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**B2GOLD CORP.**

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## MEMO

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**From** Merle Keefe, B2Gold Nunavut

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**To** Kelli Gillard, Manager, Project Monitoring, Nunavut Impact Review Board

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**Ref.** 0704187

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**Date** 15 February 2024

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**Subject** Response to the Nunavut Impact Review Board's *2022-2023 Annual Monitoring Report for the Back River Project* and the Board's Recommendations

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Dear Kelli,

B2Gold Nunavut (B2Gold) purchased the Back River Project from Sabina Gold and Silver in Spring 2023. B2Gold has reviewed the Nunavut Impact Review Board's (NIRB) recommendations on the 2022-2023 Annual Monitoring Report for the Back River Project. This memo addresses these recommendations.

Under NIRB Project Certificate No. 007, Term and Condition No. 51 B2Gold is required to establish an advisory group to provide technical oversight related to caribou – the Caribou Technical Advisory Group (CTAG) made up of representatives from the Kitikmeot Inuit Association (KitIA) and the Government of Nunavut (GN). During these meetings, B2Gold presents project updates to the CTAG followed by discussion on any key issues or concerns. The CTAG was initiated in 2019 and meets annually or several times per year. Term and Condition 51 includes reporting requirement of: Information regarding the Proponent's fulfillment of this Term and Condition shall be included in the Proponent's annual report to the Nunavut Impact Review Board.

In December 2022 and January 2023, Sabina engaged with Kitikmeot Inuit Association, and the Government of Nunavut, in a CTAG to provide technical oversight of the Project's caribou monitoring. During the meetings Sabina provided project updates to the CTAG, held open discussions regarding key issues. Table 1 summarizes the meeting presentation topics, key issues discussed, and B2Gold commitments.

Table 1: Summary of Key Issues and Responses from 2022/2023 CTAG meetings

CTAG Meeting Date	Topics of Discussion	Key Issues Identified	B2Gold Commitments
14 December 2022	<ul style="list-style-type: none"> <li>◆ Project updates, including:               <ul style="list-style-type: none"> <li>◇ 2022 Construction and engineering completed</li> <li>◇ Planned activities for 2023</li> <li>◇ 2023 Planned Exploration Activities</li> <li>◇ Update on project footprint within PDA</li> <li>◇ Update on Caribou monitoring and observations of caribou, seal lairs, marine mammals, and sea birds</li> </ul> </li> <li>◆ Winter Ice Road (WIR) wildlife protection measures, including:               <ul style="list-style-type: none"> <li>◇ Overview of the WIR</li> <li>◇ Mitigations for WIR</li> <li>◇ Evaluation of Bear Habitat</li> <li>◇ Mitigation for Wildlife</li> <li>◇ Caribou and the WIR, including analysis of 2019 results</li> <li>◇ Discussion of 2023 monitoring program</li> </ul> </li> <li>◆ Energy Centre Application, including:               <ul style="list-style-type: none"> <li>◇ Overview of Energy Centre Project</li> <li>◇ Field surveys and results</li> <li>◇ Mitigation and Management for birds and caribou</li> </ul> </li> </ul>	<ol style="list-style-type: none"> <li>1. Caribou Monitoring during WIR activities.</li> </ol>	<ol style="list-style-type: none"> <li>1. To support caribou monitoring B2Gold will:               <ol style="list-style-type: none"> <li>a. Have a dedicated Inuit transiting the road monitoring for caribou, whom will be supported by a wildlife biologist performing behavior monitoring of caribou in proximity to the Project.</li> <li>b. Establish remotely activated caribou monitoring cameras along the road route.</li> <li>c. Complete drone monitoring.</li> <li>d. Ensure all other wildlife mitigation measures are in place, such as limiting bank heights, monitoring caribou collar data for the herd’s approach, and ensuring all operators are briefed on the Project wildlife requirements.</li> </ol> </li> </ol>
12 January 2023	<ul style="list-style-type: none"> <li>◆ Winter Ice Road: Wildlife Protection Measures, including:               <ul style="list-style-type: none"> <li>◇ Bear Habitat</li> <li>◇ Caribou Collars and migration</li> <li>◇ Mitigations for Wildlife</li> </ul> </li> <li>◆ Caribou Behaviour Monitoring               <ul style="list-style-type: none"> <li>◇ Standard Operating Procedures</li> <li>◇ Objectives</li> <li>◇ Reconnaissance</li> </ul> </li> </ul>	<ol style="list-style-type: none"> <li>1. Discussion of whether collar data are representative of herd locations.</li> <li>2. When will WIR monitoring start?</li> <li>3. Can the Standard Operating Procedures for Caribou behavior monitoring presented be included in the Annual Report?</li> <li>4. To reduce interactions with caribou, is it possible to transport freight and fuel early on the WIR?</li> <li>5. What options are available for nighttime monitoring?</li> </ol>	<ol style="list-style-type: none"> <li>1. Experience has been that collars are predictive of the arrival of the front end of caribou herd. B2Gold plans to include a figure in the WMMP Report comparing collar vs. incidental reports of Caribou.</li> <li>2. B2Gold plans to start WIR monitoring in late March.</li> <li>3. B2Gold will share the behaviour SOP in the next Annual Report.</li> </ol>

CTAG Meeting Date	Topics of Discussion	Key Issues Identified	B2Gold Commitments
	<ul style="list-style-type: none"> <li>◇ Selecting groups to survey</li> <li>◇ Conducting Survey</li> <li>◇ Behaviour Examples</li> </ul>		<ul style="list-style-type: none"> <li>4. B2Gold will plan to move as much fuel and freight early on the WIR to reduce the overlap with Caribou migration.</li> <li>5. B2Gold plans to investigate options for night monitoring of Caribou on the WIR.</li> </ul>
27 November 2023	<ul style="list-style-type: none"> <li>◆ Sabina Gold &amp; Silver Acquisition by B2Gold Nunavut, including:               <ul style="list-style-type: none"> <li>◇ Background on B2Gold</li> <li>◇ Back River Project overview</li> </ul> </li> <li>◆ Energy Centre Project, including:               <ul style="list-style-type: none"> <li>◇ Mitigations</li> <li>◇ Community Engagement</li> <li>◇ Windfarm visual renderings</li> </ul> </li> <li>◆ Energy Centre WMMP Updates, including:               <ul style="list-style-type: none"> <li>◇ Caribou herd interactions</li> <li>◇ Inuit Qajimajatuqangit and Traditional Knowledge</li> <li>◇ Mitigation for caribou</li> <li>◇ Updates based on commitments</li> <li>◇ Bird baselines</li> <li>◇ Mitigations and monitoring for birds to be added to WMMP</li> <li>◇ Updates based on commitments</li> </ul> </li> <li>◆ Fuel Modification Package               <ul style="list-style-type: none"> <li>◇ Overview and key features</li> <li>◇ Fuel Management</li> <li>◇ Key mitigations</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>1. Inclusion of all mitigation and monitoring specific to the Back River Project Energy Centre in the WMMP.</li> </ul>	<ul style="list-style-type: none"> <li>1. All mitigation and monitoring specific to the Back River Project Energy Centre will be included in an appendix of the WMMP.</li> </ul>

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Sincerely,

A handwritten signature in black ink, appearing to read 'Merle Keefe', is positioned above a horizontal yellow line.

**Merle Keefe**

Manager, Environment, B2Gold Back River Corp.

Cc: Jaymes Dircks, General Manager, B2Gold Back River Corp.  
Andrew Moore, Director, Indigenous and Northern Affairs, B2Gold Back River Corp.  
Kristina Benoit, Manager, Environmental Permitting, B2Gold Back River Corp.