

APPENDIX L RECLAMATION AND REVEGETATION LITERATURE REVIEW

MEMO

TO	B2Gold Nunavut
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REFERENCE	0773592
SUBJECT	Goose Mine: Reclamation and Revegetation Literature Review

1. INTRODUCTION

1.1 OBJECTIVES

The objective of this memo is to support revegetation and progressive reclamation planning at the Goose Project (the Project) to meet Nunavut Impact Review Board (NIRB) Project Certificate No. 007 Amendment No. 001 (NIRB 2024) Term and Condition 36, by providing potential options for B2Gold Nunavut to consider and progress closure. In support of this, this memo includes:

- Summary of reclamation and revegetation term and conditions and commitments in the NIRB Project Certificate, FEIS, and associated comments (Section 2);
- Summary of the history of reclamation and current status at the Project (Section 3);
- Literature review of best practices and industry experiences for Arctic reclamation and revegetation (Section 4); and,
- Recommendations for progressive reclamation and revegetation strategies to meet Term and Condition 36, including practicality of topsoil/organic matter salvage, and progress revegetation planning for the eventual closure of the Project (Section 5).

2. REVEGETATION AND RECLAMATION CONDITIONS AND COMMITMENTS

NIRB Terms and Conditions (Project Certificate No. 007 Amendment No. 001 [NIRB 2024]) and FEIS (Sabina 2015) commitments on reclamation and revegetation are provided in Attachment A and Attachment B.

NIRB Term and Condition 36 outlines requirements for revegetation at the Project as it relates to the Mine Closure and Reclamation Plan, including considerations for progressive reclamation and maintenance of an up-to-date revegetation plan for the Project. NIRB Term and Condition 36 includes the following:

Category: Vegetation – Mine Closure and Reclamation Plan

Project Phase: Pre-Construction, Construction, Operations, Temporary Closure/Care and Maintenance, Closure and Post-Closure Monitoring

Objective: To maintain an up-to-date revegetation plan for the Project.

Term or Condition: The Proponent shall include revegetation strategies within its Mine Closure and Reclamation Plan that support progressive reclamation, and promote natural revegetation and recovery of disturbed areas compatible with the surrounding natural environment. These strategies should include exploration of the feasibility and practicality of topsoil/organic matter salvage through Project development. The Closure and Reclamation Plan should be updated on an on-going basis as more information becomes available from similar reclamation efforts at other northern projects, as applicable.

Reporting Requirements: Within three (3) years from the commencement of construction of the Back River Gold Mine Project, information regarding the revegetation strategies developed and implemented by the Proponent in fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board and this information will include reclamation strategies for the Energy Centre Project. Subsequently, information regarding the Proponent's progress in fulfillment of this Term and Condition shall be provided annually in the Proponent's annual report to the Nunavut Impact Review Board. Whenever the Proponent makes subsequent revisions to the Monitoring Plan(s), the Proponent shall submit the updated Plan to the NIRB within 60 days of revising the Plan(s) and will ensure the updated Plan is posted on the Proponent's project website.

NIRB Term and Condition 36 should be addressed in consideration with other NIRB Terms and Conditions and FEIS commitments that outline reclamation and revegetation requirements. NIRB Terms and Conditions supporting No. 36 include No. 35, 34, 32, 15, and

and revegetation has not been implemented to date at either the Goose Mine or Marine Laydown Area (ICRP Section 6.4; Sabina 2021).

Through development of the ICRP, natural revegetation was identified for most Project areas due to the cold climate and established practices for mine closure in Nunavut (ICRP Section 6.3; Sabina 2021). For most areas, strategies that support and encourage natural revegetation and recovery will be applied as appropriate (ICRP Section 6.3; Sabina 2021). Natural revegetation and recovery was selected based on results of the literature review of reclamation practices at northern mine sites as summarized in ICRP Appendix E, June 2018 (Sabina 2021), and included studies on active revegetation, seeding, and/or soil amendment trials. This initial review concluded that active revegetation offers limited benefits offset by logistical and cost challenges, as well as potential environmental impacts (Sabina 2021). Key constraints identified included harsh Arctic growing conditions, limited availability of native seed, lack of suitable growth media, lack of suitable soil amendments, and possible adverse effects on the physical stability of surficial soils (Sabina 2021).

In support of reclamation and revegetation, B2Gold Nunavut explored the feasibility of practicality of topsoil/organic matter salvage. B2Gold Nunavut stockpiled topsoil/organic layer and overburden material from the Echo and Umwelt open pits for reclamation at closure. Soil horizons were thin in these areas and so the organic and topsoil layers were not salvaged/stockpiled separately from the overburden material which primarily consists of unconsolidated material (silty clay loam). Assessment of the feasibility of topsoil/organic material salvage will be completed on a site-specific basis.

4. REVIEW OF ARCTIC RECLAMATION PRACTICES

- Reclamation Policy and Guidelines (Section 4.1);
- Arctic Conditions and Limitations for Revegetation (Section 4.2);
- Site Preparation (Section 4.3);
- Revegetation (Section 4.4);
- Monitoring (Section 4.5);
- Other Considerations (Section 4.6); and,
- Inuit Traditional Knowledge (Section 4.7).

Northern mining projects relevant to Goose Mine (Nunavut, low Arctic) and incorporated in the review include Mary River Mine (Nunavut, high Arctic), Diavik Diamond Mine (Northwest Territories, Subarctic), Red Dog Mine (Alaska, low Arctic), Colomac Mine (Northwest Territories, Subarctic), Atlin Ruffner Mine (British Columbia, alpine tundra), Ekati Mine (Northwest Territories, Subarctic), Snap Lake Mine (Northwest Territories, Subarctic boreal-tundra transition), Hope Bay Mine (Nunavut, high Arctic), and Meliadine Mine (Nunavut, low Arctic).

4.1 RECLAMATION POLICY AND GUIDELINES

Policy and guidelines for mine reclamation and revegetation in Nunavut include the Mine Site Reclamation Policy for Nunavut (Indian and Northern Affairs Canada [INAC] 2002a), Mine Reclamation Guidelines for the Northwest Territories and Nunavut (INAC 2002b), and Northern Land Use Guidelines (e.g., INAC 2003; INAC 2009; INAC 2010). The Mine Site Reclamation Policy for Nunavut (INAC 2002a) states mine reclamation should be based on the 1994 Whitehorse Mining Initiative definition of mine site reclamation:

returning mine sites and

NWT Lands (GNWT 2015), Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories (MVLWB 2013), Mine Site Reclamation Guidelines for the Northwest Territories (INAC 2007), Northern Landscaping: A Guide to Restoring the Plants and Soil in Northern Communities (CMHC 2002), Yukon Revegetation Manual: Practical Approaches and Methods (Matheus & Omtzigt 2013), Integrated Mine Closure Good Practice Guide, 3rd Edition (International Council on Mining and Metals 2025), among others assessed. Guidelines highlight that successful reclamation requires the re-establishment of soil processes such as nutrient cycling and native plant communities including a diversity of shrub, forb, graminoid, and bryophyte species.

4.2 ARCTIC CONDITIONS AND LIMITATIONS FOR REVEGETATION

Arctic environments have a variety of environmental constraints that make revegetation challenging (INAC 2009), including extreme climate, permafrost features, and tundra ecosystem succession. Arctic climates have a short growing season, short frost-free period, low temperatures, low precipitation, and high winds resulting in wind erosion and plant desiccation (Billings 1987; Chapin 1987; MVLWB 2013; Bliss & Matveyeva 1992; Nadelhoffer et al. 1992; Bell & Bliss 1980; Matheus & Omtzigt 2013; Lamarre et al. 2023). Tundra has permafrost-controlled soils (cryosols) that are cold, typically shallow soils with limited (< 5 cm) topsoil development, thin active layer (rooting zone layer that thaws each summer), slow rates of decomposition and nutrient turnover, and limited available moisture and nutrients (Bliss & Matveyeva 1992; Nadelhoffer et al. 1992; Matheus & Omtzigt 2013; MVLWB

- Backfilling and Capping (Section 4.3.2);
- Topsoil and Organic Material Salvage (Section 4.3.3);
- Substrate Amendment (Section 4.3.4); and,
- Surface Preparation (Section 4.3.5).

4.3.1 MINE SUBSTRATES

Mine disturbances and substrates pose additional difficulty for vegetation recovery (Adams & Lamoureux 2005). The physical characteristics of mine substrates include steep slopes and instability, poor soil structure and texture (e.g., coarse soils with low water holding capacity), infertile soil media (low cation exchange capacity, low organic matter) with susceptibility to drought, high surface temperatures, surface evaporation, etc. (Adams & Lamoureux 2005; INAC 2009). Substrates are typically deficient of macronutrients (e.g., nitrogen, phosphorus), organic material, and fungal root associates (i.e., mycorrhiza), making revegetation challenging (Adams & Lamoureux 2005). Tailings and other mine waste also often have elevated metals, salts, or acidity which pose direct limitations to plant growth through heavy metal or ionic toxicity (Adams & Lamoureux 2005; Cater 2010).

Mine substrates requiring reclamation often include mine tailings, waste rock, crushed rock, gravel, or till. Different mine substrates have shown different success in revegetation trials and programs. Heterogeneous substrates (e.g., crushed rock/mixed gravel, glacial till, volcanic silt, lava) with mixed particle size and surface heterogeneity/microhabitats typically show better revegetation success than homogeneous substrates (e.g., processed kimberlite, lake sediment) with similar particle size with smoother surfaces, having higher live cover, density, and spontaneous colonization (Lamarre et al. 202

1987; MVLWB 2013; Stuckless et al. 2025). To support revegetation, the substrate and gravel covering should be sufficiently deep (e.g., ≥ 1 m) for plant roots to prevent root interference with contaminated materials (Stuckless et al. 2025).

- In non-contaminated areas, reclamation substrates are typically applied at depths of 30-50 cm over 50 cm gravel (e.g., Budzey et al. 2025; Drozdowski et al. 2012; Lamarre et al. 2023).

4.3.3 TOPSOIL AND ORGANIC MATERIAL SALVAGE

Soil reconstruction is considered the most important element of reclamation (Johnson 1987). Topsoil salvage and placement involves the removal of the topsoil layer prior to disturbance followed by reapplication to restore native soils for purposes of revegetation as recommended by Arctic reclamation guidelines (Alaska Department of Natural Resources 2025; GNWT 2015; INAC 2009; INAC 2010; MVLWB 2013). Topsoil includes mineral soils with organic material, nutrients, mycorrhizae, and soil biota along with native seed bank and propagules including buried seed, stems, roots, and rhizomes that expedite vegetation growth (Chapin III & Chapin 1980; Johnson 1987; INAC 2009; United States Geological Survey [USGS] 2000).

Topsoil salvage and placement have benefited reclamation and revegetation performance on northern disturbed sites in many cases, including mines (Bishop

impacts soil characteristics reducing seed bank viability and germination (Abdul-Kareem and McRae 1984; Birnbaum et al. 2016; Golos et al. 2017; Mackenzie & Naeth 2019).

- When spreading material, prevent compaction by using low compaction tracked equipment, avoid soil handling when wet, and roughening surface after spreading to create microsites (INAC 2009).
- When spreading material, apply on the surface rather than incorporating material and apply with variable coverage, including higher application rates in select areas (Miller et al. 2021; e.g., 15 cm topsoil and 15 cm subsoil [Bahroudi 2024]). For seeding, mineral soil (e.g., topsoil) should be exposed, since Arctic plants typically require exposed mineral soils for germination and seeding onto mulches, erosion control mats, or organics often does not produce established seedlings (Adams & Lamoureux 2005).

4.3.4 SUBSTRATE AMENDMENT

Substrate amendments are materials applied to improve the physical and chemical characteristics of the reclamation substrate, such as use of organic matter (e.g., sewage, compost), fine materials, fertilizers, mycorrhizae, and other amendments. If topsoil salvage and placement are not possible to restore native soils, soil reconstruction can be completed using organic and fine-grained material amendments (Johnson 1987; Forbes & Jefferies 1999). Soil amendment has been shown to facilitate vegetation development in disturbed Arctic environments and mines (e.g., Diavik Mine [Drozdowski et al. 2012; Miller & Naeth 2021; Naeth 2004; Neath & Wilkinson 2014; Diavik Diamond Mines Inc. 202

(Bahroudi 2024). Organic amendments found to be a less effective amendments include water treatment sludge (Neath & Wilkinson 2014), leonardite (Bahroudi 2024), and biochar (e.g., Diavik Mine [Drozdowski et al. 2012; Miller & Naeth 2017; Naeth 2004; Neath & Wilkinson 2014; Rio Tinto 2017]). Performance of other bio pellets is unknown (Ekati Mine [Dominion Diamond Mines Ltd. 2018]).

Sewage sludge is an effective amendment for enhancing nutrients and plant cover (Bishop et al. 2000; Reid 2003). Neath & Wilkinson (2014) found that sewage increased available nitrogen/phosphorus, plant density/cover, and species richness with seeding. Miller et al. (2021) found best seed establishment in crushed rock with sewage sludge incorporation (upper 5–10 cm). Sewage sludge (biosolids) has been effective at initiating plant growth at northern mines; however, investigation of potential negative effects (e.g., pathogens, heavy metals, nitrates) is ongoing (e.g., Diavik Mine [Drozdowski et al. 2012; Miller & Neath 2017; Naeth 2004; Neath & Wilkinson 2014; Rio Tinto 2017], Red Dog Mine [ABR Inc. 2007], and Ekati Mine [Dominion Diamond Mines Ltd. 2018]). For example, Drozdowski et al. (2012) found sewage sludge had adverse high concentrations of high copper, molybdenum, phosphorus, selenium, sulphate and zinc. Sewage sludge also has fecal coliform (*Streptococcus*) and *Salmonella* (Naeth 2004) but may be reduced by 99.98% through winter application (Ekati Mine [Dominion Diamond Mines Ltd. 2018]). Sewage amendment is included in some reclamation plans, such as sewage mixed with till in progressive reclamation (e.g.,

Bahrودي 2024; CMHC 2002; Forbes & Jefferies 1999). Fertilizers tend to favour non-native agronomic plant species rather than native plant species since Arctic native species are often adapted to the low nutrient conditions of the Arctic (e.g., Section 4.2; Chapin III & Chapin 1980; CMHC 2002). The dense flush of grasses in response to fertilization can inhibit natural colonization by shrubs and other species and potentially alter successional pathways (Chapin et al. 1995), relevant considering the shrub succession pattern seen under natural revegetation patterns in which shrubs establish prior to graminoid meadows (Viereck 1966). Shrubs have also been shown to perform better without fertilization (Turcotte et al. 2025). Some studies; however, have found low NPK effective at increasing total vegetation cover of bryophytes and other vascular plants (e.g., Neby et al. 2022). Fertilizers also favour above ground growth rather than root growth, which may be a better indication of long-term revegetation success in Arctic conditions where species have high root:shoot ratios (Adams & Lamoureux 2005). Due to the low holding capacity of coarse materials common in mining reclamation substrate, fertilizer runoff has the potential to impact downstream water bodies (Adams & Lamoureux 2005; MVLWB 2013) and nutrients may not be retained (depleted quickly), so benefits of accelerated growth may be shorter term (ABR Inc. 2007; Miller & Neath 2017).

Guidelines note the importance of minimal and judicious use of fertilizers for Arctic reclamation (e.g., CMHC 2002; MVLWB 2013; Matheus & Omtzigt 2013; USGS 2000), instead favouring topsoil/organic salvage

- Use slow-release fertilizers to avoid leaching (Adams & Lamoureux 2005; USGS 2000), such as MagAmp 7:52:6 NPK or Osmocote 14-14-14 NPK 2-year-release form (USGS 2000).
- Application should occur when plants are large enough to utilize fertilizers (i.e., after a few years growth) to prevent runoff (Adams & Lamoureux 2005).

4.3.4.3 FINE MATERIALS

Fine materials are used to amend coarse materials to improve soil structure for improved water retention ability, soil moisture, and nutrient retention for revegetation (Drozdowski et al. 2012; Forbes & Jefferies 1999; Neath & Wilkinson 2014), and is recommended by guidelines (e.g., MVLWB 2013). Fine materials may include glacial till, lakebed sediments, glaciolacustrine deposits, or zeolite, used to amend coarse materials such as waste rock. In mine reclamation applications, mixes of coarse waste rock with fine textured till have been shown to reduce adverse element concentrations and improve revegetation (e.g., 25:75 mix of processed kimberlite to till; Drozdowski et al. 2012; Neath & Wilkinson 2014). Zeolite amendment (fine textured) was also found to have the highest biomass and species richness (Bahroudi 2024). Lake bed sediments also have potential for reclamation and showed some vegetation recovery (e.g., Miller et al. 2021; Miller & Neath 2017). Fine materials; however, are prone to wind and water erosion (Johnson 1987), which can be reduced by surface roughening. Homogenous fine materials like some mine tailings materials instead should be amended by coarse materials.

preparation (microhabitats) for revegetation establishment, with some variability based on site-specific considerations (e.g., presence of permafrost, erosion potential). In general, surface preparations should aim to recreate similar site conditions as undisturbed/baseline conditions to which native plants are adapted.

4.3.5.1 SLOPE STABILIZATION AND EROSION CONTROL

Slope stabilization and erosion control are required prior to other surface preparation to prevent loss of fine materials (Johnson 1987). Techniques include contouring to match the surrounding landscape natural angle, constructing gentle ($< 2:1$) rounded slopes where possible, terracing/stepping steep slopes, rounding excavated slopes, and maintaining natural hydrology (INAC 2009; EDI 2020). Recontouring can be completed using stockpiled overburden with mineral topsoil placed on top at variable depths where possible (INAC 2009). Frozen material for reconstruction is not recommended since the ground ice may melt and cause subsidence (GNWT 2015; INAC 2009; INAC 2010). In cases where erosion is severe, other erosion and sediment controls such as cross ditches, berms or swales, and erosion control mats or tarps may be needed (GNWT 2015a, 2015b; INAC 2009; INAC 2010). Erosion control products such as anionic polymer Soil Lynx (soil binder) are also available but were found to not be effective on diamond mine wastes with high sand content (Miller et al. 2021). Surface decompaction and roughening through the rough-and-loose technique also slows water movement, increases water infiltration, and reduces erosion as shown in Arctic reclamation (Government of Northwest Territories 2017; Section 4.3.5.2).

Other uses may be a consideration, since the resulting rough surface from scarification of rock can impede wildlife and human movement, and so it may be desirable to maintain some smooth surfaces for travel in some circumstances (e.g., as identified by Inuit Traditional Knowledge Panel, Diavik Diamond Mine [Rio Tinto 2025]). Near surface permafrost sites also need special considerations for surface roughening such as reduced depth (Section 4.3.6). On slopes scarification/raking should be done perpendicular to the slope to aid in slowing water movement for erosion control.

4.3.6 PERMAFROST CONSIDERATIONS FOR SITE PREPARATION

Contouring, decompaction, and other surface preparation activities with heavy equipment should be managed to prevent permafrost melting. Nunavut RAC (2012) describes Good Environmental Practice Considerations in Canadian Permafrost Regions including use of tracked equipment.

Best practices to protect permafrost during Arctic reclamation include:

- On lowland permafrost sites with permafrost close to the soil surface, surface work should be minimized to light harrowing or raking (e.g., only the top few centimetres) rather than deep soil turning to avoid damage to permafrost (i.e., do not cultivate the frozen ground; Matheus & Omtzigt 2013). Arctic mines generally implement these best practices, such as limiting earthworks to <35 cm depth to protect permafrost (EDI 2020).
- Restore hydrological function and natural drainage patterns by aligning with surrounding landscape and terrain are also important to prevent water ponding/lakes which can result in permafrost degradation and ground subsidence (EDI 2020; INAC 2009).
- Maint

reduce plant-available water in summer due to transpiration (Budzey et al. 2025), while natural succession studies show snow accumulation as vegetation develops (Viereck 1966). Some industry reclamation and closure plans also reference the use of berms for snow capture and rock/boulder placement (ABR Inc. 2007).

4.4 REVEGETATION

Arctic revegetation includes both natural and active revegetation to restore plant communities and stabilize permafrost conditions (Nunavut RAC 2012; EC 2012). Active revegetation techniques include seeding, planting, transplanting vegetative mats or plugs, live staking, and cuttings/sprigs. Natural revegetation involves natural colonization and recruitment of plant species, which can be passive or facilitated through site preparation methods or maintenance of seed-sources. Kempenaar et al. (2013) provides information on site-specific considerations for passive versus active revegetation including erosion risk, proximity to seed sources, presence of seed bank, presence of invasive species, site productivity, cost, site diversity, site stressors, and disturbance size. Arctic native plants are well adapted to harsh Arctic environments including poor nutrient conditions and hardy to cold temperatures and frost (Antonovics et al. 1967; Densmore et al 1990; Wielgolaski 1975; Munshower 1994; Brown 1997). Revegetation in the Arctic is generally slow (Section 4.2), with recovered vegetation expected to not provide surface erosion control or visual quality for 1-10 years (Adams & Lamoureux 2005). Early patterns of Arctic plant colonization and growth have been shown to influence later successional community composition (Kearns et al. 2015; Viereck 1966), highlighting the importance of suitable revegetation methods.

through good site preparation methods (Section 4.3; e.g., topsoil placement, soil reconstruction, surface roughening), snow removal to lengthen growing season (Cater 2010), and through maintenance of nearby seed sources.

Experience across northern mines indicates natural regeneration is generally slower but has favourable effects in terms of greater species diversity and re-establishment of native plants (e.g., ABR Inc. 2007; EDI 2020; Meidinger 1979). Natural regeneration (unassisted) has been effective for mine disturbances (abandoned airstrip and roadsides), with early colonizers present within 1-3 yrs and 60–70% cover after 40 yrs post-disturbance (Audet & Setterington 2024). Arctic graminoids (grasses, sedges) and forbs are generally quicker to recover, while shrubs and mosses are slower to recover, and lichen are very slow to recover (Audet & Setterington 2024). In organic soils, native sedges can re-establish biomass equal to undisturbed tundra within 5-10 years (Chapin III & Chapin 1980) and for minor disturbances (e.g., vehicle tracks on tundra) natural revegetation is just as effective as active revegetation (Neby et al. 2022). Large natural disturbances (e.g., several kilometres [km] length and 1 km width) of gravel outwash (coarse mixed substrates) have also been shown to revegetate naturally without amendment (e.g., Viereck 1966). More expansive disturbances or sites contaminated with mining waste (e.g., tailings) are frequently shown to have very poor passive vegetation recovery (e.g., Naeth & Wilkinson 2014) and facilitated natural revegetation or active revegetation may be needed (Kempenaar et al. 2013; Matheus & Omtzigt 2013).

Similar to most

recommend integrating natural revegetation with active revegetation methods. Generally, sites with expansive disturbances shown to have very poor natural revegetation recovery, may require intervention with active revegetation (Kempenaar et al. 2013; Matheus & Omtzigt 2013; Naeth & Wilkinson 2014). Guidelines, industry examples, and research findings for best practices are summarized below for active revegetation methods.

Findings and best practices in active revegetation are included for:

- Seeding (Section 4.4.2.1);
- Planting (Section 4.4.2.2);
- Transplanting (Section 4.4.2.3);
- Staking and Sprigs (Section 4.4.2.4); and,
- Bryophyte Propagation (Section 4.4.2.5).

4.4.2.1 SEEDING

Seeding is the most commonly applied and tested active revegetation method in Arctic environments, considered most effective when applied selectively, integrated with natural revegetation, and tailored to site conditions. Seeding can be utilized for large disturbances, erosion-prone slopes, or sites with poor natural recovery potential (Johnson 1987; Kempenaar et al. 2013; INAC 2009; GNWT 2015a; MVLWB 2013). Research and guidelines highlight the importance of using appropriate locally adapted native species to avoid the intentional or accidental introduction of invasive or unsuitable plants. Species selection for seeding include considerations in Section 4.4.3, including use of local native seed (Section 4.4.3.1) and diverse species composition. Seeded species typically include native gr

- Seed on exposed mineral soils (e.g., topsoil) for better germination (Adams & Lamoureux 2005);
- Rake/furrow soil after seeding (e.g., to 1-2.5 cm) to improve seed-to-soil contact (USGS 2000);
- If mulches, erosion control mats, or organics are used, apply as topdressings since seedlings germinating on top of organics can quickly desiccate (Adams & Lamoureux 2005);
- Spring seeding after snowmelt is best, though fall frost seeding prior to snowfall can also be effective (Johnson 1987; Naeth 2004; Turcotte et al. 2025; Matheus & Omtzigt 2013);
- If commercial seed must be used, seed certification and pure live seed (PLS) quality are essential to prevent accidental introduction of non-native or weed seeds (Naeth 2004; Matheus & Omtzigt 2013);
- Methods of application typically recommended include dry broadcast seeding by hand or using ATV-mounted rotary spreaders, depending on site conditions (e.g., size and accessibility; USGS 2000); and,
- Tailor seeding rates to site-conditions and allow for natural revegetation (infiltration) to occur. Lower seeding rates should be used for flat, organic-rich areas (e.g., natural revegetation or 500-1,000 PLS/m²; Matheus & Omtzigt 2013) and higher rates for bare mineral soils or steep slopes ($\geq 2,250$ –3,000 PLS/m²; Matheus & Omtzigt 2013) requiring faster establishment (Turcotte et al. 2025).

4.4.2.2 PLANTING

- Shelter improves planting survival (Stuckless et al. 2024);
- Implement infill planting or multi-phased planting where required (Kuzyk et al. 2025; Stuckless et al. 2024);
- Water in dry conditions where feasible (May et al. 1982; Stuckless et al. 2024); and,
- Use experienced planters (Stuckless et al. 2024).

4.4.2.3 TRANSPLANTING

Transplanting of Arctic vegetation involves harvesting as tundra sod (i.e., tundra mats or carpets) or as plugs or root saucers from a donor site and placing at placement site (Adams & Lamoureux 2005). Tundra sodding is based on the traditional practice by the Iñupiaq peoples' of Alaska using the Nuna ulu technique (meaning "land/earth knife"), used to construct traditional sod houses and to insulate entryways to ice cellars (Cater 2015). Transplanted materials should be sourced from salvaged material since disturbance to intact tundra is not sustainable (Adams & Lamoureux 2005; Lynn 2025; Forbes & Jefferies 1999; MVLWB 2013; USGS 2020), with tundra sod donor sites including sites prior to disturbance, or possibly ocean bluffs being lost to erosion and climate change. This highlights the importance of salvaging and separating the tundra sod from lower overburden layers during mine construction.

Transplanting of tundra sod has had considerable success in the Arctic (Vital 1976). Wet tundra is more suitable for tundra sodding than drier sites due to their thicker organic layer and rhizomatous species (e.g., *Carex aquatilis*, *Dupontia fisheri*

grasses (e.g., *Arctophila fulva*, *Agrostis borealis*, *Calamagrostis canadensis*, *Deschampsia* spp., *Festuca altaica*, *Luzula confusa*, *Poa arctica*, *Puccinellia* spp., *Trisetum spicatum*), sedges (*Eriophorum scheuchzeri*, *Carex aquatilis*, *Carex podocarpa*), legumes (e.g., *Astragalus* spp., *Hedysarum* spp., *Lathyrus* spp., *Lupinus* spp., *Oxytropis* spp., *Vicia* spp.) and other forbs (e.g., *Artemisia* spp., Asteraceae, Brassicaceae, *Cerastium beeringianum*, *Epilobium angustifolium*, *Senecio* spp.), and shrubs alder (*Alnus* spp.) and willow (*Salix* spp.), among other plant species (ABR Inc. 2007; Adams & Lamoureux 2005; Forbes & Jefferies 1999; Klebesadel 1973; Viereck 1966; Webber & Ives 1978).

4.4.3.1 LOCAL SEED AND PLANT PROPAGULE COLLECTION

Seed and propagule collection originates from the best practice to source native plants locally to conserve the gene pool/provenance and due to the inadequate commercial source of native Arctic plant species (Johnson 1987; Kuzyk et al. 2025; Webber & Ives 1978) as recommended

monitoring is a requirement for mine reclamation in Nunavut (INAC 2002a, 2002b). Circumpolar Arctic Vegetation Science Initiative (CAVSI; 2025) is currently developing Arctic research network and methods/best practices. Studies implemented a variety of methods to assess the performance of reclamation and revegetation practices including greenhouse experiments (e.g., Hagan 2002), landscape level reclamation trials (e.g., Ekati Mine [Dominion Diamond Mines Ltd. 2018]; Mary River Mine [EDI 2020];), randomized block experimental design (e.g., Budzey et al. 2025; Lamarre et al 2023; Miller et al. 2021; Naeth 2004), and time since disturbance chronosequence (e.g., Audet & Setterington 2024). Remote sensing technologies are also applied for revegetation assessment at mines (Gordon et al. 2023). Monitoring timelines for mines post-reclamation are variable but often reference plant cover or other criterion (e.g., Diavik Diamond Mine uses annually until mean 5% cover met, expected in 5-10 years [Diavik Diamond Mines Inc. 2025]).

Best practices for Arctic reclamation and revegetation monitoring include:

- Revegetation targets – develop revegetation targets that are specific and based on site conditions and target ecosystems. Different features will potentially require different reclamation strategies and surface configurations (EDI 2020);
- Consider Arctic species have high root:shoot ratios, so root development may be better indicator for long-term revegetation success (Adams & Lamoureux 2005). Assess below ground biomass and long-term survivability, not just initial rate of growth above ground (Adams & Lamoureux 2005);
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plant species diversity but have similar total species diversity (Oberndorfer et al. 2020). Examples include soil enrichment (nutrient inputs) resulting from Inuit fishing histories (favouring grasses) and calcium enrichment (favouring calciphiles) near middens and sod houses of Inuit (bones, shells), influencing plant species composition (Oberndorfer et al. 2020). Iñupiaq peoples of Alaska also traditionally practiced tundra sod collection using the Nuna ulu technique (meaning “land/earth knife”), used to construct traditional sod houses and to insulate entryways to ice cellars (Cater 2015).

5. REFERENCES

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ATTACHMENT A NIRB TERMS AND CONDITIONS

NIRB Condition No.	Category ^a	Project Phase ^a	Objective	Term or Condition ^a	Reporting Requirements ^a	IRCP Section (July 2021)
				e. Details on how the Proponent will carry out continued analyses over time to confirm or update the approximate fill time for the mine pits.		

ATTACHMENT B FEIS COMMITMENTS

ATTACHMENT C COMMENTS

ATTACHMENT D LITERATURE REVIEW TABLE

