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**Sent:** June 23, 2025 8:33 AM

**To:** nirb info <info@nirb.ca>

**Subject:** [EXTERNAL] Transport Canada's comments for 2024 Annual Report - B2Gold Back River Project

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Good Day,

In response to the Nunavut Impact Review Board's May 23, 2025, request, Transport Canada has reviewed B2Gold's Back River Project 2024 Annual Monitoring Report. Please note that Transport Canada's review was limited to those areas of the monitoring report that are relevant to the Department's mandate and jurisdiction/areas of expertise.

Transport Canada's comments on the Back River Project 2024 Annual Monitoring Report cover three topic areas:

1. Marine safety and security
2. Navigation Protection
3. Transportation of Dangerous Goods (TDG)

#### 1. **Marine Safety**

Comment Number:	TC-01
Subject/Topic:	Inspections - Marine Transportation; Oil Handling Facility
References:	2024 Annual Report - none
Comment: <ul style="list-style-type: none"> <li>• Gap/Issue</li> <li>• Disagreement with the Annual Report conclusion</li> <li>• Reasons for disagreement with the Annual Report conclusion</li> <li>• Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix</li> </ul>	<ul style="list-style-type: none"> <li>• The Project's oil handling facility (OHF) in compliance with regulatory requirements as per part 8 of the <i>Canada Shipping Act</i>, 2001. Transport Canada did not carry out an inspection of the OHF in 2024.</li> <li>• The Back River facility meets the requirements of the Marine Transportation Security Regulations and remains in compliance. The certificate for Occasional-use Marine Facility is current and valid. No inspection was completed in 2024.</li> <li>• No enforcement activity was undertaken or required last year by Transport Canada for the OHF or marine facility.</li> </ul>
Conclusion/Request	None.

Comment Number:	TC-02
Subject/Topic:	Project's Oil Pollution Emergency Plan (OPEP) and Oil Pollution Prevention Plan (OPPP)
References:	2024 Annual Report; 4.7.1 Accidents and Malfunctions (Annual Report, pp. 4-198 – 4-203)
Comment: <ol style="list-style-type: none"> <li>1. Gap/Issue</li> </ol>	To demonstrate compliance with Terms and Conditions #'s 89-92, the Proponent references the Oil Pollution Prevention Plan & Oil Pollution Emergency Plan (2024).

2. Disagreement with the Annual Report conclusion	<p>The operator submitted a Post Oil Transfer Report in September 2024 to Transport Canada providing details on the 2024 transfer season. Transport Canada's Marine Safety and Security Environmental Response Program reviewed the Post Oil Transfer Report and did not raise any concerns with the operator.</p> <p>For the information of reviewers, it should be noted that operators are required to review their OPEPs and OPPPs annually, but are not required to submit their plans to Transport Canada annually. However, a change in operations does trigger a requirement to submit updated plans 90 days before the change.</p> <p>Further, as required under the <i>Canada Shipping Act, 2001</i>, the facility will need to notify Transport Canada of proposed changes to the OHF's operations relating to the loading or unloading of oil to or from vessels 180 days in advance of the change.</p>
3. Reasons for disagreement with the Annual Report conclusion	
4. Disagreement and reasons for disagreement with conclusions within the Additional Documents in Appendix	
Conclusion/Request	None.

Comment Number:	TC-03
Subject/Topic:	Marine shipping standard operating procedure
References:	<p>2024 Annual Report; Appendix K 2024 Wildlife Mitigation and Monitoring Program Report</p> <p>○ Section 8.2 - Marine Shipping Mitigation and Monitoring</p> <p>2025 Shipping Management Plan</p>
Comment: 1. Gap/Issue	<p>Transport Canada recommends the Proponent make vessel operators serving the Project aware of the 2025 Annual Notice to Mariners, and in particular section A2 Marine Mammal Guidelines and Marine Protected Areas and section 7A Voyage Planning for Vessels Intending to Navigate in Canada's</p>

2. Disagreement with the Annual Report conclusion	Northern Waters and section 7C Vessels Intending to Navigate in Kitikmeot Region in Canada's Northern Waters (see: Annual Notice to Mariners at: <a href="https://publications.gc.ca/collections/collection_2025/mpo-dfo/Fs151-4-2025-eng.pdf">https://publications.gc.ca/collections/collection_2025/mpo-dfo/Fs151-4-2025-eng.pdf</a> ).
3. Reasons for disagreement with the Annual Report conclusion	
4. Disagreement and reasons for disagreement with conclusions within the Additional Documents in Appendix	
Conclusion/Request	Transport Canada requests that the above information be brought to B2Gold's attention.

Comment Number:	TC-04
Subject/Topic:	Shipping Management - Biofouling
References:	2024 Annual Report – none 2025 Shipping Management Plan – none
Comment: <ul style="list-style-type: none"> <li>Gap/Issue</li> <li>Disagreement with the Annual Report conclusion</li> </ul>	<p>The following is for the information of B2Gold, NIRB, and reviewers of the 2024 Annual Report on the subject of biofouling:</p> <ul style="list-style-type: none"> <li>In Fall 2022, Transport Canada published its <a href="#">Voluntary Guidance for Relevant Authorities on In-Water Cleaning of Vessels (canada.ca)</a>, which includes a biofouling management plan and biofouling record book templates that have been well regarded internationally. The guidance provides clarity to stakeholders (competent authorities, vessel owners and operators, and in-water clean-up service providers) on recommended best</li> </ul>

<ul style="list-style-type: none"> <li>• Reasons for disagreement with the Annual Report conclusion</li> <li>• Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix</li> </ul>	<p>practices that can be used to manage the biosecurity and water quality risks associated with cleaning vessels underwater.</p> <ul style="list-style-type: none"> <li>• The International Maritime Organization's (IMO) Marine Environment Protection Committee (MEPC) adopted the revised "Guidelines for the Control and Management of Ship's Biofouling to Minimize the Transfer of Invasive Aquatic Species" (<a href="https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MEPCDocuments/MEPC.378%2880%29.pdf">https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MEPCDocuments/MEPC.378%2880%29.pdf</a>). These guidelines provide recommendations on in-water inspections with a focus on the quantitative assessment of biofouling using a biofouling rating number, as well as on observations of the anti-fouling system condition, which will assist vessel owners and operators in minimizing the transfer of potentially harmful aquatic species, following globally agreed guidance.</li> </ul>
<p>Conclusion/Request</p>	<p>Transport Canada requests that the above information be brought to B2Gold's attention.</p>

Comment Number:	TC-05
Subject/Topic:	Permits – Navigation Protection Program
References:	2024 Annual Report, Table 1.2-1: Permit Registry
Comment: <ul style="list-style-type: none"> <li>• Gap/Issue</li> <li>• Disagreement with the Annual Report conclusion</li> <li>• Reasons for disagreement with the Annual Report conclusion</li> <li>• Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix</li> </ul>	<p>As noted on in Table 1.2.1, Transport Canada’s Navigation Protection Program (NPP) has issued three approvals for works associated with the Project’s marine laydown area (MLA):</p> <ul style="list-style-type: none"> <li>• 2012-600767-002 – MLA Discharge Pipeline Authorization</li> <li>• 2012-600767-003 – MLA Intake Pipeline Authorization</li> <li>• 2012-600767-006 – MLA Lightering Barge Authorization</li> </ul> <p>NPP has advised they cannot comment on the standing of these three approvals as B2Gold has not filed a Transfer of Ownership with NPP. Until such time as this Transfer has been received and accepted by NPP, authority over the three authorizations listed above remains with Sabina Gold and Silver Corporation.</p>
Conclusion/Request	None.

## 2. Navigation Protection

## 3. Transportation of Dangerous Goods (TDG)

Comment Number:	TC-05
Subject/Topic:	Transportation of Dangerous Goods / Hazardous Materials
References:	2024 Annual Report
Comment: <ul style="list-style-type: none"> <li>• Gap/Issue</li> <li>• Disagreement with the Annual Report conclusion</li> <li>• Reasons for disagreement with the Annual Report conclusion</li> <li>• Disagreement and reasons for disagreement with conclusions within the Additional Documents in the Appendix</li> </ul>	<p>No Transportation of Dangerous Goods (TDG) monitoring was carried out at the Back River Project by Transport Canada TDG Group in 2024. No complaints/concerns regarding TDG were received by Transport Canada and the Department did not undertake any enforcement actions.</p> <p>Other than the matter documented in Comment Number TC-06 regarding documentation of the disposal of hazardous material off-site, Transport Canada's TDG Group had no concerns with the 2024 Annual Report.</p>
Conclusion/Request	None

Comment Number:	TC-06
Subject/Topic:	Manifests for shipping of hazardous materials
References:	<p>2024 Annual Report; Table 4.4-1 – Unauthorized Discharges</p> <ul style="list-style-type: none"> <li>- NIRB # 354422</li> </ul> <p>October 2014 Hazardous Materials Management Plan (HMMP) ; section 3.3 - Wastes</p> <ul style="list-style-type: none"> <li>- NIRB # 280285</li> </ul>
<p>Comment:</p> <p>1. Gap/Issue</p> <p>2. Disagreement with the Annual Report conclusion</p> <p>3. Reasons for disagreement with the Annual Report conclusion</p> <p>4. Disagreement and reasons for disagreement with conclusions within the Additional Documents in Appendix</p>	<p>Table 4.4-1 lists six spills where the spilled material was prepped for disposal off-site. However, manifests documenting the shipping of hazardous material were not included with the 2024 Annual Report.</p> <p>Transport Canada's TDG Group followed up with KBL Environmental in Yellowknife. KBL Environmental will be providing the documentation regarding the transport of dangerous goods wastes to Transport Canada.</p>
Conclusion/Request	<p>Future annual reports for the Back River Gold Mine Project provide information and copies of documents, such as manifests, regarding the transportation of dangerous goods and hazardous materials for the Project, including <i>nil</i> comments. Part of this information would be the inclusion of all hazardous waste manifests for the Project, if any. This information would support reviews of future annual reports.</p>

Please follow-up with me if you have any questions about Transport Canada's review of the 2024 Annual Report for the Back River Project.



Regards,

**Scott Kidd**

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