



Report Title: The Nunavut Impact Review Board's 2022-2023 Annual Monitoring Report for the Back River Gold Mine Project (NIRB File No. 12MN036)

Project: Back River Gold Mine Project

Project Location: Kitikmeot Region, Nunavut

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Monitoring Period: October 2022 – September 2023

Date Issued: December 11, 2023

Cover Photo: Goose Camp, 2023

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1.0 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 Nunavut's (B2Gold) (formally Sabina Gold & Silver Corporation (Sabina)) Back River Gold Mine Project (Back River or the Project) from October 1, 2022, to September 30, 2023.

1.1 Project Components and Current Status

The Back River Gold Mine Project (NIRB File No. 12MN036) consists of the proposed mobilization, construction, operation, closure, reclamation, and post-closure monitoring of a gold mine operation in the Kitikmeot region of Nunavut. The Project is located approximately 400 kilometres (km) southwest of the community of Cambridge Bay, 95 km southeast of the southern end of Bathurst Inlet, and 520 km northeast of Yellowknife, Northwest Territories and includes the Goose Property and the Marine Laydown Area (MLA) located at Bathurst Inlet, with a Winter Ice Road (WIR) interconnecting these two (2) main developments areas.

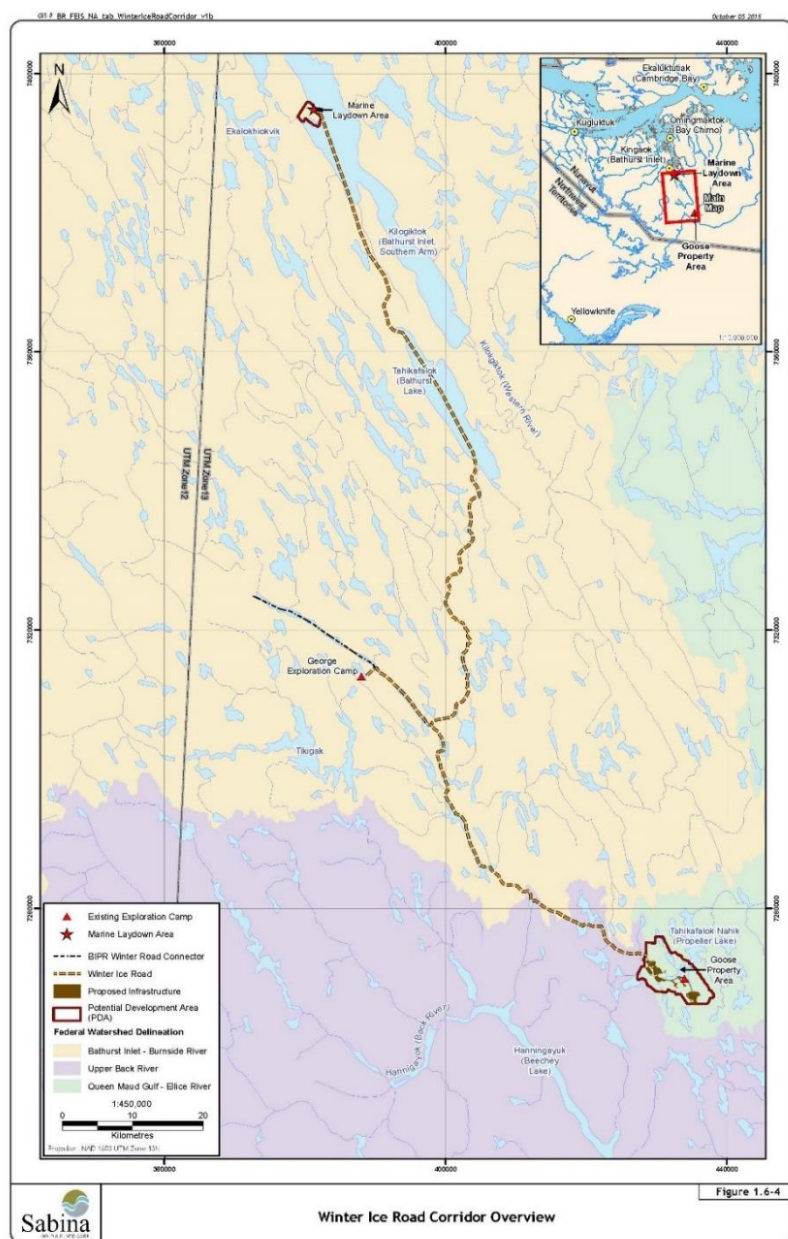


FIGURE 1: BACK RIVER PROJECT LOCATION OVERVIEW

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

The MLA is located approximately 130 km north-northwest of the Goose Property and is the primary staging area for equipment, material, fuel, and other supplies required for the construction

and operation of the Project. The MLA will consist of a single barge terminal, laydown areas, a camp facility, and associated storage and maintenance facilities. Once constructed the Project will be resupplied annually from southern Canada by barge during the open water season. Project materials will then be transported annually from the MLA to the Goose Property using a winter ice road from mid-January to April.

The George Property is an advanced exploration camp located approximately 50 km northwest of the Goose Property and B2Gold may construct an annual spur road from the winter ice road to the George Property for transportation of supplies. The continuation of a diamond drilling-based mineral exploration program for the George Property and the Wishbone claim of mineral leases was included within the scope of the Board's assessment for the Back River Project. It should be noted that further advanced exploration

(i.e., bulk sampling and infrastructure development) was not included in the Project with the understanding that such activities would require further assessment by the NIRB before occurring. In 2020, B2Gold applied to the NIRB with the “2020 Modification Package” which included widening and extension of the airstrips, additional water use, a change in mine plans, adjustment of the Winter Ice Road, the construction of a sealift unloading pad, and other changes which the NIRB determined did not require an amendment to the Project Certificate but stated that updates to management and mitigation plans and modifications to the existing monitoring program were required.

In 2022 B2Gold undertook the following major activities which continued in 2022:

- Construction of 10 ML fuel tanks at MLA and Goose;
- Goose and MLA site road network expansion up to approximately 20 km;
- Pads complete for permanent camp, plant, and fuel storage;
- Approximately 1 500 m of exploration underground ramp completed;
- Pre-stripping commenced at Echo Open Pit;
- All major equipment and materials for have been procured; and
- Continued ongoing environmental monitoring and baseline programs.

In September 2022, Sabina announced that it had financing to fund the construction and development of the Goose Mine.

In December 2022, Sabina submitted the 2023 Winter Ice Road Technical Memorandum to both the NIRB and the Kitikmeot Inuit Association outlining the construction, operations, and closure of the 2023 WIR season.

All documentation associated with the original Back River Project and the 2020 Workplan are available online from the NIRB’s Public Registry at www.nirb.ca/projects/124149.

Back River Project Energy Centre

In August 2022, NIRB received a referral from the Nunavut Planning Commission for the new proposal of B2Gold, “Back River Project Energy Centre”. This proposal consists of the addition of 13 wind turbines, a solar panel, and a Battery Energy Storage System at Goose Camp. On January 20, 2023, the Board released its notice of reconsideration for the proposal. On March 13, 2023, the NIRB received the Final Environmental Impact Statement Addendum and on March 22, 2023, the Addendum was accepted, and the Technical Review of the document started and continued through the summer and fall with the parties and proponent submitting materials.

The NIRB conducted the Technical Meeting, Community Roundtable and Pre-hearing Conference from October 2-5, 2023, regarding the “Back River Project Energy Centre” project proposal. The Pre-Hearing Conference report was released on November 24, 2023.

All documentation associated with the “Back River Project Energy Centre” project proposal, including application materials filed by the Proponent with the NIRB can be accessed from the NIRB’s Public Registry at www.nirb.ca/project/125740.

1.2 Project History

TABLE 1: BACK RIVER PROJECT HISTORY

Year	Achievement/Comment
December 2017	The NIRB issued Project Certificate No. 007 and Sabina applied for authorizations to commence construction of the mine
April 2018	Sabina and the Kitikmeot Inuit Association entered into a land tenure and Inuit Impact Benefit Agreement
April 2018	Pre-development commenced at the Marine Laydown Area (MLA) including the construction of a 40-person camp, earthworks, airstrip, and laydown storage areas. At Goose site, commencement of earthworks; including quarry expansion, heavy equipment upgrades and initial road and bridge construction
November 2019	Sabina received its Type “A” Water License (2AM-BRP1831) which allows for the construction and operation of the mine activities
December 2018 to May 2019	Winter Ice Road was constructed and operated
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 and concluded that sufficient work has been done at the MLA and at Goose for the Project to have entered the construction phase.
Summer 2021	Work was carried out on expanding the airstrip, site roads, laydown area, and exploratory and geotechnical drilling. Amendment of Type “A” licence 2AM-BRP1831
September 2022	Sabina officially announces that the Project is entering in construction.
January 2023	NIRB notice the Minister regarding the “Back River Project Energy Centre” project proposal.
March 2023	Proponent submitted the Final Environmental Impact Addendum.
March 2023	NIRB started the Technical Review on the Back River Project Energy Centre
May 2023	NIRB hosted Community Information Sessions about the Back River Project Energy Center Proposal
October 2023	Technical Meeting, Community Roundtable and Pre-Hearing Conference regarding the “Back River Project Energy Centre” proposal.

MONITORING ACTIVITIES

1.3 General Reporting Requirements

On March 31, 2023, Sabina provided the 2022 Annual Report for the Back River Project (*2022 Annual Report*). The *2022 Annual Report* summarized the Project activities and consultation efforts with stakeholders undertaken in 2022. It also included a summary outlining the status of compliance, methods employed to complete work, a summary of results, trends, and next steps for each of the Terms and Conditions in Project Certificate No. 007. The following was also provided:

- 2022 Annual Geotechnical Inspection Report
- Aquatic Baseline Report
- Sabina's Back River Blasting Plan for Plant Site and Portal Decline
- Vegetation Monitoring Program
- Pre-Shipment Equipment Cleaning
- 2022 Pre-Construction Wildlife Mitigation and Monitoring Plan
- 2022 Socio-Economic Monitoring Report
- Oil Pollution Emergency Plan
- Marine Monitoring Report

1.4 Compliance Monitoring

Proponent's Responses to the Board's 2021-2022 Recommendations

On December 7, 2022, the NIRB issued a Board recommendation to Sabina resulting from the NIRB's 2021-2022 monitoring efforts requesting information regarding the drafting/submission of nine (9) documents or plans in the 2022/2023 monitoring year (Public Registry ID No. 342283). On January 20, 2023, B2Gold provided responses to address each of the recommendations (Public Registry Document ID No. 342637).

The Monitoring Officers had recommendations regarding several terms and conditions and B2Gold responded to those as well. A summary of the recommendations and the responses are as follows.

Monitoring Officers Recommendation	B2Gold's Response
The NIRB requested updated and/or dated photos in the executive summary	
For filing on the NIRB's Public Registry. NIRB requested that B2Gold submit plans separate from the Annual Report	

Monitoring Officers Recommendation	B2Gold's Response
The NIRB requested the 2021 Geotechnical Report(s) within 60 days of receiving the Monitoring Report	Sabina provided the information, and it was filed on the NIRB's Public Registry
Requested a discussion of information regarding Term and Condition 50 Results of the Term and Condition No. 50 in Sabina's 2022 Annual Report and all future annual reports	
With Term and Condition No. 56, Sabina presented contradicting information on ground-clearing in its <i>2021 Annual Report</i> and Appendix F. Please referred to the note in Appendix A and clarify in 60 days	Sabina responded that there was an error, and the statement should have read that no ground clearing surveys occurred because ground-clearing activities occurred outside of the breeding season.
Related to the Term and Condition No. 51, Sabina stated that it met with the Caribou Technical Advisory Group, although no information is available on what are the outcomes of these meetings. In future annual reports, NIRB requests that outcomes or discussions from these meetings be included.	
Term and Condition 78 the NIRB requested clear links in documents or in the annual report how comments received from community members or Inuit Qaujimajatuqangit led to management actions or updates in the monitoring year. Additionally, detail is required on the feedback mechanism for reporting monitoring results back to communities so the public can understand not only the results of the monitoring programs but also how their previous concerns and suggestions are addressed or considered.	
For Term and Condition 83 the NIRB requested information regarding ongoing discussions with the GN and Nunavut Housing Corporation and	

Monitoring Officers Recommendation	B2Gold's Response
how B2Gold will be working towards achieving the term and condition.	
Term and Condition 86 the NIRB requested information about actinolite fibre monitoring at site. Specifically, the NIRB would like to know if there is ongoing monitoring for the fibres now that work has started progressing on the portal and if there is no monitoring why that has not started within 60 days of receipt of this report	B2Gold confirmed that ongoing monitoring was occurring.
Monitoring Officers request the location and/or a copy of the Road Management Plan 2021 as it is unable to locate the report within the <i>2021 Annual Report</i>	

1.4.1 Compliance Achievements

Compliance monitoring involves an assessment undertaken by regulators and other agencies to establish whether or not the Project is being carried out as required by relevant legislation, regulations, instruments, commitments, and agreements. Compliance monitoring, as reported by Authorizing Agencies, is also a requirement of the NIRB's Monitoring Program for the Back River Project.

During the 2022-2023 reporting period, the Proponent was generally successful in meeting the requirements of the Project Certificate. Due to the early stages of development of the Back River Gold Mine Project, it is noted that some Terms and Conditions as contained within Project Certificate No. 007 may not be applicable for this monitoring period and/or have not yet been thoroughly implemented at this time by B2Gold.

Compliance Monitoring by Regulatory Authorities

On April 24, 2023, the NIRB requested that Regulatory Authorities with jurisdiction and/or area of expertise for the Back River Project provide comments and information concerning compliance monitoring for the 2022 reporting period as required by Project Certificate No. 007. Specifically, comments were requested regarding the following:

- Provide a summary of any compliance monitoring and/or site inspections undertaken in association with the Project, including specifically:
 - 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 2022 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.

On or before June 8, 2023, the NIRB received comments from the following parties:

Comment Submission	Document ID
Kitikmeot Inuit Association (KIA)	345499
Government of Nunavut (GN)	345484
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)	345479
Environment and Climate Change Canada (ECCC)	345478
Fisheries and Oceans Canada (DFO)	345464
Transport Canada (TC)	345780

On August 30, 2023, the Proponent submitted responses to parties' comments (Public Registry ID No: 346987).

1.4.1.1 KITIKMEOT INUIT ASSOCIATION

The Inuit Impact and Benefits Agreement (IIBA) and the Framework Agreement between Sabina and the Kitikmeot Inuit Association (KIA) cover terms and conditions in the NIRB Project Certificate 007, and conditions of land use licencing and reporting. Under the IIBA, Sabina has committed to inform the KIA regularly on both the socio-economic and ecosystemic effects of their operations in the Kitikmeot Region.

Per Appendix A of Section 3.1 of the Framework Agreement, Sabina provides a separate Annual Report to KIA that specifies the details of its operations under any land use License, Advanced Exploration Lease and/or Commercial Lease, which is separate from the *2022 Annual Report* submitted to the NIRB. KIA confirmed receiving the Back River Project 2022 Annual Report for the KIA Framework Agreement.

Sabina is to also provide information on the socio-economic effects through IIBA Implementation Committee, B2Gold Liaison and the IIBA Manager; and ecosystemic effects through the Inuit Environmental Advisory Committee (IEAC) of their operations in the Kitikmeot Region. The implementation of the Back River IIBA was accomplished on December 12, 2022. The IEAC will be formally established in July 2023.

KIA conducted an in-person site inspection in 2022 from July 26 to 29. KIA inspected the Goose Lake Camp, the Marine Laydown Area (MLA) and George Lake Camp. A summary of the site visit by KIA is included in its comment submission.

1.4.1.2 CROWN-INDIGENOUS RELATIONS AND NORTHERN AFFAIRS CANADA

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

- The *Department of Crown-Indigenous Relations and Northern Affairs Act*
- The *Nunavut Land Claims Agreement Act* and the *Nunavut Agreement*;
- The *Arctic Waters Pollution Prevention Act and Regulations*;
- The *Nunavut Waters and Nunavut Surface Rights Tribunal Act and Regulations*; and
- The *Territorial Lands Act and Regulations*.

CIRNAC noted it is responsible for inspecting and enforcing any terms and conditions contained within the Water Licences associated with the Project. The Project's 2022 activities and monitoring were conducted under the following Water Licences:

- Type "A" Water Licence 2AM-BRP1831;
- Type "B" Water Licence 2BC-BRP1819;
- Type "B" Water Licence GOO2028;
- Type "B" Water Licence GEO2025; and
- Type "B" Water Licence 2BE-MLL1722.

In 2022, CIRNAC's Water Resource Officer (WRO) conducted two (2) inspections. The first inspection occurred in June and the second in November. A summary of the inspection report is included in CIRNAC's submission. CIRNAC mentioned that terms and condition 4, 7, 12, 13, 15,17, 18, 19, 21, 22, 23, 27, 28 and 62 have been integrated in the NWB water license No: 2AM-BRP1831.

1.4.1.3 ENVIRONMENT AND CLIMATE CHANGE CANADA

The Project is not currently subject to the *Metal and Diamond Mining Effluent Regulations* (MDMER) but will be subject to this regulation when active. No inspections were conducted in 2022, but Environment and Climate Change Canada (ECCC) did note a fuel release to ice in February 2022, but no enforcement action was taken.

1.4.1.4 FISHERIES AND OCEANS CANADA

No amendments were made to the Proponent's *Fisheries Act* Authorization (FAA). As required in the FAA, monitoring reports for the Rascal Stream Diversion were received by Fisheries and Oceans Canada (DFO) on June 1, 2023. The proponent was in compliance with the FAA in 2022. DFO notes that the project is still under construction at this time, therefore numerous Terms and Conditions and their associated monitoring have yet to be triggered/initiated. DFO looks forward to reviewing the results of these monitoring programs when they become available.

No compliance monitoring or site visits were completed by DFO during the 2022 reporting period.

1.4.1.5 TRANSPORT CANADA

Transport Canada (TC) has a mandate according to:

- *Canada Shipping Act*;
- *Navigation Protection Act*; and
- *Transportation of Dangerous Goods*.

Based on the information available to date, the Project was in compliance with legislation administered by the Department and with the authorizations issued to it by Transport Canada's *Navigation Protection Program*. TC completed an inspection of the Project's Oil Handling Facility in August 2022, and no issues were identified. The Project's Oil Handling Facility is in compliance with the *Canada Shipping Act, 2011* and the Environmental Response Regulations.

Transport Canada has issued authorizations for various works associated with the Project and no compliance issues were noted in 2022:

- 2012-600767-002 – Navigation Protection Act – MLA Discharge Pipeline Authorization
- 2012-600767-003 – Navigation Protection Act – MLA Intake Pipeline Authorization
- 2012-600767-006 – Navigation Protection Act – MLA Lightering Barge Authorization

1.5 Effects Monitoring

Effects monitoring is an assessment of the measurable change to a particular environmental or socio-economic component, as compared to the potential effects that were predicted to result from a proposed development. Impact predictions and mitigation measures were outlined and developed throughout the impact assessment review of the Back River Project and were recorded and presented through the Final Environmental Impact Statements (FEIS), amendments, and other related documents.

As a part of its annual monitoring program, the NIRB requested that Regulatory Authorities with jurisdiction over project components or activities, or those with specific expertise, provide comments regarding the effects assessment associated with the Project.

On April 24, 2023, the NIRB also requested that Regulatory Authorities with expertise or jurisdiction for the Back River Project provide comments and information for effects monitoring for the 2022 reporting period. Specifically:

- a. Whether the conclusions reached by Sabina in the *2022 Annual Report* are valid; and
- b. Any areas of significance requiring further supporting information or any changes to the monitoring program which may be required.

1.5.1.1 KITIKMEOT INUIT ASSOCIATION

Overall, KIA found that Sabina's conclusions of the *2022 Annual Report* are valid with several being partially met. KIA's wildlife consultant noted that there are several reoccurring issues with Terms and Conditions 32, 34, 35, 41, 45, 46, 58, and 64.

A summary of KIA's recommendations regarding the requested information and proposed changes to monitoring is presented in Table 2.

1.5.1.2 GOVERNMENT OF NUNAVUT

A summary of the Government of Nunavut's comments is presented in Table 2.

1.5.1.3 CROWN-INDIGENOUS RELATIONS AND NORTHERN AFFAIRS CANADA

In its submission, CIRNAC noted that based on its mandate, it did not identify any information that would invalidate the conclusions reached by Sabina in the *2022 Annual Report*. A summary of CIRNAC's recommendations regarding the requested information and proposed changes to monitoring is presented in Section Table 2.

1.5.1.4 FISHERIES AND OCEANS CANADA

Based on its mandate, Fisheries and Oceans Canada (DFO) commented on the management, protection and conservation of fish and their habitat. DFO's comments on the *2022 Annual Report* are presented in Table 2.

1.5.1.5 ENVIRONMENT AND CLIMATE CHANGE CANADA

ECCC's comments on the *2022 Annual Report* are presented in Table 2.

1.5.1.6 TRANSPORT CANADA

Transport Canada (TC) noted that the Project was in compliance with the regulatory requirement administered by the Department and with the authorizations issued. A summary of TC's recommendations regarding the requested information and proposed changes to monitoring is presented in Table 2.

1.5.2 B2Gold Nunavut Responses

In their submissions reviewing the *2022 Annual Report* parties made recommendations for Sabina and on August 30, 2023, Sabina responded to those recommendations. A summary of recommendations and responses are provided in Table 2; reference numbers are as per the B2Gold Response to Comments. For detailed information, please see the submissions and B2Gold's response document (referenced above).

TABLE 2: COMMENTS AND RESPONSES

Comment/Recommendation	B2Gold Response
Kitikmeot Inuit Association (KIA)	
KIA-NIRB-01 <ul style="list-style-type: none"> Clarify if construction phase will begin in 2023. If the Project is in construction phase will wildlife monitoring be implemented as the <i>Wildlife Mitigation and Monitoring Plan</i> (WMMP). 	<ul style="list-style-type: none"> The Project will be in the construction phase in 2023. Multiple monitoring programs are to occur within the first three (3) years of construction.

Comment/Recommendation	B2Gold Response
<p>KIA-NIRB-02</p> <ul style="list-style-type: none"> • Clarify if Standard of Procedures (SOP) have been developed for the wildlife activities. • Distribute the SOPs for Skirting and Building Monitoring for review. • Clarify if ECCC was met for waterbird monitoring program. • Include methods for regional bird monitoring. • Clarify if the Wildlife Monitoring Training Program has been developed. • Clarify if testing of human observers and tower camera have been completed for the caribou monitoring. • Clarify if parties agreed to delayed updates on regional ZOI monitoring. 	<ul style="list-style-type: none"> • Most SOPs have been developed and remaining ones will be in 2024. • The building skirting SOP was provided. • No bird monitoring was shared with ECCC yet as the scheduled monitoring is set in 2024 or 2025. • The methods about regional monitoring will be provided to KIA when available. • The training program has been focused on the content and is conducted by ERM biologist and B2Gold staff. The program will be reviewed in 2023. • B2Gold has chosen human observation and there is no camera program to compare to. • The next update of the plan will include this information regarding data from the GNWT.
<p>KIA-NIRB-03</p> <ul style="list-style-type: none"> • To explain why 4 out of 5 vessels during shipping season did not complete a marine wildlife survey. • To investigate causes not complying with the Marine Shipping Wildlife Mitigation and Monitoring Standard of Procedures (SOP) and to provide solutions. • To consider additional training for vessels operators. 	<ul style="list-style-type: none"> • B2Gold had conversation with vessels about wildlife sightings, although four (4) ships did not record any sightings. This requirement for shippers will be reinforced. • Will follow-up with vessels operators to discuss why no recording was made. • B2Gold had multiples discussion with operators and received confirmation compliance on their end for the 2023 season.
<p>KIA-NIRB-04</p> <ul style="list-style-type: none"> • To ensure vessels operators understand the Marine Shipping Mitigation and Monitoring (MSMM) SOP is intended for moving vessels and to clarify within the SOP. • Confirm the seals observed and if mitigations actions were necessary. 	<ul style="list-style-type: none"> • B2Gold will clarify with the operator that observations are meant to be when the vessel is moving, and it is clarified within the SOP. • The seal was observed less than 100 metres (m) while the vessel was anchored.
<p>KIA-NIRB-05</p> <ul style="list-style-type: none"> • To revise the marine mammal and seabird survey forms. 	<ul style="list-style-type: none"> • The survey forms will be reviewed, updated, and simplified.
<p>KIA-NIRB-06</p>	<ul style="list-style-type: none"> • This site will be added to the next iteration of

Comment/Recommendation	B2Gold Response
<ul style="list-style-type: none"> • Include NT Site 7 – Harrowby within the sensitive habitat figure and to consider adding the other identified. • To describe how the sensitive habitat for marine mammals was created and consider updating it. • Clarify is vessels operators submitted their shipping route. 	<p>the SOP.</p> <ul style="list-style-type: none"> • B2Gold will review how the sensitive habitat was created and revise if any errors. • Vessels companies do not provide their vessel tracks.
<p>KIA-NIRB-07</p> <ul style="list-style-type: none"> • Clarify the discrepancy in habitat loss calculation for the Marine Laydown Area (MLA) Property. 	<ul style="list-style-type: none"> • The Saltwater habitat from the non-vegetated ecosystems was not being considered in the WMMP report from 2021 and 2022.
<p>KIA-NIRB-08</p> <ul style="list-style-type: none"> • To explain how the flight tracking maps were produced and how conclusions were reached about flights. • To consider creating flight heat maps with a different approach. • Provide summary of statistics of helicopter flight below 610 meters. 	<ul style="list-style-type: none"> • The flight tracking maps uses points to calculate the heat maps since the amount of time in a particular area is indicative of disturbance at that location. • B2Gold will review how the helicopter flight data is presented and update the analysis considered KIA’s comment.
<p>KIA-NIRB-09</p> <ul style="list-style-type: none"> • Clarify the discrepancies in wolverine observation and deterrence reporting. • Clarify if Red-level responses were implemented when wolverines were less than a kilometer from site. • To compare wolverine incidents with previous years. • Provide detail on what could possibly attract wolverines to the incinerator. 	<ul style="list-style-type: none"> • B2Gold acknowledges the discrepancy for observations. Future reporting will make sure to clearly report observation and deterrent. • B2Gold did remind staff about the importance of cleanliness around potential attractants. Additional maintenance was done on the incinerator and two (2) wolverines were destroyed due to habituated behaviour which will be reported in detail in the 2023 WMMP Report.
<p>KIA-NIRB-10</p> <ul style="list-style-type: none"> • Provide rational on the facilities camera monitoring program in 2022 and detail on the 2023 program. • Provide details on measures taken to ensure continuous camera operation. • Clarify when the on-site camera monitoring program is supposed to occur. 	<ul style="list-style-type: none"> • Cameras were placed at facilities that could act as attractants and in 2023 and these cameras will be place year-round. • To ensure winter operations of these cameras, they will use Energizer Ultimate Lithium batteries with more frequent check up during winter. • The on-site camera monitoring program will be in place during construction and operations of the Project at similar locations

Comment/Recommendation	B2Gold Response
	as 2022.
KIA-NIRB-11 <ul style="list-style-type: none"> To revise Wildlife Deterrent SOP to include red fox and the waste management to include additional measures on wildlife attraction. To ensure staff are trained on wildlife measures. 	<ul style="list-style-type: none"> The next revised Wildlife Deterrent SOP will include fox. The camp onboarding program includes training on wildlife awareness.
KIA-NIRB-12 <ul style="list-style-type: none"> Provide detailed methods and results for the 2022 spring bird migration baseline surveys and to explain why these surveys were not described in the WMMP report. 	<ul style="list-style-type: none"> B2Gold included the baseline summary for migratory bird surveys for the FEIS Addendum for KIA's review. These surveys are not described in the WMMP Report as they were conducted for the modification of the proposed wind turbine. It is not part of the WMMP.
KIA-NIRB-13 <ul style="list-style-type: none"> Clarify which areas constructed in 2022 were cleared during bird nesting at Echo Pit. To confirm pre-clearing surveys were performed. 	<ul style="list-style-type: none"> B2Gold confirms that the areas were cleared during the bird nesting period. It is confirmed that pre-clearing surveys were performed at the Marine Laydown Area (MLA) and at Goose and Echo Pits.
KIA-NIRB-14 <ul style="list-style-type: none"> To present the most conservative territorial status for wildlife species at risk. To update all documents with the most up-to-date information for species, status, and known/potential occurrence at the Project. 	<ul style="list-style-type: none"> B2Gold will make sure to present the most conservative territorial status for species at risk. B2Gold will make sure to update the document annually with the most up-to-date information for species.
KIA-NIRB-15 <ul style="list-style-type: none"> To expand on the list of observed wildlife in the Marine Shipping Wildlife Mitigation and Monitoring SOP. To revise the Incidental Wildlife Observations SOP. 	<ul style="list-style-type: none"> B2Gold will review and update, if necessary, the list of observed wildlife. The Incidental Sighting SOP will be reviewed.
KIA-NIRB-16 <ul style="list-style-type: none"> To investigate and correct date discrepancies for incidental wildlife observation and to note corrective actions under ISO 9001. 	<ul style="list-style-type: none"> B2Gold will review all incidental sightings and ensure these errors do not occur in the 2023 report.

Comment/Recommendation	B2Gold Response
<p>KIA-NIRB-17</p> <ul style="list-style-type: none"> Following the wildlife incident reported on November 8, 2022, to implement Prevention Actions noted in the report and distribute the Wildlife Management SOP to interested parties. 	<ul style="list-style-type: none"> Prevention actions recommended in the report such as placing screening over the building air intake was conducted. The Wildlife Management SOP is the Wildlife Deterrence SOP.
<p>KIA-NIRB-18</p> <ul style="list-style-type: none"> Clarify if the Winter Ice Road (WIR) alignment will change every year and new vegetation plots will be established. To consider keeping previous monitoring plots due to future WIR realignments. If continuous plots are needed, to explain the long-term monitoring according to the Vegetation Monitoring Plan for WIR monitoring, can be developed, with sufficient data for trend analyses. Clarify if new plots are still paired and explain how these paired treatments can be compared if one set of data is from 2022 and the other from 2019. To consider all vegetation plots in future years to ensure that data are comparable at the subsequent monitoring period. 	<ul style="list-style-type: none"> The WIR is not expected to change alignment every year, as best practice it was decided to create new vegetation monitoring plots. Existing plots will continue to be monitored over the life of the Project. Not all new plots are in paired. The objective of paired plots is to evaluate the effects on specific vegetation and some pairs will have missing data but will have multiple years data. The next monitoring will monitor each of the experimental and reference plots that were established in 2019 and 2022.
<p>KIA-NIRB-19</p> <ul style="list-style-type: none"> Correct discrepancy and clarify the vegetation plot BRR006Ea without a suitable paired reference, is one going to be identified or how will data be compared. 	<ul style="list-style-type: none"> It was noted that tundra seepage vegetation association was not described in the Vegetation Baseline Report or the FEIS. Therefore, B2Gold has reclassified the plot as tussock meadow. Going forward, paired plots BRR040Ea and BRR040R will be classified as tussock meadow.
<p>KIA-NIRB-20</p> <ul style="list-style-type: none"> To confirm if B2Gold is planning to include rare plants listed by the federal and territorial species of conservation of concern. To confirm vegetation species if <i>Polytrichum commune</i> (common haircap 	<ul style="list-style-type: none"> Losses of special landscape features are tracked annually to help reduce the overall impact to rare plants. The species identified can be difficult to accurately identify, future investigation will be necessary.

Comment/Recommendation	B2Gold Response
<p>moss) and <i>Tomentypnum falcifolium</i> (sickle-leaved golden moss) were correctly identified and discovered at the Back River Project and whether these species could be considered rare plants in Nunavut.</p>	
<p>KIA-NIRB-21</p> <ul style="list-style-type: none"> Clarify how vegetation is defined as a surface substrate and how it relates to other measurements of vascular plants. Clarify if decaying wood and wildlife sign were observed in monitoring plots and wildlife sign (as a separate data collection component) were assessed and observed on the new 2022 monitoring plots. Please consider the usefulness of including decaying wood as a surface substrate in the Arctic tundra environment. 	<ul style="list-style-type: none"> Table 5 of Appendix E, <i>2022 Vegetation Monitoring Filed Program</i> results contained an error, the surface substrate percentage of vegetation is presented in the Table (see B2Gold's response). Decaying wood has not been observed, but animal pellets have been.
<p>KIA-NIRB-22</p> <ul style="list-style-type: none"> To correct the discrepancy in raptor nesting between the Pre-blasting Survey SOP and the WMMP Plan and consider extending the raptor nesting window in the WMMP Plan to be from April 1 to August 31. Clarify the trigger number for animals and consider calving and post-calving for open pit blasting. Provide rationale for the 2.5 km setback distance for blasting and confirm that larger blasts will not be used for the Project. 	<ul style="list-style-type: none"> B2Gold will review the discrepancy. B2Gold will revise the numbers to ensure triggers are clear and calving is considered. The blasting for open pits is typically bigger than quarries which has a 5 km setback during calving. Mitigation for smaller quarry is based on noise level, it is why for operational use a distance of 2.5 km, half the calving period setback.
<p>KIA-NIRB-23</p> <ul style="list-style-type: none"> To revise the Pre-blasting Survey Datasheet and Wildlife Monitoring and Mitigation for Blasting SOP where appropriate. 	<ul style="list-style-type: none"> B2Gold will review and update the blasting SOP.
<p>KIA-NIRB-24</p>	<ul style="list-style-type: none"> B2Gold commits to include a summary in the

Comment/Recommendation	B2Gold Response
<ul style="list-style-type: none"> • Include a summary of response to each issue raised by regulator during their inspections. 	<p>Annual Report to each of the issues raised by regulators during inspection.</p>
<p>KIA-NIRB-25</p> <ul style="list-style-type: none"> • To describe the climate data collected at the Lupin A station including what factors were considered when comparing conditions at the Goose station. 	<ul style="list-style-type: none"> • The date is the most applicable climate date to make comparisons with observed data at Goose station.
<p>KIA-NIRB-26</p> <ul style="list-style-type: none"> • To indicate if geotechnical inspection report evaluation of project impacts on the continuous permafrost incorporates climate warming predicted (and observed) influence anticipated thermal erosion. 	<ul style="list-style-type: none"> • Yes, the report accounted for climate change in the region and the associated thermal impacts.
<p>KIA-NIRB-27</p> <ul style="list-style-type: none"> • To indicate when an assessment will be conducted to determine if additional culverts or drainage measures are required at Goose Neck. 	<ul style="list-style-type: none"> • B2Gold will provide the information as part of the 2023 Annual Report.
<p>KIA-NIRB-28</p> <ul style="list-style-type: none"> • To explain what procedures have been implemented to ensure gaps in vessel marine monitoring will be avoided. 	<ul style="list-style-type: none"> • B2Gold had conversation with vessels about wildlife sightings, although four ships did not record any sightings. This requirement for shippers will be reinforced. • Will follow-up with vessels operators to determine why no recordings were made. • B2Gold had multiples discussions with operators and received confirmation compliance on their end for the 2023 season.
<p>KIA-NIRB-29</p> <ul style="list-style-type: none"> • To ensure vessel crew members are trained in the importance of providing detailed records of marine wildlife. 	
<p>KIA-NIRB-30</p> <ul style="list-style-type: none"> • To identify a minimum setback distance to separate construction activity from known seal lairs and protect seals from disturbance during the reproductive period. 	<ul style="list-style-type: none"> • The minimum setback is 50 meters.
<p>KIA-NIRB-31</p> <ul style="list-style-type: none"> • Include impact of climate change into spill modelling and discuss how it is expected to affect spill dispersion. 	<ul style="list-style-type: none"> • B2Gold commits to incorporate the impact of climate change considerations in the 2023 Annual Report.

Comment/Recommendation	B2Gold Response
KIA-NIRB-32 <ul style="list-style-type: none"> To identify what constitute an increase in wind and ice or visibility conditions which would stop fuel transfer. 	<ul style="list-style-type: none"> B2Gold commits to include the revision of the OPEP in the 2023 Annual Report.
KIA-NIRB-33 <ul style="list-style-type: none"> To explain how phytoplankton sampling issues will be avoided in the future and how the reduced sampling could affect interpreting results. 	<ul style="list-style-type: none"> No filters issues occurred during the April 2023 program, and it is anticipated that the same filter will be used. It is not likely that the reduced sampling rate affected the results.
KIA-NIRB-34 <ul style="list-style-type: none"> Clarify the range of chlorophyll samples collected at the MLA stations and not a “general” range. 	<ul style="list-style-type: none"> The range of chlorophyll concentrations range from a mean low of 0.142 ug/L to a mean high of 0.270 ug/L.
KIA-NIRB-35 <ul style="list-style-type: none"> To perform a stream flow study to determine if the rock weir will maintain an allowable threshold for Arctic grayling under all expected spring flow conditions. 	<ul style="list-style-type: none"> B2Gold thinks that no additional desktop stream flow study is required to determine if the rock weir will maintain an allowable threshold. B2Gold will monitor for up to 6 years if the rock weir mitigation is functioning.
KIA-NIRB-36 <ul style="list-style-type: none"> Provide diversion channel designs at Rascal Streams and any flow modelling. 	<ul style="list-style-type: none"> The design is provided as Attachment A of B2Gold’s Response Document.
KIA-NIRB-37 <ul style="list-style-type: none"> Provide information on the saline discharge rate to the marine environment. 	<ul style="list-style-type: none"> The average rate of discharge is 2-3 m³ per day.
KIA-NIRB-38 <ul style="list-style-type: none"> Indicate the type of water (saline or fresh), the amount, the quality, and the discharge point. 	<ul style="list-style-type: none"> Minimal inflows were experienced at the underground ramp during freshet and no saline water has been experienced during the development of the ramp.
KIA-NIRB-39 <ul style="list-style-type: none"> Include the evaluation of water quality and quantity circulating within the infill geotechnical material and its effect (in terms of thermal alteration) on the permafrost should be included in the annual report and submitted to the Nunavut Impact Review Board. 	<ul style="list-style-type: none"> It is not in B2Gold’s current mine plan to have a Tailings Storage Facility, if it will, B2Gold will submit engineering report as the Type A water license.
KIA-NIRB-40 <ul style="list-style-type: none"> To ensure procedures are developed for 	<ul style="list-style-type: none"> The blasting plan with mitigation measures to avoid impacts on fish is a requirement as the

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corrective actions in case of increase of Nitrate (NO ₃) or Ammonia (NH ₄) in groundwater.	Term and Condition 25.
KIA-NIRB-41 <ul style="list-style-type: none"> Provide updated data on the ground temperatures as part of the geotechnical inspection report. 	<ul style="list-style-type: none"> B2Gold will provide an update on the ground temperature as part of the 2023 Annual Geotechnical Inspection. A series of ground temperature cables have been installed in 2023.
KIA-NIRB-42 <ul style="list-style-type: none"> Provide information of mitigation measures to increase Inuit employment, close wage gap and decrease turn-over. KIA strongly supports career development plans for every Inuit employee as a commitment and expects the plans to be in place within 2 years, and to be renewed and updated regularly. 	<ul style="list-style-type: none"> Currently working with a Inuit-led organization to develop a comprehensive and culturally relevant Inuit employee support program. Construction of a new camp with improved accommodations. Career development plans for Inuit employees. B2Gold re-engages qualified Inuit employees who have worked at the project.
KIA-NIRB-43 <ul style="list-style-type: none"> To describe what measures are in place to ensure Inuit are trained in transferrable skills to increase the Kitikmeot Inuit Labor force. 	<ul style="list-style-type: none"> As the Project gets closer to operation, additional employment and training initiative will be introduced. A list of transferable skills will grow over time as well. B2Gold is also looking to secure partnerships to develop projects in the Kitikmeot communities funded through the IIBA.
KIA-NIRB-44 <ul style="list-style-type: none"> To describe actions taken to increase the amount trained Inuit into supervisory positions and transferable skills. 	<ul style="list-style-type: none"> On site trainers will be hired to increase training capacity. A mentorship program is currently being developed.
KIA-NIRB-45 <ul style="list-style-type: none"> KIA recommends B2Gold to training of transferable skills for Inuit. 	<ul style="list-style-type: none"> B2Gold will develop an Inuit Training Plan to help guide activities. An initial version should be available to parties by March 2024.
KIA-NIRB-46 <ul style="list-style-type: none"> Clarify B2Gold's plan on financial literacy, planning and personal budget training. 	<ul style="list-style-type: none"> B2Gold commits in the development of its Inuit Employee Support Program which will contain financial literacy.
Government of Nunavut	
GN AR-#01 <ul style="list-style-type: none"> GN recommends that the Proponent should refrain to draw conclusions about 	<ul style="list-style-type: none"> B2Gold agrees and text will be more specific. The analysis of collar data in the FEIS indicated that the Goose site did not overlap

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caribou range without sufficient data.	the calving range of Bathurst or Beverly/Ahiak caribou and no observations during the calving period is consistent with that conclusion but cannot be used alone to determine herd overlaps. As noted by the reviewer, as the project moves into Construction the monitoring programs will ramp up and more data will be available to draw conclusions on. B2Gold looks forward to collaborating with the GN on these monitoring programs whenever possible.
GN AR-#02 <ul style="list-style-type: none"> Provide detail on the wildlife incinerator incident and actions taken following this incident. 	<ul style="list-style-type: none"> B2Gold has camp inspections, waste inspections and camp hardening to address this issue. B2Gold will use the report from the generator shack incident as a standard for any future incident reports with clear outcomes, recommendations, and record of their completion.
GN AR-#03 <ul style="list-style-type: none"> Clarify why monitoring vegetation site established in 2018/2019 were not evaluated in 2022 and only new plots around the WIR realignment were considered in the fieldwork. To ensure photographic monitoring of all plots as per the Vegetation Monitoring Field Program. 	<ul style="list-style-type: none"> The WIR was not constructed every year since 2018 and that is why vegetation monitoring has not been completed. Monitoring in 2024, will evaluate previous plots. Photos are provided in B2Gold's response document and photos will be taken in 2023 and provided in the annual report.
GN AR-#04 <ul style="list-style-type: none"> Could the Proponent report all spills, regardless of volume in future annual reports. The GN commends the Proponent for switching to propylene glycol within equipment to eliminate the risks to wildlife associated with ethylene glycol. 	<ul style="list-style-type: none"> B2Gold will provide information regarding all spills in future annual reports.
GN AR-#05 <ul style="list-style-type: none"> Clarify dust suppression activities in 2022 and the approach that will be applied in 2023 before the Fugitive Dust Reduction Plan (FDRP) and Air Quality 	<ul style="list-style-type: none"> B2Gold will provide information in the 2023 annual report.

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<p>Mitigation and Monitoring Program (AQMMP) are updated.</p> <ul style="list-style-type: none"> • Provide additional detail on suppression methods, frequency and triggers used to initiate dust suppression efforts. 	
<p>GN AR-#06</p> <ul style="list-style-type: none"> • Provide blasting activity specific dates. • To report dates the Caribou Management System levels were triggered. • The GN recognizes the efforts of the proponent to mitigate the impacts of Project activity on caribou, muskox, and other wildlife in the Project area and recommends these changes to better demonstrate that effort. 	<ul style="list-style-type: none"> • B2Gold agrees that sharing data that show caribou observations, mitigation measures and normal operation are an important aspect of the WMMP report. For the 2023 wildlife report, B2Gold will report all those data that are available. If specific dates are not available, B2Gold will ensure that these data are collected going forward.
<p>GN AR-#07</p> <ul style="list-style-type: none"> • To collect traffic data during construction and operation of the Winter Ice Road. 	<ul style="list-style-type: none"> • For the 2023 wildlife report, B2Gold will report all requested data that are available. If information is not available, it will be collected going forward.
<p>GN AR-#08</p> <ul style="list-style-type: none"> • To apply a 610 m above ground level flight level when possible. • To adjust the flight map legend (Fig. 5.1-1 and 5.1-2) in the WMMP report. • To explain how caribou are surveyed prior to drill moves. 	<ul style="list-style-type: none"> • B2Gold will review how helicopter data is presented and update the analysis and presentation.
Crown-Indigenous Relations and Northern Affairs Canada	
<p>CIRNAC #1</p> <ul style="list-style-type: none"> • Provide ground temperature and permafrost monitoring data for all construction in 2022 and all construction in future annual reports. • To confirm what parts of the project will be included in the 2023 Thermal Monitoring Plan. 	<ul style="list-style-type: none"> • B2Gold will provide ground temperature as part of the 2023 Annual Report. No ground temperature was collected from the tankfarm as it is constructed on the bedrock. As part of the site-wide thermal monitoring plans B2Gold will consider installing a GTC near (adjacent to) each of the tank farms. At the MLA access to a drill is currently limited, thus installation of a GTC at that location would be a secondary priority and may be delayed until appropriate equipment is in the area. • At the time of this response, 2023 GTCs have

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	<p>been installed at the Primary Pond area and at the Goose Camp Pad. Measurements from these cables will be included in the 2023 AGI report.</p> <ul style="list-style-type: none"> The monitoring will be around active construction or Project areas. The initial sites are expected to be: Primary Pond, Goose Camp, Goose Tankfarm (to be installed) and the future Echo Waste Rock Storage Area.
<p>CIRNAC #2</p> <ul style="list-style-type: none"> Monitor permafrost in developed and planned areas to establish baseline information and submit data as part of the annual reporting. To provide summary of ground temperature that has been reviewed in the 2022 Annual Geotechnical Inspection report. Confirm what parts of the Project Area will be included in the 2023 Thermal Monitoring Plan 	<ul style="list-style-type: none"> Permafrost monitoring has started at the Primary Pond and Goose Camp. The selection of additional sites for permafrost monitoring is currently in progress. B2Gold will provide an update on the ground temperature as part of the 2023 Annual Geotechnical Inspection. A series of ground temperature cables have been installed in 2023. Further reporting such as the Primary Pond As-built will be submitted 90 days post completion of construction as Primary Pond is partially constructed.
<p>CIRNAC #3</p> <ul style="list-style-type: none"> To provide results or status updates on the geotechnical investigations in 2021 and subsequent investigations in the 2023 annual report. 	<ul style="list-style-type: none"> The 2021 geotechnical drilling was done at the Primary Pond and Umwelt Dam locations. Attachment E of B2Gold's response presents an overview of the results. Geotechnical investigations (including geotechnical investigations at Goose camp and plant pads and at the MLA Tankfarm) have been completed in 2023 and will be part of the 2023 Annual Report.
<p>CIRNAC #4</p> <ul style="list-style-type: none"> Provide a timeline for the anticipated submission of the updated <i>Landfill and Waste Management Plan</i> and discuss how permafrost will be impacted and mitigated. 	<ul style="list-style-type: none"> This is an ongoing process with the Nunavut Water Board (NWB) and the permafrost integrity is discussed in the updated management plan.
<p>CIRNAC #5</p> <ul style="list-style-type: none"> Clarify which materials can be stored indoors as opposed to lined containment 	<ul style="list-style-type: none"> B2Gold commits to provide this information in the 2023 Annual Report.

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<p>facilities.</p> <ul style="list-style-type: none"> Update the Standard of Procedure for separating waste materials while the Camp Manager performs the waste consolidation. 	
<p>CIRNAC #6</p> <ul style="list-style-type: none"> To provide results of the infill geotechnical characterization and required mitigation measure should construction of the Tailings Storage Facility Dam resume. 	<ul style="list-style-type: none"> Results will be provided in the Annual Report if the construction of the Tailings Storage Facility Dam resume.
<p>CIRNAC #7</p> <ul style="list-style-type: none"> Explain the rationale for discontinuing Hydrology Baseline Reports. Resume the Baseline Reports where construction has not started. Discuss hydrology data collection. To provide the updated groundwater modelling information. 	<ul style="list-style-type: none"> B2Gold has collected hydrometric data within the Goose Lake watershed in 2021 to 2023. It has been completed from 2021 to 2023 and will continue in subsequent years. Discussion of hydrology data collection will be part of future annual reports. The groundwater modeling was completed in 2022 and provide to the NWB.
<p>CIRNAC #8</p> <ul style="list-style-type: none"> Summarize 2021 the aquatic effects data collection results. Include any updated <i>Aquatic Effects Management Plan</i> in future annual reports. 	<ul style="list-style-type: none"> The 2021 <i>Aquatic Baseline Report</i> was omitted for the 2021 Annual Report, but the 2022 Report was included in the 2022 Annual Report. The data in 2021 and 2022 was collected to address commitments made in response to NWB technical review of the Aquatic Baseline Synthesis report to support the updated to the AEMP and will be used in future AEMPs. The updated plan will be submitted to NWB prior for approval 90 days prior to the start of construction (as per the Type A Water Licence and Project Certificate Term and Condition 21) and the summary of results will be reported as required.
<p>CIRNAC #9</p> <ul style="list-style-type: none"> To Provide a timeline for an updated <i>Vegetation Monitoring Plan</i>. Clarify if 2022 invasive species monitoring was limited to the ten new 	<ul style="list-style-type: none"> The plan has not been updated but the 2022 Annual Report included a commitment regarding a schedule of closure and post-closure monitoring. As per the 2020 Vegetation Monitoring

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<p>vegetation monitoring plots.</p> <ul style="list-style-type: none"> • To provide ground-level photo of all monitoring plots and a detailed schedule by calendar year for all plant-related survey requirement. • Clarify how unknown graminoid species were detected in 2022 considered non-invasive. 	<p>Program, Non-native plant monitoring is to occur every three (3) years and the 10 new plots established were to capture occurrence of non-native plant species.</p> <ul style="list-style-type: none"> • Photos provided in B2Gold's response document. • No non-native species observed in 2022.
<p>CIRNAC #10</p> <ul style="list-style-type: none"> • To provide a progressive revegetation program and any results in future annual reports This shall be provided in the 2023 annual report to the NIRB to meet PC T&C #36, which requires submission of this information within three years from the 2020 commencement of construction. 	<ul style="list-style-type: none"> • The information will be provided in the 2023.
<p>CIRNAC #11</p> <ul style="list-style-type: none"> • Summarize the 2021 marine sampling results and to include the annual <i>Aquatic Effects Management Plan</i> in future annual reports. 	<ul style="list-style-type: none"> • The results will be summarized and included in the 2023 annual report.
<p>CIRNAC #12</p> <ul style="list-style-type: none"> • Provide the updated version of the Tailings Management Plan in future annual reports. 	<ul style="list-style-type: none"> • Once approved by the NWB, it will be provided to the NIRB.
<p>CIRNAC #13</p> <ul style="list-style-type: none"> • Provide a summary of water results of the 2021 data collection. • To conduct sampling of streams during open water to prevent future data gaps. • To conduct lessons learned to avoid errors and data gaps. • Resample at the reference B Lake for the concentration of chromium. • Provide the rationale for the selection of water quality guidelines. 	<ul style="list-style-type: none"> • The 2021 Aquatic Baseline Report will be provided in the next annual report. • Samples were collected a few weeks after spring melt, so open-water season sampling was collected in 2021 and 2022. • Updated instructions and mitigation measures will be provided to field crew during each programs pre-field meeting to avoid errors. • Five (5) samples were collected, and one sample came with a high concentration and is suggesting a laboratory error, and this concentration is not considered representative of Reference B Lake. The 4

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	<p>remaining samples and the available baseline data from previous years provide sufficient information on total chromium concentrations thus re-sampling is not planned.</p> <ul style="list-style-type: none"> • Comparison of water quality data to drinking water guidelines is commonly done for waterbodies that are or could potentially be a drinking water source. Comparison to drinking water guidelines is used to evaluate suitability of water as a drinking water source for people and wildlife. It is a common practice for waterbodies, the selection of the quality guidelines and benchmarks is detailed in the <i>Aquatic Effect Monitoring Plan</i>.
<p>CIRNAC #14</p> <ul style="list-style-type: none"> • Append detailed spills reports to the Annual Report. • Use consistent units when discussing spill events. • Clarify wording of contaminated soil treatment and disposal. 	<ul style="list-style-type: none"> • B2Gold will incorporate those comments into future annual reports.
Transport Canada	
<p>TC-1</p> <ul style="list-style-type: none"> • Complete the annual reviews and update, if necessary, of the Project's <i>Oil Pollution Emergency Plan</i> (OPEP) and <i>Oil Pollution Prevention Plan</i> (OPPP). If updated the plans must be submitted to Transport Canada and in future annual reports. • TC provided information regarding Marine Safety and Security 	<ul style="list-style-type: none"> • B2Gold will continue to include an updated OPEP and OPPP in annual reports. • In regard to the Marine Transportation Security Act and Regulations prior to interfacing with a foreign flagged vessel or a Canadian flagged vessel on an international voyage, B2Gold is currently communicating with Transport Canada.
<p>TC-2</p> <ul style="list-style-type: none"> • Provide information and copies of documents regarding the transportation of dangerous goods. 	<ul style="list-style-type: none"> • Documents have been sent to the Nunavut Water Board, but it can be provided in future annual reports submitted to the NIRB.
Fisheries and Oceans Canada	
<p>DFO #1</p> <ul style="list-style-type: none"> • To send a Request for Review for the Shoreline Pad Expansion prior to 	<ul style="list-style-type: none"> • B2Gold acknowledges the request and will submit a request for application when the shoreline pad is expanded.

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construction.	
DFO #2 <ul style="list-style-type: none"> Confirm that culverts G15, G21 and G23 are not located in fish-bearing. 	<ul style="list-style-type: none"> The crossings G15, G21 and G23 are not located at a watercourse or near known fish-bearing locations. The crossings are designed to convey surficial flows over land during wetted periods of the open water season.
DFO #3 <ul style="list-style-type: none"> Provide details on mitigation measures undertaken following sightings of marine mammals. 	<ul style="list-style-type: none"> No answer was provided by B2Gold.
DFO #4 <ul style="list-style-type: none"> DFO suggest to monitor underwater noise. 	<ul style="list-style-type: none"> No answer was provided by B2Gold.
Environment and Climate Change Canada	
ECCC #1 <ul style="list-style-type: none"> Request a timeline on resolution on the air quality monitoring challenges before maximum construction intensity. If monitoring detects greater impacts, to provide mitigation measures. 	<ul style="list-style-type: none"> The challenges identified during the 2022 monitoring were addressed before the 2023 air quality monitoring. The 2023 air quality monitoring program consists of passive NO2 sampling and dustfall sampling. The passive NO2 and dustfall samples are collected monthly and shipped to an external laboratory for analyses. Laboratory results will be analyzed at the completion of the 2023 air quality monitoring program, which will include comparisons to applicable standards. If exceedances to the applicable standards occurred during the 2023 air quality monitoring program, an appropriate mitigation response will be drafted and communicated.
ECCC #2 <ul style="list-style-type: none"> To explain how Potentially Acid Generating rock identified is managed that was used in construction. 	<ul style="list-style-type: none"> All Potential Acid Generating rock will be placed in the WRSA as per the Waste Rock Management Plan submitted to the NWB.
ECCC #3 <ul style="list-style-type: none"> Reminder that the above ground fuel storage tanks would be subject to ECCC's Environmental Emergency regulations for Diesel fuel and/or gasoline. And that it is anticipated that Back River is moving towards becoming an active mine and becoming subject to MDMER 	<ul style="list-style-type: none"> The Project is registered under the Environmental Emergency Regulations for both Diesel and Ammonium Nitrate. And agree that the project will become subject to the MDMER when triggered.

1.6 NIRB's Review

The NIRB has reviewed Sabina's 2022 *Annual Report* and provided the following comments.

- Related to Administrative Term and Condition No. 12, the Proponent should have available all non-confidential documents related to the Back River Project on their website and/or portal. As B2Gold does not have this on their website and/or does not have a portal, the Monitoring Officer requires B2Gold to create a registry to make relevant documentation available. Further, the NIRB reminds B2Gold that all plans related to the Project should be available as stand-alone documents and not remain as part of the annual report they were submitted.
- Term and Condition No.2: NIRB staff expect that B2Gold will remediate the logistic issue that prevented analysis of the air quality for the next annual report.
- Term and Condition No.6: The Monitoring Officer could not locate the baseline emissions as predicted by the Proponent prior to development. To provide to information in the next annual report.
- Terms and Conditions Nos. 9 to 12: NIRB staff understand that B2Gold has started monitoring and except results in the next annul report.
- Term and Condition No. 30: B2Gold notes that the *Back River Project Rascal Stream West Culvert and the Back River Project Early Works* were submitted to 2022 and 2018. the Monitoring Officer cannot locate those documents and requests clarification on whether these documents were submitted to NIRB and the NIRB Document ID Number(s).
- Term and Condition No. 46: B2Gold reported that to wildlife mortalities occurred in 2022 although two (2) wolverines were destroyed. The Monitoring Officer would like to understand why those wolverines were not considered as part of wildlife mortalities.
- Term and Condition No. 78: NIRB staff could not locate the document *Guidance for incorporating Community Perspectives and Traditional Knowledge* within the *Socio-Economic Monitoring Plan*. To clarify the location of the document.
- Term and Condition No. 87: The Proponent is required to send the Site Orientation Plan to the Nunavut Impact Review Board. Staff required B2Gold to send this plan.

SITE VISIT AND PUBLIC INFORMATION SESSION

As part of the monitoring of the Project and in accordance with NIRB's monitoring program, the NIRB shall conduct a site visit and a public information session.

The Monitoring Officer was unable to conduct a site visit of the Back River project. The Monitoring Officer attempted twice to go to site. The first attempt was on July 11, 2023, but due to a mechanical issue the flight was canceled. The second attempt was on August 30, 2023, but due to the wildfire evacuation in Yellowknife the flight was canceled. The be able to have an update of the site, the monitoring officer shared a list of key points to the Proponent to have an update of the site. The site update visit report was released on October 10, 2023, (Public Registry ID No. 347338).

On September 14, 2023, the NIRB held an afternoon open house and an evening community information session at the Luke Novoligak Community Hall in Cambridge Bay, Nunavut to update, discuss, and

receive feedback from community members on the NIRB's monitoring program for the Back River Project. In total, four (4) community members attended the meeting, one (1) in the afternoon and three (3) in the evening. No question or comments related to the project were shared during the session.

FINDINGS

The objectives of the NIRB's monitoring program as indicated in Section 12.7.2 of the *Nunavut Agreement* and s. 135 of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*) include:

- a) To measure the relevant effects of projects on the ecosystemic and socio-economic environments of the Nunavut Settlement Area;
- b) To determine whether and to what extent the land or resource use in question is carried out within the predetermined terms and conditions;
- c) To provide the information base necessary for agencies to enforce terms and conditions of land or resource use approvals; and
- d) To assess the accuracy of the predictions contained in the project impact statements.

As discussed previously, B2Gold has demonstrated compliance with most of the reporting requirements as contained in the Project Certificate, and as applicable to the current phase of the project; however, the Board requires additional information on ongoing discussion about caribou. The Board Recommendation is regarding the Caribou Technical Advisory Group.

Outstanding Reporting on the Caribou Technical Advisory Group

As stated in Term and Condition No. 51 the Proponent is to provide information in the Annual Report for the Project and the associated commentary states "The Proponent also commits to taking advice from the Caribou Technical Advisory Group into consideration when carrying out these tasks."

The information discussed by Sabina in the 2022 Annual Report regarding this Term and Condition is that the Caribou Technical Advisory Group met in December 2022 to discuss updates to the Back River Project and that results of monitoring and plans would be included in next years annual report. B2Gold also referred Readers to its Wildlife Mitigation and Monitoring Program Plan section 3.2 for information on the Term and Condition. This Plan states "B2Gold will provide a report to NIRB on B2Gold's testing and evaluation of the Project management measures and the report will include responses to any recommendations made by the Caribou Technical Advisory Group."

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

It is important that a summary of key issues or items discussed during those meetings and how they were resolved, or are being discussed further for resolution, could increase understanding of the management of caribou around the Back River Project. Further, considering the overall concern on caribou from

community members during the Community Roundtable of the Back River Project Energy Centre Proposal, reporting about the Caribou Technical Advisory Group seems essential to respond to concerns as well as future discussions regarding the Back River Project. The Board has recommended that B2Gold report on the key points and/or advice discussed by the Caribou Technical Advisory Group, and if advice was not incorporated the rationale for not incorporating it within 45 days.

CONCLUSION

B2Gold has increased its activities at the Back River Project and has made efforts to work towards compliance with the Terms and Conditions of the Project Certificate. As the Project progresses, NIRB expects further monitoring activities to confirm predictions as committed in the Final Environmental Impact Statement by the Proponent. Pursuant to sections 12.7.2 and 12.7.3 of the *Nunavut Agreement*, the NIRB will continue to work with B2Gold and other Authorizing Agencies to conduct and coordinate monitoring efforts, and to review results and Project compliance in accordance with the requirements set out in the Back River Project Certificate No. 007.

Prepared by: Guillaume Daoust

Title: Technical Advisor II

Date: December 11, 2023

Signature:



Reviewed by: Kelli Gillard PAg, CTAJ

Title: Manager, Project Monitoring

Date: December 11, 2023

Signature:



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

Board Guidance on General Regulatory and Administrative Responsibilities

<u>Term & Condition</u>	<u>Reporting Requirements</u>	<u>Compliance Achievement</u> <u>2021</u>	<u>Compliance Achievement</u> <u>2022</u>	<u>NIRB Comment</u>
General Regulatory Requirements				
1. Appointment of Monitoring Officer(s)	When a new monitoring officer is assigned	Active In Compliance	Active In Compliance	Completed by NIRB.
2. NIRB to report annually on the monitoring program (in English, Inuinnaqtun, and Inuktitut)	Annually	Active In Compliance	Active In Compliance	Completed by NIRB.
3. NIRB to conduct periodic community meetings updates regarding its Monitoring Program	n/a	Active In Compliance	Active In Compliance	Completed by NIRB.
4. NIRB to schedule periodic site inspections.	n/a	Active In Compliance	Active Non-compliance	The NIRB scheduled 2 (two) site visits, but both were canceled due to mechanical and emergency evacuation in Yellowknife.

<u>Term & Condition</u>	<u>Reporting Requirements</u>	<u>Compliance Achievement</u> <u>2021</u>	<u>Compliance Achievement</u> <u>2022</u>	<u>NIRB Comment</u>
5. Proponent must obtain all required federal and territorial permits and other approvals and shall comply with the requirements of such regulatory instruments.	n/a	Active In Compliance	Active In Compliance	The Proponent has the permits it requires for the level of construction it is currently conducting.
6. Duty to Comply with environmental laws and regulations and/or regulatory instruments, prompt action to remedy non-compliance and report any non-compliance.	Annually	Active In Compliance	Active In Compliance	Incidents were reported as required and no actions were taken by Regulatory Authorities.
7. Posting of adequate performance bonding.	n/a	Active In Compliance	Active In Compliance	
Monitoring Records				
8. Information requirements for monitoring reporting.	Annually	Active In Compliance	Active In compliance	
9. Make significant monitoring results and/or summaries of significant results available in English, Inuinnaqtun, and Inuktitut, to the extent feasible.	Annually	Active In Compliance	Active In Compliance	Only the executive summary is available in Inuinnaqtun and Inuktitut.

<u>Term & Condition</u>	<u>Reporting Requirements</u>	<u>Compliance Achievement</u> <u>2021</u>	<u>Compliance Achievement</u> <u>2022</u>	<u>NIRB Comment</u>
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.	n/a	Active In Compliance	Active In Compliance	
11. Maintenance of an up-to-date Environmental Impact Statement and the updated environmental monitoring programs developed for the Project as new information is collected.	Updated as indicated by new baseline data or monitoring results.	Active In Compliance	Active In Compliance	
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	n/a	Active Deficient	Active Deficient – In Progress	NIRB notes that no monitoring reports or management plans are available on B2Gold's website. The NIRB requests that the Proponent have a web portal dedicated to the filing of all non-confidential materials for the Back River project to be the central repository for the Project and to make it easier for individuals to locate all materials related to the project.

<u>Term & Condition</u>	<u>Reporting Requirements</u>	<u>Compliance Achievement</u> <u>2021</u>	<u>Compliance Achievement</u> <u>2022</u>	<u>NIRB Comment</u>
On-going Engagement in Project Monitoring, Modelling, Management and Reporting				
13. Provide on-going opportunities for consultation and comment on any substantive revisions to the Project-specific monitoring program, modelling, studies, management plans, management measures, and reporting.	Continuous/ongoing.	Active In Compliance	Active In Compliance	Section 2 of Sabina's <i>2022 Annual Report</i> lists different engagements.
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.	Ongoing.	Active In Compliance		Completed by NIRB.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
1	To have an Air Quality Monitoring and Management Plan in place.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • <i>Air Quality Monitoring and Management Plan</i> (2019) (Public Registry ID No. 329195). • B2Gold will continue its monitoring in 2023 and provide results in the 2023 Annual Report.
2	To demonstrate that air quality emissions remain within predicted levels.	Active In Compliance	Active Deficient In-Progress	<ul style="list-style-type: none"> • <i>Air Quality Monitoring and Management Plan</i> (2019). (Public Registry ID No. 329195). • Sabina retained Golder to initiate air quality monitoring in 2022 for passive NO2 and dustfall. • B2Gold was unable to provide air monitoring results due to collecting and shipping the equipment to site. logistical issues.
3	To have a Dust Management and Monitoring Plan in place.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • <i>Air Quality Monitoring and Management Plan</i> (2019) (Public Registry ID No. 329195). • B2Gold is planning to update the <i>Air Quality and Management</i> with the <i>Fugitive Dust Reduction Plan</i> included in 2023.
4	To have an Incineration Management Plan in place.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • <i>Incineration Management Plan</i> (2020), Public Registry No. 329196.
5	To provide the results of all stack testing conducted on incinerators.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	No testing has been conducted on the temporary incinerators. Stack test will be done upon commissioning of the incinerator and reported as required.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
				<ul style="list-style-type: none"> • <i>Incineration Management Plan</i> (2020), Public Registry ID No. 329196.
6	To maintain a Greenhouse Gas (GHG) Reduction Plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • A GHG Reduction Plan was included in the revised <i>Air Quality Monitoring and Management Plan</i> (2019) (Public Registry ID No. 329195). • In 2022, Sabina retained the service of WSP Consulting to estimate the GHG and it is calculated that there was a total of 13,429 tCO₂e.
7	To maintain a Mine Closure and Reclamation Plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • The latest version of <i>Interim Closure and Reclamation Plan (ICRP; 2021)</i>, Public Registry ID No. 337487
8	To provide a summary of meteorological conditions experienced within the project.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • Meteorological data are presented in Sabina's <i>2022 Annual Report</i>.
9	To demonstrate consideration for noise reduction measures and to demonstrate that noise level remains with reasonable limits.	Active Deficient – in progress	Active Deficient – in progress	<ul style="list-style-type: none"> • <i>Noise Abatement Plan</i> (2015) in the Final Environmental Impact Statement (NIRB Document ID No: 301426). • B2Gold has not started any noise monitoring to confirm Final Environmental Impact Statement predictions. • B2Gold plans to bring a third-party to monitor vibration and noise in July 2023.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
10	To demonstrate consideration for to mitigate noise generated.	Active Deficient – in progress	Active Deficient – in progress	<ul style="list-style-type: none"> • <i>Noise Abatement Plan</i> (2015) in the Final Environmental Impact Statement (NIRB Document ID No: 301426). • B2Gold has not started any noise monitoring to confirm prediction. • B2Gold plans to bring a third-party to monitor vibration and noise in July 2023.
11	To conduct permafrost mapping.	Active Deficient – in progress	Active Deficient – in progress	<ul style="list-style-type: none"> • In 2023, B2Gold is planning to revisit installed past thermistors or Ground Temperature Cables and provide a Thermal Monitoring Plan as part of its 2023 Annual Report.
12	To monitor effects on the permafrost.	Active Deficient in-progress	Active Deficient in-progress	<ul style="list-style-type: none"> • In 2023, B2Gold is planning to revisit past thermistors or Ground Temperature Cables have been installed and to provide a Thermal Monitoring Plan as part of its 2023 Annual Report.
13	To mitigate project impacts on sensitive landforms.	Active Deficient in-progress	Active In Compliance	<ul style="list-style-type: none"> • B2Gold completed a geotechnical inspection in 2022 of sensitive landform. • <i>2022 Annual Geotechnical Inspection Report</i>, Sabina's Appendix B, Public Registry ID No. 343954
14	To provide a Waste Management Plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • <i>Landfill and Waste Management Plan</i> (2017) Public Registry ID No. 337488. • B2Gold submitted an updated version to the Nunavut Water Board and is waiting for approval. Once received the plan will be submitted to the following NIRB's annual report.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
15	To have a Progressive Reclamation Plan in place.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The latest version of <i>Interim and Closure Reclamation Plan</i> (2021), Public Registry ID No.337487. No progressive reclamation activities have been undertaken to date as the Proponent has just started construction.
16	To develop site-specific quarry operation and management plans.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Back River Project Quarry Management Plans</i> (2020), Public Registry ID No.337486.
17	To conduct tests of the tailings and treatment sludges and to evaluate the potential for remobilization of arsenic.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> The latest version of <i>Tailings Management Plan</i> (November 2020), Appendix K to Sabina's <i>2021 Annual Report</i>, Public Registry ID No. 338510. The updated plan is pending approval by the Nunavut Water Board, once approved B2Gold will submit to NIRB's following annual report.
18	To undertake a Geotechnical Characterization Program.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Geotechnical drilling was undertaken in 2018 at proposed water management infrastructure and suggest the area does not have a high permeability. Sabina undertook geotechnical drilling in 2021. To note that B2Gold's currently approved mine plan no longer contains the Tailing Settlement Facility and associated dam.
19	To maintain a Saline Water Management Plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The latest version of <i>Water Management Plan</i> (October 2020), Public Registry ID No. 337485

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
				<ul style="list-style-type: none"> An updated version (2022) of the water management plan which contains a saline water management plan is pending approval by the Nunavut Water Board. At this time, there is no saline water inflows requiring monitoring at the Back River Project.
20	To develop a Thermal Monitoring Plan.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> <i>Thermal Monitoring Plan</i> to be submitted 60 days before construction of infrastructure components at Main Dam, Llama Pit and Umwelt to be monitored. However, B2Gold confirmed that permafrost monitoring has started in Primary Pond and Goose Camp
21	To maintain an Aquatic Effects Monitoring Plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Aquatic Effect Monitoring Plan (AEMP)</i> (October 2017), Public Registry ID No: 337490. Sabina included a summary of the 2022 baseline in Appendix C, <i>Aquatic Baseline Summary Report</i> (Public Registry ID No: 343954)
22	To maintain a Site Water Monitoring and Management Plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The latest version of <i>Water Management Plan</i> (October 2020), Public Registry ID No. 337485. An updated version is currently with the Nunavut Water Board for approval.
23	To maintain an appropriate setback distance between quarries and permanent waterbodies.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Borrow Pits and Quarry Management Plan</i> (2020), Public Registry ID No. 337486 Setback distances have been maintained in 2022.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
24	To prevent blockages or restrictions to fish passages.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Follow-up monitoring was done by the Proponent to ensure there was no obstruction to fish passage at Rascal Stream. The crossing has been replaced by a steel oblong culvert.
25	To mitigate impacts of explosives use on fish habitat.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> No blasting occurred within or near setbacks from fish-bearing waters according to DFO criteria. If blasting B2Gold will use the Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters (1998)
26	To minimize impacts to the migration of Arctic Grayling.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> B2Gold has been working with Parties on planned work on Rascal Stream West. Updates will continue and once the final design and monitoring plans will be submitted to the NIRB at least 30 days before construction of the fish passage.
27	To minimize impacts to freshwater fish habitat that may be used for water withdrawal.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Prior to the construction of the 2022 Winter Ice Road, Sabina submitted its water withdrawal study. <i>Winter Ice Road Technical Memorandum</i> (Sabina, 2022), Public Registry ID No. 342368
28	To minimize impacts to fish from the Winter Ice Road	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> B2Gold equips all water intake hoses with a screen to ensure fish are not entrained. B2Gold implements all applicable Fisheries and Oceans Canada best practices to avoid harm to fish.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
29	To minimize impacts from Water Crossings.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Erosion and sediment control measures installed at Gander Outflow. Follow-up monitoring was done by the Proponent to ensure there was no obstruction to fish passage at Rascal Stream. The crossing has been replaced by a steel oblong culvert. DFO confirms the Proponent has been working with them and issued a letter of advice on the Project.
30	To monitor culverts and to ensure no barriers to fish.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Back River Project Early Works – Request for Review Application Follow-up monitoring was done by the Proponent to ensure there was no obstruction to fish passage at Rascal Stream. The crossing has been replaced by a steel oblong culvert. The engineering design for the new culvert was submitted to the NWB and DFO.
31	To provide monitoring updates on the Rascal Stream Fish Passage.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> B2Gold will conduct monitoring of the construction in fish-bearing waters in 2023, results to be presented in the 2023 Annual Report.
32	To minimize the Site Footprint.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The Project footprint for the Goose Property and the Marine Laydown Area (MLA) totals 125.7 hectares. Table 4.5.9-1 in the <i>2022 Annual Report</i> in details Sabina's Project footprint.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
33	To prevent the introduction of Invasive Species.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Equipment destined for the Back River Project are free of soil and plant debris. No invasive plant was identified by Sabina in 2022. <i>Pre-Shipment Equipment Cleaning</i> verification forms (2022), Appendix F in the Sabina's 2022 Annual Report, Public Registry ID No. 343955.
34	To have a Vegetation Monitoring Plan in place to monitor impacts on vegetation along the Winter Ice Road.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Ten (10) new vegetation monitoring plots were established in 2022. <i>Vegetation Monitoring Plan</i> (2020), NIRB ID: 328160 <i>Vegetation Monitoring Program</i> (Golder, 2022) Appendix E in Sabina's Annual Report, Public Registry ID No. 343955.
35	To develop a progressive Revegetation and Reclamation program.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Incorporated in <i>Interim Closure and Reclamation Plan</i> (ICRP) (Sabina, 2021), Public Registry ID No. 337487. Within the (3) years of the start of construction, information regarding the revegetation strategies will be developed and implemented by B2Gold and information provided annually to the NIRB.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
36	To include a revegetation strategy within its Mine Closure and Reclamation Plan (ICRP).	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Incorporated in <i>ICRP</i> (2021), Public Registry ID No. 337487. The updated version is currently under review by the NWB and is expected to be provided to the NIRB and posted on the Proponent's website.
37	To have in place a Wildlife Mitigation and Monitoring Plan (WMMPP).	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2022), Public Registry ID No. 345708. B2Gold updated its WMMPP to include the aspects of the on-going reconsideration of the Energy Centre.
38	To monitor wildlife with relevant parties.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2022), Public Registry ID No. 345708 In December 2022, Sabina met with KIA and the GN as part of the Caribou Technical Advisory Group to discuss 2020, 2021, 2022 monitoring results and plans for 2023.
39	To mitigate potential impacts to caribou.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2022), Public Registry ID No. 345708. In 2022, there were no situations requiring a response above Level 2.
40	To ensure the utilization of satellite collar data are rapidly communicated for monitoring and adaptive management.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> During 2022, Sabina used the collar data listed in the WMMPP to monitor the need for caribou mitigation. <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2022), Public Registry ID No. 345708.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
41	To mitigate impacts on caribou during the July 26 to August 31 period.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures are described in <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No. 345708. Sabina indicated how they conducted work during this time in the <i>2022 Annual Report</i>
42	To ensure mitigation measures are apply to all caribou.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures are described in <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No. 345708. Sabina stated that they followed the mitigation measures in their <i>2022 Annual Report</i>
43	To develop procedures should wildlife be deemed project tolerant.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> In 2018 and 2019, Procedures to deter wildlife if deemed project tolerant were discussed on multiple with the KIA and the GN. Measures are described in <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No: 345708. In 2022, no Project tolerant caribou were observed around the MLA or Goose Camp.
44	To develop mitigation measures for muskox.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures are described in <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No: 345708. In 2022, no muskox were observed during activities that require mitigation.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
45	To mitigation potential disturbances to wildlife movement.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures are described in <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No. 345708. The WIR was not constructed in 2022
46	To report all direct mortalities.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures are described in <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No: 345708. No wildlife mortalities were reported in 2022, <i>2022 Pre-Construction Wildlife Mitigation and Monitoring Plan</i>, Sabina's appendix G, Public Registry ID No. 343956.
47	To mitigate wildlife interaction with the attenuation ponds and/or tailings storage areas.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> No water attenuation ponds, or tailings storage areas were constructed at the Project site. Mitigation measures and monitoring are described in <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No: 345708.
48	To mitigate wildlife attraction to the project.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures and monitoring are described in <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No. 345708. During 2022, there were nine (13) observations of grizzly and three (21) observations of wolverine. One (1) wolverine was reported within the camp perimeter and was deterred by human presence, bear bangers and rubber bullets. An incident occurred where a small carnivore bit the leg of a worker, resulting from this incident Mitigation actions

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
				taken include installation of wire mesh over vent louvres on the building intake duct, and a safety presentation to all staff regarding wildlife interactions, precautions, and waste management.
49	To report annually on the terrestrial wildlife monitoring to the Nunavut Impact Review Board.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The <i>2022 Pre-Construction Wildlife Mitigation and Monitoring Program Report</i>, Sabina's appendix G, Public Registry ID No: 343956.
50	To provide an annual report on ongoing monitoring and mitigation efforts.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The <i>2022 Pre-Construction Wildlife Mitigation and Monitoring Program Report</i>, Sabina's appendix G, Public Registry ID No. 343956. In 2022, a level 2 site notification was triggered due to caribou collared data within 100 km.
51	To establish a Caribou Technical Advisory Group (CTAG) which oversight caribou management.	Active Deficient – In Progress	Active Deficient – In Progress	<ul style="list-style-type: none"> The <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No. 345708. In 2022, the CTAG met in December to discuss updates to the Projects plans, results of the monitoring and plans for monitoring in 2023. The NIRB notes that the information is very limited to understand what is being discussed within the CTAG and how information is included or not included in monitoring plans.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
52	To ensure caribou protection from mineral exploration.	Active Deficient – In Progress	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> In the <i>2022 Annual Report</i> Sabina stated that there is currently no planned or occurring mineral exploration outside its mineral tenures or Project Development Area.
53	To have in place and apply mitigation measures and monitoring for birds.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures and monitoring are described in the <i>Wildlife Mitigation and Monitoring Program Plan V.12 (2023)</i>, Public Registry ID No. 345708.
54	To mitigate impacts to Species at Risk.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures described in the <i>Wildlife Mitigation and Monitoring Program Plan V.12 (2023)</i>, Public Registry ID No. 345708. In 2022, ground-clearing occurred, and no nest were observed, results are presented in the <i>2022 Pre-Construction Wildlife Effects Monitoring Program Report</i>, Sabina's Appendix G, Public Registry ID No. 343956.
55	To ensure that mitigation and monitoring strategies developed for Species at Risk are updated.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The Proponent keeps updating its plan and updated the table of species at risk occurring in the Project area. The <i>Wildlife Mitigation and Monitoring Program Plan V.12 (2023)</i>, Public Registry ID No. 345708. The <i>2022 Pre-Construction Wildlife Effects Monitoring Program Report</i>, Sabina's Appendix G, Public Registry ID No: 343956.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
56	To mitigate impacts to birds from construction and clearing activities.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> In 2022, ground-clearing occurred, and no nest were observed, results are presented in the <i>2022 Pre-Construction Wildlife Effects Monitoring Program Report</i>, Sabina's Appendix G, Public Registry ID No: 343956.
57	To mitigate impacts to raptors from project construction.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> No deterrence or removal or raptor nests was required in 2022. Mitigation measures described in the <i>Wildlife Mitigation and Monitoring Program Plan V.12 (2023)</i>, Public Registry ID No. 345708.
58	To include mitigation measures within the Wildlife Mitigation and Monitoring Plan for seabirds and waterfowl.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures described in the <i>Wildlife Mitigation and Monitoring Program Plan V.12 (2023)</i>, Public Registry ID No. 345708. Setbacks distance described in the <i>Back River Project Standard Operating Procedure: Marine Shipping Wildlife Mitigation and Monitoring (2019)</i>, Public Registry ID No. 327175.
59	To report bird mortality.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> No bird mortalities were reported due to Project Activities in 2022.
60	To ensure that project aircraft maintain sufficient cruising altitudes to wildlife.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Mitigation measures described in the <i>Wildlife Mitigation and Monitoring Program Plan V.12 (2023)</i>, Public Registry ID No: 345708.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
				<ul style="list-style-type: none"> The <i>2022 Pre-Construction Wildlife Effects Monitoring Program Report</i>, Sabina's Appendix G, Public Registry ID No. 343956.
61	To ensure aircraft are following minimum flying altitude.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Some results are presented in the <i>2022 Pre-Construction Wildlife Effects Monitoring Program Report</i>, Sabina's Appendix G, Public Registry ID No. 343956.
62	To maintain a marine monitoring program.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Marine Monitoring Plan</i> (2018), Public Registry ID No. 319642. Results and sampling locations are presented in the <i>Marine Monitoring Report</i>, Sabina's Appendix J of its <i>2022 Annual Report</i>, Public Registry ID No. 343957

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
63	To undertake a survey of seals prior to the construction of the Winter Ice Road (WIR).	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> No survey occurred in 2022 as the WIR or the winter airstrip were not constructed. Monitoring described in the <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No. 345708.
64	To ensure shipping companies contracted have a marine mammal monitoring protocol.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Protocol is given to shipping companies prior to shipping season, <i>Back River Project Standard Operating Procedure: Marine Shipping Wildlife Mitigation and Monitoring</i> (2019), Public Registry ID No. 327175 Monitoring described in the <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No: 345708.
65	To ensure contracted shipping companies are aware of sensitive wildlife habitat and use appropriate protocols in case of a fuel accident.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Response to oil spill is described in <i>The Oil Pollution Management Plan</i>, Public Registry ID No: 319643 All ships transporting fuel are required to have an approved <i>Shipboard Oil Pollution Emergency Plan</i>. It is also a requirement by the International Maritime Organization. Sensitive marine habitats are illustrated in the <i>Back River Project Standard Operating Procedure: Marine Shipping Wildlife Mitigation and Monitoring</i> (2019), Public Registry ID No: 327175 Mitigation measures are described in the <i>Wildlife Mitigation and Monitoring Program Plan V.12</i> (2023), Public Registry ID No: 345708.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
66	The Proponent is encouraged to participate in the work of the Kitikmeot Socio-Economic Monitoring Committee.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Sabina is involved in the Kitikmeot Socio-Economic Monitoring Committee, although no meeting was organized in 2022 by the Government of Nunavut. A monitoring framework is described in the <i>Socio-Economic Monitoring Plan</i> (2022). It is the appendix L of the <i>2022 Annual Report</i> (Public Registry No. 338510).
67	To develop Terms of Reference for the Socio-Economic Monitoring Working Group (SEMWG)	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> The Terms of Reference have been submitted to NIRB in 2018 and are included as Appendix A of the <i>Socio-Economic Monitoring Plan</i> (2022). It is the appendix L of the <i>2022 Annual Report</i> Public Registry ID No: 338510.
68	To develop a Project-specific Back River Socio-Economic Monitoring Program.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Socio-Economic Monitoring Plan</i> (2022). It is the appendix L of the <i>2022 Annual Report</i> (Public Registry ID No. 338510). Monitoring results are presented in the <i>2022 Socio-Economic Monitoring Report</i>, Appendix H of Sabina's <i>2022 Annual Report</i> (Public Registry ID No. 343957).
69	To analyze potential risks of temporary mine closure.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects</i> (2018), Public Registry ID No: 320331
70	To ensure Socio-Economic Management Plan and Socio-Economic Management Program address the risk and potential	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Temporary Mine Closure in the Kitikmeot Region: Risks and Potential Socio-Economic Effects</i> (2018), Public Registry ID No: 320331. <i>Socio-Economic Monitoring Plan</i> (2022). It is the appendix L of the <i>2022 Annual Report</i> Public Registry ID No: 338510.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
	effects of temporary mine closure.			<ul style="list-style-type: none"> • <i>Community Involvement Plan</i> (2022), Appendix C of Sabina's 2021 Annual Report, Public Registry ID No: 338509 • <i>Human Resources Plan</i> (2022) Appendix I of Sabina's 2021 Annual Report, Public Registry ID No: 338510 • <i>Business Development Plan</i> (2022) Appendix E of Sabina's 2021 Annual Report, Public Registry ID No: 338509
71	To submit Staff Schedule information.	Active Non-compliance	Active In Compliance	<ul style="list-style-type: none"> • A staff schedule was submitted as Appendix D of the 2022 <i>Socio-Economic Monitoring Report</i>, Appendix H of Sabina's 2022 Annual Report, Public Registry ID No: 343957 <p>The NIRB looks forward to an update six months prior to the start of operations.</p>
72	To provide the GN with register of Trades Workers	Active Deficient – in progress	Active In Compliance	<ul style="list-style-type: none"> • A list of registered workers in submitted as Appendix E of the 2022 <i>Socio-Economic Monitoring Report</i>, Appendix H of Sabina's 2022 Annual Report, Public Registry ID No: 343957
73	The Proponent is encouraged to work with training organization to ensure training opportunities.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • Sabina participated in multiple training-related discussions through various forum in 2022. • Information on training is available within Appendix E of the 2022 <i>Socio-Economic Monitoring Report</i>, Appendix H of Sabina's 2022 Annual Report, Public Registry ID No: 343957
74	To maintain a referenced listing of formal certificates	Active	Active	<ul style="list-style-type: none"> • Information is available within Appendix F of the 2022 <i>Socio-Economic Monitoring Report</i>, Appendix H of

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
	and licences that may be acquired on-site.	In Compliance	In Compliance	Sabina's <i>2022 Annual Report</i> , Public Registry ID No: 343957
75	To ensure educational opportunities for Project employment.	Active Deficient – in progress	Active In Compliance	<ul style="list-style-type: none"> Data are available within Appendix C of the <i>2022 Socio-Economic Monitoring Report</i>, Appendix H of Sabina's <i>2022 Annual Report</i>, Public Registry ID No: 343957 The results were discussed with the Socio-Economic Monitoring Working Group in June 2022 by videoconference.
76	The Proponent is encouraged to provide second language training.	Active Deficient – in progress	Active In Compliance	<ul style="list-style-type: none"> Sabina will provide support to employees interested in learning a second language. To date no demand have been requested. Detail on the training program and request process is available within the <i>Human Resources Plan (2022)</i>, Appendix I of Sabina's <i>2021 Annual Report</i>, Public Registry ID No: 338510.
77	To monitor demographic changes affecting the Kitikmeot communities.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Information on population demographic available in the <i>2022 Socio-Economic Monitoring Report</i>, Appendix H of Sabina's <i>2022 Annual Report</i>, Public Registry ID No: 343957
78	To ensure to incorporate Inuit Qaujimajatuqangit and Traditional Knowledge into monitoring plans.	Active <i>Deficient-in Progress</i>	Active In Compliance	<ul style="list-style-type: none"> Sabina presents feedback from community members and how they responded to it within its <i>2022 Socio-Economic Monitoring Report</i>, Appendix H of Sabina's <i>2022 Annual Report</i>, Public Registry ID No: 343957

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
79	To establish an Inuit Environmental Advisory Committee (IEAC)	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> Reported that Sabina and KIA it will establish an IEAC within 120 days of commencement of production.
80	To assess potential impacts from winter ice road on caribou harvesting.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Winter Ice Road was not constructed in 2022, so no public use was recorded.
81	Non-Traditional Activity and Resource Use	Active Deficient in-progress	Active In Compliance	<ul style="list-style-type: none"> Sabina issued letter to outfitting companies in the region and one response was received from the Bathurst Inlet Lodge. Letter is presented as Appendix G of the <i>2022 Socio-Economic Monitoring Report</i>, Appendix H of Sabina's <i>2022 Annual Report</i>, Public Registry ID No: 343957 The <i>Outfitting/Guiding Business Consultation Protocol</i> is included as the Appendix D within the <i>Socio-Economic Monitoring Plan (2022)</i>, Public Registry ID No: 338510.
82	To assess archaeological and heritage resources.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Sabina submitted its Archaeology Site Status Report in 2020 and there were no changes to project footprint. In 2021, the archaeological program was conducted under the Nunavut Archaeologist Permit 2021-27A. No additional sites were observed or revisited during the 2021. No additional archaeology was recommended for any of the Project footprints.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
83	To assess employee housing enhancement/ access to housing option.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Sabina will offer financial management orientation to employees; however, no training programs have been offered by Sabina to date. The Employee and Family Assistance Program is described within the <i>Human Resources Plan (2022)</i>, Appendix I of Sabina's <i>2021 Annual Report</i>, Public Registry ID No: 338510.
84	To assess and monitor project-induced effects on regional housing.	Active Deficient – in progress	Active In Compliance	<ul style="list-style-type: none"> Data was collected from the 2022 Inuit Personnel Survey. This topic was discussed with the SEMWG in June 2022. Results are presented the <i>2022 Socio-Economic Monitoring Report</i>, Appendix H of Sabina's <i>2022 Annual Report</i>, Public Registry ID No: 343957 The survey is presented in the <i>Human Resources Plan (2022)</i>, Appendix I of Sabina's <i>2021 Annual Report</i>, NIRD ID No: 338510.
85	To establish a cross-cultural awareness training.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> In 2022, 21 cross-cultural training sessions were delivered. Results are presented the <i>2022 Socio-Economic Monitoring Report</i>, Appendix H of Sabina's <i>2022 Annual Report</i>, Public Registry ID No: 343957 The cross-cultural orientation is described in the <i>Human Resources Plan (2022)</i>, Appendix I of Sabina's <i>2021 Annual Report</i>, NIRD ID No: 338510.
86	To monitor potential health risk from airborne actinolite fibers.	Active Non-Compliant	Active In Compliance	<ul style="list-style-type: none"> No airborne actinolite fibres have been identified.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
87	To have in place a site orientation plan.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> A Site Orientation Program is in place for all site personnel. The orientation is updated on an as-needed basis.
88	To include consideration for worker safety in its winter ice road operations.	Active Deficient – in progress	Active In Compliance	<ul style="list-style-type: none"> Consideration on safety is included within the <i>Road Management Plan</i> (2021), Appendix E to Sabina's 2020 Annual Report, Public Registry ID No: 334442.
89	To include prevention measures for fuel spills into the marine environment and mitigating potential effects of an accidental spill.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> Spill management with key contact information of communities are included within the <i>Wildlife Mitigation and Monitoring Program Plan</i> V.12 (2023), Public Registry ID No: 345708. <i>Oil Pollution Emergency Plan</i> (2023), Appendix I to Sabina's 2022 Annual Report, Public Registry ID No: 343957. <i>Spill Contingency Plan</i> (2015), Public Registry ID No: 280283
90	To maintain an Oil Pollution Emergency Plan (OPEP).	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Oil Pollution Emergency Plan</i> (2023), Appendix I to Sabina's 2022 Annual Report, Public Registry ID No: 343957.
91	To contract certified vessels for shipping and ensure awareness of the requirements.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> <i>Shipping Management Plan</i> (2018), Public Registry ID No: 319686. <i>Oil Pollution Emergency Plan</i> (2023), Appendix I to Sabina's 2022 Annual Report, Public Registry ID No: 343957.

T&C*	Subject	Status 2022	Status 2023	Notes/Reference
				<ul style="list-style-type: none"> • <i>Risk Management and Emergency Response Plan</i> (2018), Public Registry ID No: 319645. • All plans are provided to the shippers to ensure awareness.
92	To ensure availability of spill response equipment.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • The plan lists spill response equipment and training to conduct, <i>Oil Pollution Emergency Plan</i> (2023), Appendix I to Sabina's <i>2022 Annual Report</i>, Public Registry ID No: 343957.
93	To submit a post-construction depiction of the MLA.	Not Yet Active Not Yet Applicable	Not Yet Active Not Yet Applicable	<ul style="list-style-type: none"> • No in-water construction occurred in the marine environment in 2022.
94	To ensure fuel transportation meets industry design.	Active In Compliance	Active In Compliance	<ul style="list-style-type: none"> • Sabina ensures that all fuel trucks meet industry standards and included a summary table of maintenance and inspections.

* For the specific wording of a term and condition, please refer to the Back River Project Certificate No. 007 (issued December 2017), Public Registry ID No: 314593