160)</i></p>	In Compliance	In Compliance		The 2024 Annual Report 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.

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
33. Prevent the introduction of Invasive Species.	<p><i>2024 Vegetation Monitoring Program (2025)</i> (Appendix H, <i>2024 Annual Report</i>; NIRB Doc ID: 355347)</p> <p><i>Pre-Shipment Equipment Cleaning Logs</i> (Appendix H, <i>2024 Annual Report</i>; NIRB Doc ID: 355347)</p>	In Compliance	In Compliance		B2Gold follows established SOPs to ensure all equipment and supplies arriving on site are free of soil and plant debris. Invasive plant monitoring is conducted every three (3) years under the Vegetation Monitoring Plan. The 2024 Vegetation Monitoring Program reported no invasive species.
34. Have a Vegetation Monitoring Plan in place.	<p><i>Vegetation Monitoring Plan (2020)</i> (NIRB Doc ID: 328160)</p> <p><i>Vegetation Monitoring Plan (2025)</i> (NIRB Doc ID: 353315)</p> <p><i>2024 Vegetation Monitoring Program (2025)</i> (Appendix H, <i>2024 Annual Report</i>, NIRB Doc ID: 355347)</p>	Deficient – In Progress	In Compliance	KIA GN	B2Gold’s Vegetation Monitoring Plan (VMP), updated in 2020, includes commitments to assess vegetation impacts from project activities, including winter ice roads and Energy Centre infrastructure. In 2024, photographic monitoring was completed at paired reference and impacted plots along the WIR. No significant vegetation changes were observed.
35. Develop a progressive revegetation program.	<p><i>Interim Closure and Reclamation Plan (2021)</i>, (NIRB Doc ID: 337487)</p>	In Compliance	In Compliance		A conceptual progressive revegetation program is included in the ICRP. While still in early development, the program outlines strategies for revegetating disturbed areas no longer needed for operations. Full details will be submitted within three (3) years of construction start, as required under T&C no. 36.
36. Include a revegetation strategy within its Mine Closure and Reclamation Plan.	<p><i>Interim Closure and Reclamation Plan (2021)</i>, (NIRB Doc ID: 337487)</p>	In Compliance	In Compliance		See T&C no. 35. NIRB looks forward to receiving detailed strategies, including topsoil/organic matter salvage and applicability to Energy Centre components in the next annual report.
Terrestrial Wildlife and Wildlife Habitat					

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
37. Have in place a Wildlife Mitigation and Monitoring Plan (WMMPP).	<i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024)</i> (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance	KIA GN	B2Gold maintained an active Wildlife Mitigation and Monitoring Program Plan (WMMPP) throughout 2024, using Version 12 from January to October and Version 13 from October to December. Mitigation and monitoring measures were effective.
38. Monitor wildlife with relevant parties.	<i>Wildlife Mitigation and Monitoring Program Plan (2024)</i> (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance	KIA GN	B2Gold continues to engage with the GN, KIA, and other parties through the Caribou Technical Advisory Group (CTAG) and collaborative initiatives. In 2024, B2Gold supported regional wildlife monitoring, including hosting GN and GNWT biologists at site and assisting with caribou collar retrieval.
39. Have a staged project activity reduction plan to mitigate potential impacts to caribou.	<i>The 2024 Wildlife Mitigation and Monitoring Program Report (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7)</i> <i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024)</i> (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance		B2Gold maintains a staged activity reduction plan for caribou, outlined in the WMMPP. In 2024, the Caribou Management System was activated five (5) times, with responses ranging from Level 1 to Level 4.
40. Ensure the threshold distances used to trigger caribou mitigation consider an appropriate biological buffer and lag time when based on satellite collar data.	<i>The 2024 Wildlife Mitigation and Monitoring Program Report (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7)</i> <i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024)</i> (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance	KIA GN	B2Gold uses GNWT satellite collar data with an agreed-upon biological buffer to monitor caribou proximity and trigger mitigation. In 2024, collar data was received three (3) times weekly and used to guide activity reductions on three (3) occasions.

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
41. Mitigate impacts on caribou during the July 26 to August 31 period when there is an increased potential of caribou presence.	<i>Wildlife Mitigation and Monitoring Program Plan</i> (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance		B2Gold accounts for increased caribou presence during July 26-August 31 by monitoring GNWT collar data and implementing mitigation measures outlined in the WMMPP. Activities such as blasting and heavy equipment use were adjusted as needed. Future WMMP Reports will include a clear link between collar data, monitoring, and mitigation actions, as recommended by KIA.
42. Ensure mitigation measures apply to all caribou.	<i>Wildlife Mitigation and Monitoring Program Plan</i> (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance		B2Gold applies all caribou mitigation and monitoring measures to all herds, not just Bathurst. The WMMPP includes protocols for calving and post-calving range shifts, and mitigation measures were followed throughout 2024.
43. Develop procedures should wildlife be deemed project tolerant.	<i>The 2024 Wildlife Mitigation and Monitoring Program Report</i> (Appendix C, 2024 Annual Report; NIRB Doc IDs: 355336–355342, Parts 1–7) <i>Wildlife Mitigation and Monitoring Program Plan</i> (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance	GN	Wildlife deterrence protocols are included in the WMMPP and were developed in consultation with CTAG. In 2024, two (2) caribou were gently deterred from high-risk areas using approved methods. No other deterrence was required. All incidents were documented in the 2024 WMMP Report.
44. To develop mitigation measures for muskox.	<i>The 2024 Wildlife Mitigation and Monitoring Program Report</i> (Appendix C, 2024 Annual Report; NIRB Doc IDs: 355336–355342, Parts 1–7) <i>Wildlife Mitigation and Monitoring Program Plan</i> (Version 13, 2024)	In Compliance	In Compliance	GN	Mitigation measures, trigger distances, and group size thresholds for muskox are specified in the WMMPP. In 2024, 29 muskox sightings were recorded, but no mitigation triggers were reached.

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
	(NIRB Doc IDs: 351932 & 351933)				
45. Mitigate potential disturbances to wildlife movement.	<i>Wildlife Mitigation and Monitoring Program Plan</i> (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance		B2Gold applied avoidance and mitigation measures as per the WMMPP to protect denning habitat and support wildlife movement. WIR design included low, feathered snowbanks and daily monitoring. Caribou movement data showed no disruption.
46. Report all direct wildlife mortalities.	<i>The 2024 Wildlife Mitigation and Monitoring Program Report</i> (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7) <i>Wildlife Mitigation and Monitoring Program Plan</i> (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance	KIA GN	Wildlife mortalities were reported annually with cause assessments and mitigation updates. A peak in 2023 (14 incidents) was followed by a reduction in 2024 (3 incidents). Incident reporting followed WMMPP protocols, with coordination with GN and KIA.
47. Mitigate wildlife interaction with the attenuation ponds and/or tailings storage areas.	<i>Wildlife Mitigation and Monitoring Program Plan</i> (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)	Not Yet Applicable	Not Yet Applicable	KIA ECCC	No attenuation ponds or tailings areas were constructed in 2024. Mitigation and monitoring continue under WMMPP and SOP ENVIRO-21.
48. Limit wildlife attraction to the project.	<i>The 2024 Wildlife Mitigation and Monitoring Program Report</i> (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7) <i>Wildlife Mitigation and Monitoring Program Plan</i> (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)	Deficient – In Progress	Deficient – In Progress		In 2024, 29 wildlife deterrent incidents were recorded, including interactions with wolverine (10), wolf (8), bear (6), and caribou (5). One (1) wolverine accessed food waste at the incinerator, leading to enhanced mitigation under WMMPP, including securing attractants and increased monitoring. No further deterrents were needed for wolverine after April.

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
					Mitigation has improved, but with more site activity, stronger deterrent measures may be needed to keep wildlife and staff safe.
49. Report annually on the terrestrial wildlife monitoring to the Nunavut Impact Review Board.	<i>The 2024 Wildlife Mitigation and Monitoring Program Report (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7)</i>	In Compliance	In Compliance		Monitoring in 2024 occurred in accordance with the WMMPP and results were reported in 2024 WMMPP Report.
50. Report annually on the effectiveness of ongoing monitoring and mitigation efforts.	<i>The 2024 Wildlife Mitigation and Monitoring Program Report (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7)</i>	In Compliance	In Compliance		Wildlife monitoring continued in 2024 under WMMPP, including caribou behaviour surveys, collar tracking, and camera programs. Mitigation measures such as staged reduction were triggered five (5) times.
51. Establish a Caribou Technical Advisory Group (CTAG) to provide technical oversight on caribou mitigation and monitoring.	<i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)</i>	In Compliance	In Compliance	KIA GN	CTAG meetings were held in February, May, and December 2024 with GN and KIA. WMMPP updates and collaborative monitoring were discussed. Terms of Reference (TOR) was updated and is expected to be finalized in 2025. NIRB looks forward to receiving the finalized Terms of Reference.
52. Ensure caribou protection from additional mineral exploration.		Not Yet Applicable	Not Yet Applicable	KIA GN GNWT	In 2024, all exploration activities took place within the project development area.
Birds and Bird Habitat					
53. Develop and implement mitigation measures and monitoring for birds and bird habitat.	<i>The 2024 Wildlife Mitigation and Monitoring Program Report (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7)</i> <i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024)</i>	In Compliance	In Compliance		Bird monitoring and mitigation were conducted in 2024 under WMMPP, including surveys, incidental observations, and regional programs for raptors, upland, water, and marine birds. One (1) bird mortality was recorded, likely due to natural predation.

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
	(NIRB Doc IDs: 351932 & 351933)				
54. Mitigate impacts to avian Species at Risk through avoidance.	<p><i>The 2024 Wildlife Mitigation and Monitoring Program Report (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7)</i></p> <p><i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)</i></p>	In Compliance	In Compliance		No nests of species at risk were identified in 2024. Pre-clearing surveys (18 total) and incidental observations led to the protection of seven active nests, with appropriate setback buffers applied.
55. Ensure that mitigation and monitoring strategies developed for Species are Risk are updated.	<p><i>The 2024 Wildlife Mitigation and Monitoring Program Report (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7)</i></p> <p><i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)</i></p>	In Compliance	In Compliance		Mitigation and monitoring measures are outlined in the WMMPP, which includes a current list of species at risk. ECCC has recommended for two (2) years that the Horned Grebe (Western Population) be considered a Species of Conservation Concern under SARA Schedule 1. NIRB encourages B2Gold to update the species status in future WMMP reports to reflect this recommendation.
56. Mitigate impacts to birds from construction and clearing activities.	<p><i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)</i></p>	In Compliance	In Compliance		In 2024, 18 pre-clearing surveys were completed during the breeding season. Seven (7) active nests were identified and protected with setback buffers. Mitigation followed WMMPP.
57. Mitigate impacts to raptors from project construction.	<p><i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)</i></p>	In Compliance	In Compliance	GN-DoE	Raptor pit wall monitoring was initiated in 2024 under WMMPP. No raptor nests were observed in pits or quarries, and no deterrence or nest removal was required.

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
58. Include mitigation measures within the Wildlife Mitigation and Monitoring Plan for seabirds and waterfowl.	<p><i>The 2024 Wildlife Mitigation and Monitoring Program Report (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7)</i></p> <p><i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)</i></p>	In Compliance	In Compliance		Mitigation measures are outlined in WMMPP and the Marine Shipping SOP. In 2024, 121 surveys recorded 674 birds across 25 species. No management actions were required. Monitoring coverage increased from previous years.
59. Report bird mortality.	<p><i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)</i></p>	In Compliance	In Compliance	ECCC	No migratory bird mortalities were recorded in 2024. One (1) ptarmigan mortality was observed, attributed to natural predation. All future mortalities will be reported to ECCC as required.
60. Ensure that project aircraft maintain sufficient cruising altitudes to wildlife.	<p><i>The 2024 Wildlife Mitigation and Monitoring Program Report (Appendix C, 2024 Annual Report, NIRB Doc IDs: 355336–355342, Parts 1–7)</i></p> <p><i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)</i></p>	In Compliance	In Compliance		Aircraft operations followed mitigation measures outlined in WMMPP and the Fixed Wing and Helicopter Operations SOP (June 2024). No wildlife interactions occurred. Caribou near airstrips were safely hazed prior to landings.
61. Ensure aircraft are following minimum flying altitude and to maintain a daily flight log.	<p><i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)</i></p>	In Compliance	In Compliance		<p>Pilots followed altitude guidelines and mitigation protocols through training, SOP reviews, and posted materials.</p> <p>KIA recommended publicly sharing the SOP and clarifying how often flight data is reported. GN requested clearer visuals and tables showing flight paths, altitudes, and wildlife sightings. B2Gold</p>

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
					noted that helicopter altitude data doesn't reflect true height above ground, making mapping difficult. Mitigation is applied only when wildlife is seen. Verbal reporting of caribou sightings to air traffic control is being explored.
62. Maintain a marine monitoring program at the Marine Laydown Area.	<p><i>Marine Laydown Area – 2024 Marine Sampling Report</i> (Appendix J, <i>2024 Annual Report</i>, NIRB Doc ID: 355349)</p> <p>Marine Monitoring Plan (May 2018) (NIRB Doc ID: 319642)</p>	In Compliance	In Compliance		Marine monitoring was conducted in April and August 2024 in accordance with the MMP. No exceedances were observed in water or sediment samples. Benthic sampling showed expected species distribution and diversity. Monitoring will continue in 2025, with results to be reported in the next Annual Report.
Marine Wildlife					
63. Undertake a survey of seals prior to the construction of the winter airstrip and Winter Ice Road (WIR).	<p><i>The 2024 Wildlife Mitigation and Monitoring Program Report</i> (Appendix C, <i>2024 Annual Report</i>, NIRB Doc IDs: 355336–355342, Parts 1–7)</p> <p><i>Wildlife Mitigation and Monitoring Program Plan</i> (Version 13, 2024) (NIRB Doc IDs: 351932 & 351933)</p>	In Compliance	In Compliance		Seal lair surveys were not required in 2024 as the airstrip was not constructed and WIR construction occurred before February 15. Mitigation and monitoring followed WMMPP.
64. Ensure shipping companies contracted have a ship-based marine mammal monitoring protocol.	<p><i>The 2024 Wildlife Mitigation and Monitoring Program Report</i> (Appendix C, <i>2024 Annual Report</i>, NIRB Doc IDs: 355336–355342, Parts 1–7)</p> <p><i>Wildlife Mitigation and Monitoring Program Plan</i> (Version 13, 2024)</p>	Deficient – In Progress	In Compliance	DFO	B2Gold followed WMMPP and the Marine Shipping SOP (July 2024), completing 121 wildlife surveys across 10 vessel sailings. No management actions were needed. AIS data showed vessels generally avoided Prince Leopold Island buffer zones; captains will be reminded for 2025. DFO recommends updating SOPs, adding seasonal

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
	(NIRB Doc IDs: 351932 & 351933)				monitoring, mapping marine mammal areas, assessing underwater noise, and planning for invasive species monitoring if ballast water is released. NIRB encourages B2Gold to work closely with DFO to strengthen marine protection measures.
65. Ensure contracted shipping companies are aware of sensitive wildlife habitat and use appropriate protocols in case of a fuel accident.	<i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024)</i> (NIRB Doc IDs: 351932 & 351933) <i>The Oil Pollution Management Plan</i> (NIRB Doc ID: 319643)	In Compliance	In Compliance		In 2024, 11 marine mammal sightings were recorded across 10 species during shipping operations. No fuel spills occurred, and protocols outlined in WMMPP were followed to prevent environmental harm. Shipping companies continue to use the Marine Shipping SOP (July 2024).
Economic Development and Opportunities					
66. Participate in the work of the Kitikmeot Socio-Economic Monitoring Committee (KSEMC).	<i>2024 Socio-Economic Report (2025)</i> (Appendix B, <i>2024 Annual Report</i> , NIRB Doc ID: 355335) <i>Socio-Economic Monitoring Plan (2025)</i> (NIRB Doc ID: 355414)	In Compliance	In Compliance	KSEMC	B2Gold actively participated in KSEMC meetings, including an in-person session in Cambridge Bay in March 2024. Engagement with community stakeholders and integration of traditional knowledge are ongoing and documented in the Socio-Economic Monitoring Report (SEMR).
67. Develop Terms of Reference for the project-specific Socio-Economic Monitoring Working Group (SEMWG).	<i>2024 Socio-Economic Report (2025)</i> (Appendix B, <i>2024 Annual Report</i> , NIRB Doc ID: 355335) <i>Socio-Economic Monitoring Plan (2025)</i> (NIRB Doc ID: 355414)	In Compliance	In Compliance	KIA GN CIRNAC Communities	B2Gold continues active participation in the SEMWG, including hosting a videoconference in May 2024. A revised Terms of Reference was completed in mid-2024 in consultation with SEMWG members and submitted to NIRB.
68. Develop a Project-specific Back River Socio-Economic Monitoring Program.	<i>2024 Socio-Economic Report (2025)</i> (Appendix C, <i>2024 Annual Report</i> , NIRB Doc ID: 355335)	In Compliance	In Compliance	KSEMC KIA GN	The Project’s socio-economic monitoring framework is outlined in the Socio-Economic Monitoring Plan (SEMP) and Report submitted to NIRB in March 2025.

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
	<i>Socio-Economic Monitoring Plan (2025)</i> (NIRB Doc ID: 355414)			CIRNAC Communities	
69. Analyze potential risks of temporary mine closure.	<i>Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects (2018)</i> (NIRB Doc ID: 320331)	In Compliance	In Compliance		B2Gold submitted a report on temporary mine closure risks and socio-economic impacts to NIRB in 2018. An update is planned for 2025.
70. Ensure Socio-Economic Management Plan and Socio-Economic Management Program address the risk and potential effects of temporary mine closure.	<i>Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects (2018)</i> (NIRB Doc ID: 320331) <i>Socio-Economic Monitoring Plan (2025)</i> (NIRB Doc ID: 355414) <i>Community Engagement Plan</i> (NIRB Doc ID: 355411) <i>Inuit Human Resources Plan</i> (NIRB Doc ID: 355413) <i>Inuit Business Development Plan</i> (NIRB Doc ID: 355412) <i>Stakeholder Grievance Mechanism</i> (NIRB Doc ID: 349370)	In Compliance	In Compliance		B2Gold submitted a report on temporary mine closure risks and socio-economic impacts to NIRB in 2018. An update is planned for 2025.
Employment					
71. Submit staff schedule information.	<i>2024 Socio-Economic Report (2025)</i>				B2Gold submitted the 2025 construction period staff schedule in Appendix D of the 2024 SEMR. A

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
	(Appendix B, 2024 Annual Report, NIRB Doc ID: 355335)	In Compliance	In Compliance		schedule for the operations phase will be submitted at the appropriate time.
72. Provide the GN with register of Trades Workers	2024 Socio-Economic Report (2025) (Appendix B, 2024 Annual Report, NIRB Doc ID: 355335)	In Compliance	In Compliance	GN	Information on trades workers, journeypersons, and apprentices is included in the 2024 SEMR and was shared with GN via email in February 2024. B2Gold launched the Back River Inuit Workplace Experience Program with Redfish Arts Society to support Inuit youth development and future apprenticeship opportunities.
Education and Training					
73. Work with training organization to ensure training opportunities.	2024 Socio-Economic Report (2025) (Appendix B, 2024 Annual Report, NIRB Doc ID: 355335)	In Compliance	In Compliance	GN Training - Organizations	B2Gold Nunavut engaged with training partners including the GN, Kitikmeot Corporation, and Hamlet of Kugluktuk throughout 2024. Discussions are underway to establish a tripartite MOU with GN and KIA to enhance Inuit employment and training.
74. Maintain a referenced listing of formal certificates and licences that may be acquired on-site.	2024 Socio-Economic Report (2025) (Appendix B, 2024 Annual Report, NIRB Doc ID: 355335)	In Compliance	In Compliance	GN Training - Organizations	An updated list of formal certificates and licences available through on-site or supported training was provided in Appendix F of the 2024 SEMR.
75. Review education utilization rates for Project employees to identify whether employees are accessing opportunities available to them.	2024 Socio-Economic Report (2025) (Appendix B, 2024 Annual Report, NIRB Doc ID: 355335) Socio-Economic Monitoring Plan (2025) (NIRB Doc ID: 355414)	In Compliance	In Compliance	GN KSEMC	B2Gold conducted an Inuit Personnel Survey in Oct-Nov 2024 across Project sites. Results show increased high school completion rates among Inuit personnel compared to 2022. Most respondents completed education in the Kitikmeot Region or NWT. Future surveys will be conducted every two years, with the next planned for 2026.
76. Provide second language training.	2024 Socio-Economic Report (2025) (Appendix B, 2024 Annual Report, NIRB Doc ID: 355335)	In Compliance	In Compliance		Second language training is offered upon request and communicated through the B2Gold's Indigenous & Northern Affairs team. No requests

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
	<i>Inuit Human Resources Plan</i> (NIRB Doc ID: 355413)				were made in 2024. To reduce language barriers, B2Gold employs Inuit Support Coordinators, provides translation support, and has circulated a bilingual glossary for site signage.
Population Demographics					
77. Monitor demographic changes affecting the Kitikmeot communities.	<i>2024 Socio-Economic Report (2025)</i> (Appendix B, <i>2024 Annual Report</i> , NIRB Doc ID: 355335)	In Compliance	In Compliance	KSEMC	In 2024, 3,221 personnel worked on the Project, including 233 Inuit, mostly from the Kitikmeot Region. Demographic data is tracked in the SEMR.
Traditional Activity and Knowledge					
78. Ensure Inuit Qaujimajatuqangit and Traditional Knowledge are incorporated into monitoring plans.	<i>Socio-Economic Monitoring Plan (2025)</i> (NIRB Doc ID: 355414)	In Compliance	In Compliance	KIA KSEMC	B2Gold developed the document <i>Guidance for Incorporating Community Perspectives and Traditional Knowledge</i> , included in Appendix C of the SEMP.
79. Establish an Inuit Environmental Advisory Committee (IEAC).	<i>2024 Socio-Economic Report (2025)</i> (Appendix B, <i>2024 Annual Report</i> , NIRB Doc ID: 355335) <i>Inuit Impact Benefit Agreement (IIBA)</i> (KIA and B2Gold 2018)	In Compliance	In Compliance	KIA	The IEAC was established under the Back River IIBA and includes seven (7) Kitikmeot Inuit members with knowledge of wildlife, land use, and the environment. The committee held its second annual meeting and site visit in June 2024. Details are provided in Appendix G of the 2024 SEMR.
80. Assess potential impacts of winter ice road usage on caribou harvesting.	<i>2024 Socio-Economic Report (2025)</i> (Appendix B, <i>2024 Annual Report</i> , NIRB Doc ID: 355335)	In Compliance	In Compliance		Daily monitoring of the WIR in 2024 showed no public use, though snowmobile tracks were observed. B2Gold continues to engage communities and communicate that the WIR is not open to public use. A five-year harvest study is being developed to further assess potential impacts.
Non-Traditional Land Use and Resources Use					
81. Consult with outfitting and guiding businesses in the area to assess and	<i>2024 Socio-Economic Report (2025)</i>				B2Gold developed an Outfitting/Guiding Business Consultation Protocol (Appendix D, SEMP) and

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
monitor potential Project effects on non-traditional activities.	(Appendix B, 2024 Annual Report, NIRB Doc ID: 355335) Socio-Economic Monitoring Plan (2025) (NIRB Doc ID: 355414)	In Compliance	In Compliance		maintains a Stakeholder Grievance Mechanism. A biennial informational letter was sent in March 2024 to licensed outfitters and HTOs in Cambridge Bay, Kugluktuk, Bathurst Inlet, and Bay Chimo. No responses or grievances were received. The next letter will be issued in 2026.
82. Assess archaeological and heritage resources.		In Compliance	In Compliance	GN	In 2024, pedestrian surveys were conducted in 11 proposed development areas at the Goose Property Area. No new archaeological sites were found. A reported stone structure was confirmed as a historic survey marker, not archaeological. Updated site status tables and maps were submitted to the Government of Nunavut in November 2024.
Health and Wellbeing					
83. Assess and support employee access to housing.	2024 Socio-Economic Report (2025) (Appendix B, 2024 Annual Report, NIRB Doc ID: 355335) Inuit Human Resources Plan (NIRB Doc ID: 355413)	In Compliance	In Compliance	GN-NHC	B2Gold met with NHC in July 2024 to explore housing partnerships. Financial literacy support is available on request through the Inuit Employee Assistance Program and Employee and Family Assistance Program (EFAP). Discussions are underway to establish a tripartite MOU with GN and KIA to enhance collaboration on housing initiatives.
84. Assess and monitor project-induced effects on regional housing.	2024 Socio-Economic Report (2025) (Appendix B, 2024 Annual Report, NIRB Doc ID: 355335) Socio-Economic Monitoring Plan (2025) (NIRB Doc ID: 355414)	In Compliance	In Compliance	GN KSEMC	The 2024 Inuit Personnel Survey showed 66% of respondents live in public housing and 14% in private homes, consistent with 2022. Interest in homeownership remained steady at 21%. Residential mobility increased, with 21% changing residences in the past 24 months.

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
85. Establish a cross-cultural awareness training.	<p><i>2024 Socio-Economic Report (2025)</i> (Appendix B, <i>2024 Annual Report</i>, NIRB Doc ID: 355335)</p> <p><i>Inuit Human Resources Plan</i> (NIRB Doc ID: 355413)</p>	In Compliance	In Compliance	KIA	B2Gold provides mandatory cultural awareness training for long-term staff and contractors, with 318 participants in 2024 across 38 sessions. Training covers Inuit culture, community engagement, and intercultural effectiveness. Materials were updated with KIA input. B2Gold also marked the National Day for Truth and Reconciliation with staff engagement and a commissioned design by Inuit artist April Pigalak.
Human Health and Safety					
86. Monitor and mitigate for airborne actinolite fibers.		In Compliance	In Compliance		B2Gold has an Industrial Hygiene Monitoring Program in place. Initial sampling shows no health risks, with asbestos levels below 0.1%. Monitoring will continue, and mitigation measures are ready if risks are identified.
87. Have in place a site orientation plan.		In Compliance	In Compliance		B2Gold has a comprehensive site orientation program for all personnel. Materials are reviewed and updated regularly, with records maintained.
88. Include consideration for worker safety in its winter ice road (WIR) operations.	<i>Road Management Plan (2021)</i>	In Compliance	In Compliance		B2Gold’s Road Management Plan includes safety measures for WIR operations, especially during adverse weather. Emergency shelters are approved and under construction. Safety procedures will be updated throughout the project.
Accidents and Malfunctions					
89. Include prevention measures for fuel spills into the marine environment and mitigating potential effects of an accidental spill.	<i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024)</i> (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance		B2Gold’s WMMPP and updated OPEP outline measures to prevent and respond to fuel spills, including protection of marine wildlife.

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
	<p><i>Oil Pollution Emergency Plan (2023)</i> (Appendix I, 2022 Annual Report, NIRB Doc ID: 343957)</p> <p><i>Spill Contingency Plan (2015)</i> (NIRB Doc ID: 280283)</p>				
<p>90. Maintain an Oil Pollution Emergency Plan (OPEP).</p>	<p><i>Oil Pollution Emergency Plan (2023)</i> (Appendix I, 2022 Annual Report, NIRB Doc ID: 343957)</p>	<p>In Compliance</p>	<p>In Compliance</p>	<p>TC</p>	<p>B2Gold maintains an updated OPEP. The plan includes authorized personnel, staff training, and the required spill report form. The plan was updated in 2024, is currently under review by Transport Canada, and will be submitted to NIRB once approved.</p>
<p>91. Contract certified vessels for shipping and ensure awareness of the requirements.</p>	<p><i>Shipping Management Plan (2024)</i> (NIRB Doc ID: 355756)</p> <p><i>Oil Pollution Emergency Plan (2023)</i> (Appendix I, 2022 Annual Report, NIRB Doc ID: 343957)</p> <p><i>Risk Management and Emergency Response Plan (2018)</i> (NIRB Doc ID: 319645)</p>	<p>In Compliance</p>	<p>In Compliance</p>	<p>TC</p>	<p>B2Gold contracts only certified vessels and ensures shippers are aware of the Shipping Management Plan, Risk Management and Emergency Response Plan, and OPEP. The plans were updated in 2024 to reflect current fuel offload activities and ballast water regulations.</p>
<p>92. Ensure availability of spill response equipment.</p>	<p><i>Oil Pollution Emergency Plan (2023)</i> (Appendix I, 2022 Annual Report, NIRB Doc ID: 343957)</p>	<p>In Compliance</p>	<p>In Compliance</p>		<p>B2Gold maintains spill response equipment and provides training to employees, contractors, and local community members. The updated OPEP includes inventory and training records and is reviewed annually before fuel offload.</p>

Term and Condition	Reference Document (s)	Compliance 2023-2024	Compliance 2024-2025	Responsible Parties/ Authorities	NIRB Comment
93. Submit a post-construction depiction of the MLA.		Not Yet Applicable	In Compliance	DFO	In-water construction at the Marine Laydown Area occurred in 2024. B2Gold will submit a post-construction depiction, including bathymetry, to DFO before the 2025 open water season and notify NIRB once submitted.
94. Ensure fuel trucks meet industry design standards.		In Compliance	In Compliance		B2Gold ensures fuel trucks meet industry standards and undergo regular maintenance. Monthly inspections were completed throughout 2024, and maintenance records are included in the annual report.
95. Prevent adverse impacts to birds from Project activities and infrastructure including wind turbines.	<i>Wildlife Mitigation and Monitoring Program Plan (Version 13, 2024)</i> (NIRB Doc IDs: 351932 & 351933)	In Compliance	In Compliance		WMMPP includes updated mitigation and monitoring measures for avian wildlife, incorporating feedback from CTAG. A dedicated appendix (Appendix A) for the Wind Energy Centre outlines operational protocols. Monitoring will continue during construction and operation phases.
96. Assess the potential impacts of the Project and approved Modifications on wildlife harvesting in the area.			In Progress		B2Gold is in the process of developing plans for a five-year harvest study in the Project area. As this Term & Condition was only recently issued, further details and results from this study will be presented in future annual reports
97. Ensure that Inuit and local employment is not reduced when the transportation of fuel is reduced due to the transition from diesel generators to alternative energy sources		Not Yet Applicable	Not Yet Applicable		Construction of the Back River Energy Centre has not yet begun. B2Gold Nunavut plans to develop a Fuel Transport Employee/Contractor Transition Plan in 2025/2026 to ensure Inuit and local employment is maintained. The plan will be submitted to NIRB once finalized.

Table 6 Commitments

Requirement	NIRB Comment
NIRB Monitoring Responsibilities	
1. NIRB to appoint Monitoring Officer(s)	Completed by NIRB and overseen by Manager, Project Monitoring.
2. NIRB to report annually on the monitoring program (in English, Inuinnaqtun, and Inuktitut)	Completed by NIRB: issued monitoring report for 2023-2024 in February 2025.
3. NIRB to conduct periodic community meetings updates regarding its Monitoring Program	Completed by NIRB on August 20, 2025
4. NIRB to schedule periodic site inspections.	Completed by NIRB on August 11, 2025
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.	The Proponent has the permits it requires for the construction, operation, and exploration.
6. Duty to Comply with environmental laws and regulations and/or regulatory instruments, prompt action to remedy non-compliance and report any non-compliance.	Summary of regulatory compliance provided in Section 4.4 of B2Gold’s <i>2024 Annual Report</i>
7. Posting of adequate performance bonding.	Summary of regulatory compliance provided in Section 4 of B2Gold’s <i>2024 Annual Report</i>
Monitoring Records	
8. Information requirements for monitoring reporting.	Monitoring information provided in the <i>2024 Annual Report</i>
9. Make significant monitoring results and/or summaries of significant results available in English, Inuinnaqtun, and Inuktitut, to the extent feasible.	Executive summary was provided in the <i>2024 Annual Report</i> in both Inuktitut and Inuinnaqtun.
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.	B2Gold has indicated it maintains records, including results, of all Project-related monitoring data and analysis for the life of the Project.
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.	Updated management and monitoring plans and current versions within the <i>2024 Annual Report</i>
12. Publicly accessible Project-specific web portal or web page to make available in a central location all significant non-confidential monitoring and reporting information submitted to regulatory authorities.	<p>The NIRB notes that no Project reports or management plans are available on B2Gold’s website.</p> <p>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</p>

	repository for the Project and to make it easier for individuals to locate all materials related to the project.
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.	Section 2 of the <i>2024 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.	Completed by NIRB: commenting period in May-June 2025 followed by giving B2Gold an opportunity to address comments in July-August 2025

3.2. NIRB Site Visit and Public Information Session

3.2.1. Site Visit

On August 11, 2025, NIRB staff conducted a visit to the Goose property. During the site visit, the NIRB staff observed that facilities at the Goose Lake Property were generally maintained according to required environmental protection measures. Construction of the mill and other facilities were still ongoing. It was noted the efforts B2Gold has made to reduce potential impacts with re-use of secondary containment for hazardous material storage, the concrete catchment areas at refueling points, and the lined helipads.

NIRB staff identified the following specific areas for improvement, which were noted in the Site Visit Report²:

- Several areas of the Goose Exploration Camp appeared unorganized, with materials placed directly on disturbed tundra. The settling pond berms resembled stacked soil rather than engineered structures.
- Dust management appeared limited along high-traffic areas near Goose Lake. Additionally, dust fall monitors were not observed in these locations.
- Limited translation of signage was noted around the site, particularly at the plant pad, and active construction areas, where clear communication is essential.
- Question regarding the sufficient strength of the Rascal Stream West Culvert to support the heavy traffic expected once the Goose Pit is developed.

3.2.2. Public Information Session

On the evening of August 20, 2025, the NIRB held a public information session in Cambridge Bay to provide an update on the Back River Project. No members of the public attended.

4. Findings and Recommendations

4.1. Monitoring Findings

B2Gold Nunavut has generally provided required reporting under the Project Certificate, and as applicable to the current phase of the project. However, as noted in Table 5, there are specific incidences of exceedances or non compliances, but include information about the mitigation or plan to be implemented in response. The Board is aware that generally speaking reporting through the annual monitoring report shows that existing plans or mitigation and

² Doc ID: 357401

work by the Proponent and regulators addressed the situations and brought the overall operations into compliance. The NIRB looks forward to updates by B2Gold on these issues.

Despite the specific identified issues, the project is generally functioning in accordance with the Terms and Conditions and Commitments of the Project Certificate with no significant issues raising concerns regarding the impact of the project.

In regard to the annual reporting, the NIRB notes that the volume of material submitted in the annual report is increasing year by year, which is consistent with the reports submitted for other projects within Nunavut. Much of this information is reporting that is required to be reported to regulatory authorities and creates redundancy that may be unnecessary. The NIRB will be discussing this issue with B2Gold and other parties.

The NIRB notes that Project Certificate section 3.2 states:

12. The Proponent shall establish a publicly-accessible Project-specific web portal or web page to make available in a central location all significant non-confidential monitoring and reporting information submitted to Regulatory Authorities pursuant to the Project Certificate and other territorial or federal permits issued for the Project. For clarity, posting on the Project-specific site does not replace any reporting obligation of the Proponent pursuant to the Project Certificate or any territorial or federal permit.³

The existence of an online location for such documents would provide a method which may help address the issue of the volume of material, and redundant material, submitted to the NIRB. While B2Gold Nunavut does currently have a website for much of this information, it may not provide the breadth of information contemplated in the Project Certificate.

4.2. Board Recommendations

As noted above, there yet no Project-specific web portal or web page meeting the requirement of 3.2 (12) of the Project Certificate.

Recommendation 1: B2Gold Nunavut shall provide an update within 30 days of receiving the NIRB Monitoring Officers' 2025 Report, on the development of a publicly-accessible Project-specific web portal or web page to make available in a central location all significant non-confidential monitoring and reporting information submitted to Regulatory Authorities pursuant to the Project Certificate and other territorial or federal permits issued for the Project.

Recommendation 2: B2Gold Nunavut shall have a publicly-accessible Project-specific web portal or web page to make available in a central location all significant non-confidential monitoring and reporting information submitted to Regulatory


³ Doc ID: 351081, p. 14

Authorities pursuant to the Project Certificate and other territorial or federal permits issued for the Project in place for the 2026-2027 reporting year.

5. Conclusion

B2Gold Nunavut has increased its activities at the Back River Project through a full year of construction activities and the beginning of operations and commercial production. They have 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: Varun Nayak Monitoring Officer Keith Morrison Manager Project Monitoring	Reviewed by: Keith Morrison Manager Project Monitoring
Date: November 26, 2025	Date: November 26, 2025
Signature: Varun Nayak 	Signature: Keith Morrison 